

The State of South Carolina

In the Court of Appeals

\_\_\_\_\_  
Appeal from Richland County

Robert Hood, Circuit Court Judge

Case number 2015CP40-4319  
\_\_\_\_\_

**RECEIVED**

OCT 02 2018

**SC Court of Appeals**

JK Trading Inc.,  
Appellant

Vs.

Karl & Sasha, Inc.,

Respondent

**Reply Brief**

Trace Dillon

Attorney for Appellant JK Trading, Inc.

P.O. Box 1207

Buford Ga 30515

770-513-6400

[trace@dillonlawfirmpe.com](mailto:trace@dillonlawfirmpe.com)

**Table of Contents**

Argument.....Page 3  
Certificate of Service.....Page 4


## Argument

This case concerns the dispute over the balance due on an account for hair products delivered to Respondent Karl & Sasha, Inc. The unequivocal evidence at trial is that Karl & Sasha owed a balance to JK Trading, Inc. T. at 29 and that the balance due for the unpaid and unreturned products is \$57,809.01. T. at 20. This evidence was not contradicted by any evidence or testimony from Respondent. As such, Respondent failed to meet its burden of production to dispute the testimony of Appellant and therefore failed to present evidence to contradict the testimony of Appellant.

Respondent has argued that the testimony of Appellant's employee was unbelievable because the statement did not include earlier paid invoices. The fact that Appellant did not include earlier paid invoices in its statement produced at trial was explained and not contradicted. See T. at 20.

Since the evidence is unequivocal and not contradicted at trial, the judgment of the trial court should be reversed and judgment should be entered for Appellant.

Dated this 1 day of oct, 2018.


BY:   
TRACE DILLON  
Bar No. 16857  
P.O. Box 1207  
Buford, GA 30518  
770/513-6400(Office)

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing Response to Motion to Dismiss via first class mail addressed to:

Tucker Player  
1415 Broad River Road  
Columbia SC 29210

Dated this 1 day of octil, 2018.

BY:   
TRACE DILLON  
Bar No. 16857  
P.O. Box 1207  
Buford, GA 30518  
770/513-6400(Office)

**RECEIVED**  
OCT 02 2018  
SC Court of Appeals