

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

CP Case No. 2018-CP-400-6344

Appellate Case # 2019-001488

RECEIVED

Dec 10 2020

SC Court of Appeals

MB Hutson/ MB Hudson

Appellant.

v.

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

Respondents.

APPELLANT'S RESPONSE to LETTER FROM RESPONDENTS and
RESPONDENTS' JOINT MOTION TO DIRECT APPELLANT TO CORRECT
RECORD ON APPEAL AND HOLD FINAL BRIEFING DEADLINES IN
ABEYANCE

APPELLANT appreciates the patience of the parties and the court in this matter. Copies were made professionally from an outside company, and an alternative approach to avoid scrambling/misplaced page issues as described in Respondents' Joint Motion, are being implemented to rectify those issues. Appellant did not see missing or scrambled page issues in his copy and further respects the

issues for CP stamping. Downloading all documents used from the Common Pleas Court Public site will assure all copies in this filing will include court authenticated stamping, complete page representation, as filed, and documents for all parties, without any juggled pages.

- Furthermore:
- a) automatic pagination will be implemented,
 - b) a full index added,
 - c) simultaneous digital transmissions will go to all parties to assure uniformity, and
 - d) Appellant's Certification will be included.

These steps should resolve most of the other copy related issues.

After this thorough review, some further clarification is needed for the following:

1. Clarification: "Inclusion of Matter Outside the Designation" (pp.2-10) concerns stated by Respondents and the Court, will be removed from the Record of Appeal. It was mistakenly used by the typist from on-line SC Form 10 (complying with on-line format and sections from the SC Appellate Court on "Appellate's Brief," and as a first time Pro Se, this was not recognized in a timely fashion by me, but will now be removed.
2. Clarification: The email dated August 8, 2016, will be removed, as it was a correct date, but the wrong document.
3. Clarification Section "iv": This is correctly represented. The original document has that 'Title Page' with only the "Exhibit A" heading for the property description used as a divider. The entirety of the Exhibit

“A” is on the following page, followed by Exhibits “B” and “C”. This was authored by the Sellers and is complete, as presented. They did not label “this section intentionally left blank” as standard protocol would require. Nevertheless, I did not feel it appropriate to annotate the document myself.

4. The Transcript will be moved toward the end of the document, for your convenience. In checking the website, transcripts are NOT mandated for the *very* end. However, I will be glad to accommodate you in that regard, for your convenience.
5. Exhibits: All exhibits will be replaced with on-line judicial site downloads, which should, with electronic pagination, filing, and dissemination to all parties, avoid all the other various and unfortunate ‘scrambling’ issues you described.
6. Certificate of Appellant issue will be rectified.
7. Page 8, designation “H” regarding “Case History’ will be clarified to “documents submitted to that court case or generated for (2018-CP-400-6344) (i.e. transcript and pleadings).

I trust this response addresses your collective concerns. I appreciate your guidance and patience with my inexperience in your field of expertise.

December 10, 2020



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Esq., John Doe #1 and John
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Respondents,

PROOF OF SERVICE

I certify that I have served an ELECTRONIC copy of the APPELLATE'S RESPONSE to LETTER FROM RESPONDENTS AND RESPONDENTS' JOINT MOTION TO DIRECT APPELLANT TO CORRECT RECORD ON APPEAL AND HOLD FINAL BRIEFING DEADLINES IN ABEYANCE and a copy of this PROOF OF SERVICE on Christian Stegmaier and Laura Baer (Esq's) for Penn America Insurance Company and Global Indemnity Insurance Company, and also to J. R. Murphy, Esq., and Timothy Newton, Esq. on DECEMBER 10, 2020, at cstegmaier@collinsandacy.com, lbaer@collinsandlacy.com, newton@murphygrantland.com, and jrmurphy@murphygrantland.com.

December 10, 2020



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