

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

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APR 03 2020

Case No. 2018-CP-40-06344

SC Court of Appeals

Appellate Case No. 2019-001488

M.B. Hutson / M.B. Hudson, Appellant,

v.

Penn America Insurance Co., Global Indemnity Group,
Inc., Timothy J. Newton, Esq., J.R. Murphy, Esq., John
Doe #1, John Doe #2, Respondents,

**RESPONDENTS
J.R. MURPHY AND TIMOTHY J. NEWTON'S
DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents J.R. Murphy and Timothy J. Newton propose the following to be included in the Record on Appeal:

1. Order Granting Defendants Newton and Murphy's Dispositive Motions, filed July 18, 2019;
2. Order Granting Defendants Penn America Insurance Company and Global Indemnity Group, Inc.'s Motion for Summary Judgment, filed July 18, 2019;
3. Summons and Complaint, filed Dec. 5, 2018;

4. Amended Summons and Complaint, filed Dec. 28, 2018;
5. Hutson Exhibits to Amended Complaint, filed Jan. 3, 2019;
6. Defendants Penn America Insurance Company and Global Indemnity Group, Inc.'s Answer, filed Feb. 14, 2019;
7. Motion Hearing Transcript of hearing held June 26, 2019;
8. Motion to Dismiss Respondents Newton and Murphy, filed Feb. 12, 2019;
9. Plaintiff's Memorandum to Defendant's Response, filed May 7, 2019;
10. Memorandum in Support of Defendant Timothy J. Newton's Motion to Dismiss or Motion for Summary Judgment, filed May 30, 2019;
11. Amended Motion, filed by Respondent Newton on June 5, 2019;
12. Reply Memorandum in Support of Defendant Timothy J. Newton's Motion to Dismiss or Motion for Summary Judgment, filed June 13, 2019;
 - a. Newton Exhibits A through CC attached to memoranda supporting his Motion to Dismiss or Motion for Summary Judgment;
13. Defendants Penn America Insurance Company and Global Indemnity Group, Inc.'s Motion for Summary Judgment, filed Jun. 14, 2019;
 - a. Penn America and Global's attached Exhibits A and B;
14. Affidavit of M.B. Hutson, filed June 19, 2019;
15. Supplemental to Memorandum filed by Plaintiff on June 19, 2019;
16. Affidavit of Timothy J. Newton, filed June 24, 2019;
 - a. Exh. 1: copy of court record;
 - b. Exh. 2: court docket
 - c. Exh. 3: Bates labeled copy of Newton Exh. V;
17. Defendant Timothy J. Newton's Amended Response to Plaintiff's Supplemental Memorandum, filed June 25, 2019;
18. Newton Exhibits DD through HH attached to his Amended Response to Plaintiff's Supplemental Memorandum;
19. Memorandum in Support of Motion to Dismiss filed by Murphy on June 25, 2019;
20. Defendants Penn America Insurance Company and Global Indemnity Group, Inc.'s Memorandum in Support of Summary Judgment, filed June 25, 2019.

I certify that this designation contains no matter which is irrelevant to this appeal.

[Signature page follows]

Respectfully submitted,

s/J.R. Murphy

J.R. Murphy, Esquire
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100
Pro se

s/Timothy J. Newton

Timothy J. Newton, Esquire
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100
Pro se

Columbia, South Carolina
April 2, 2020

Other Counsel of Record:

Christian Stegmaier, Esq.
Laura Baer, Esq.
Collins & Lacy, P.C.
1330 Lady Street, Sixth Floor (29201)
P.O. Box 12487
Columbia, South Carolina 29211
Attorneys for Respondents Penn-America Ins. Co. and Global Indemnity Group, Inc.

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M.B. Hutson / M.B. Hudson, Appellant,

v.

Penn America Insurance Co., Global Indemnity Group, Inc.,
Timothy J. Newton, Esq., J.R. Murphy, Esq., John Doe #1, John
Doe #2, Respondents,

PROOF OF SERVICE

I, the undersigned, for Defendant, Timothy J. Newton, do hereby certify that on April 2, 2020, I have served a copy of Respondents J.R. Murphy and Timothy J. Newton's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced case by electronic mail and/or by placing same in the U.S. mail, postage pre-paid to:

M.B. Hutson
P.O. Box 2755
Orangeburg, SC 29116-2755

Appellant Pro se

Christian Stegmaier, Esq.
Laura Baer, Esq.
Collins & Lacey, P.C.
P.O. Box 12487
Columbia, SC 29211
cstegmaier@collinsandlacy.com
lbaer@collinsandlacy.com

*Counsel for Respondents Penn-America Ins. Co
And Global Indemnity Group, Inc.*



Sharon M. Hughes
Paralegal to Timothy J. Newton, Esquire
Murphy & Grantland, P.A.
P.O. Box 6648
Columbia, SC 29260

Columbia, SC
April 2, 2020



MURPHY & GRANTLAND, P.A.

Timothy J. Newton
Direct dial 803-454-1242
tnewton@murphygrantland.com

April 2, 2020

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VIA FACSIMILE 803.734.1839 & U.S.MAIL

Jenny Abbott Kitchings, Clerk of Court
S.C. Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: **MB Hutson/MB Hudson v. Penn America Insurance Company, Global Indemnity Group, Inc., Timothy N. Newton, Esquire, JR Murphy, Esquire, John Doe #1 and John Doe #2**

Civil Action No.: 2018-CP-40-06344
Appellate Case No.: 2019-001488
Our File No.: 1565-0050

Dear Ms. Kitchings:

Please find attached Respondents J.R. Murphy and Timothy J. Newton's Initial Brief and Designation of Matter to be included in the Record on Appeal together with Proof of Service for filing in the above-referenced matter. A hard copy of same has been placed in the U.S. Mail to the South Carolina Court of Appeals pursuant to Rule 262(a)(2), SCACR.

With kind regards, I am

Sincerely yours,

s/Timothy J. Newton

Timothy J. Newton

TJN/smh
Attachments

cc: All Counsel of Record

HP LaserJet 200 colorMFP M276nw

Fax Confirmation

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Apr-2-2020 11:52AM

Job.	Date	Time	Type	Identification	Duration	Pages	Result
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Murphy & Grantland, PA
4406-B Forest Drive (29206)
Post Office Box 6648
Columbia, SC 29260
803.782.4100 | 803.782-4140

fax

TO: Clerk of Court, SC Court of Appeals FROM: Sharon Hughes, Paralegal to Timothy J. Newton

FAX: 803-734-1839 PAGES: 47

PHONE: 803-734-1890 DATE: April 2, 2020

RE: Appellate Case 2019-001488 CC: Names

Urgent For Review Please Comment Please Reply Please Recycle

Comments:

Please see the attached Initial Brief for filing. Any questions or concerns, please contact Sharon Hughes at (803) 782 4100 ext. 1307.

Thank you,

Sharon Hughes



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Murphy & Ginnland, P.A.
 Post Office Box 6648
 Columbia, South Carolina 29240

Jenny Abbott Kitchings, Clerk of Court
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 Post Office Box 11629
 Columbia, SC 29211

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