

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

MAR 10 2021

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2019-001488  
Civil Action Case No. 2018-CP-40-06344

MB Hutson/MB Hudson, ..... Appellant,

v.


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

**PROOF OF SERVICE**

I hereby certify that I served this **Final Brief of Respondents Penn America Insurance Company and Global Indemnity Group, Inc.** upon all parties, by placing a copy in the United States mail, postage prepaid, and /or on March 8, 2021, addressed to the following:

MB Hutson/MB Hudson  
Post Office Box 2755  
Orangeburg, SC 29116  
***Pro Se Appellant***

John R. Muprhy, Esquire  
Timothy J. Newton, Esquire  
Murphy & Grantland, P.A.  
Post Office Box 6648  
Columbia, SC 29260  
***Pro Se Respondents***



CHRISTIAN STEGMAIER

LAURA R. BAER

Attorneys for Respondents Penn America Insurance  
Company and Global Indemnity Group, Inc.



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

RECEIVED

MAR 10 2021

SC Court of Appeals

March 8, 2021

**VIA U.S. MAIL AND EMAIL**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: MB Hutson/MB Hudson v. Penn America Insurance Company, Global Indemnity Group, Inc., Timothy J. Newton, Esq., J.R. Murphy, Esq., John Doe #1, and John Doe #2**  
**Appellate Case No. 2019-001488**  
**Claim No. 16011284**  
**C&L File No. 000774-01021**

Dear Ms. Kitchings:

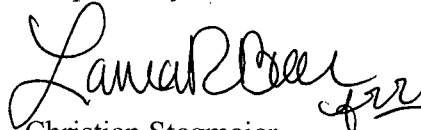
Please find enclosed for filing the unbound original and one bound copy of the Final Brief of Respondents, together with the Proof of Service and Certificate of Counsel in the above referenced matter.

Pursuant to the Supreme Court’s Amended Order “re: Operation of the Appellate Courts During the Coronavirus Emergency” (2020-05-29-02, Appellate Case No. 2020-000447), we have not included any additional copies. If any additional copies are required, please let us know.

By copy of this letter, we are serving same on all counsel of record and on Appellant *pro Se*.

Thank you for your attention to this matter.

Respectfully,

  
Christian Stegmaier

CS/net  
Encl.

cc (via U.S. Mail and email):

M. B. Hutson, Appellant *pro Se*  
John Robert Murphy, Esquire, Murphy & Grantland, P.A.  
Tim Newton, Esquire, Murphy and Grantland, PA

RECEIVED

MAR 10 2021

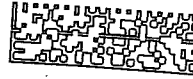
SC Court of Appeals

Hasler

PRIORITY MAIL

03/08/2021

US POSTAGE \$008.55<sup>00</sup>



ZIP 29201  
011E11673897

Collins  Lacy  
ATTORNEYS AT LAW

1330 Lady Street, Sixth Floor (29201) Post Office Box 12487 | Columbia, SC 29211

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

774-1021



USPS TRACKING #



9114 9023 0722 4761 1214 66

Label 400 Jan, 2013  
7680-16-000-7948