

RECEIVED

Jan 13 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY CIRCUIT COURT

Bentley D. Price, Circuit Court Judge

Appellate Case No.: 2020-000932

Miguel Oyuela-Martinez,..... Appellant,

v.

Kuhn & Kuhn, LLC and John Robert Kuhn, Defendants

Of which Kuhn & Kuhn, LLC.....Respondent.

FINAL REPLY BRIEF OF APPELLANT

Kevin B. Smith
SC Bar No: 70587
Amanda R. Itterly
SC Bar No.: 103028
Hoffman Law Firm
7087 Rivers Avenue
N. Charleston, SC 29406
(843) 769-7077
(843)769-4567 (facsimile)
ksmith@hoffmanlawfirm.com
amanda@hoffmanlawfirm.com

Attorneys for Appellant

TABLE ON CONTENTS

TABLE OF CONTENTS..... ii

ARGUMENTS.....1

I. FRAUD WAS NOT DISCOVERED UNTIL AFTER THE COMPLAINT
WAS FILED1

amanda@hoffmanlawfirm.com

Attorneys for Appellant

North Charleston, SC

January 13, 2021