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Mar 19 2021

SC Court of Appeals

From: Mr. H
To: Lbaer@collinsandlacy.com; Court Of Appeals Filings; Christian Penn Amer; Tim J. Newton; jimurphy@murphygrantland.com
Subject: Amended, Corrected, Complete Record on Appeal #2019-001488
Date: Friday, March 19, 2021 1:37:08 PM

Notes inserted in your email as a specific reply:

We have reviewed the three e-mails you sent yesterday and the revised Amended Record you provided, as well as consulted with counsel at Murphy & Grantland. As an initial matter, it appears that the two volume version you provided does not address the actual issue that the Court of Appeals was requesting be addressed, which is that the volumes exceed 250 printed pages. **A three volume version has already been prepared that does limit pages to double sided 250 pp. and will be sent out Saturday of this week.** Based upon the size of the Record, it will necessarily require the filing of three volumes. All you have to do is combine the four volumes you submitted the Court previously on February 22 and then redistribute them so that the volumes do not exceed 250 pages when printed double-sided (i.e., 500 pages per PDF). **Please note that this suggestion would not work in three volumes as you suggested as you cite below a page number over 1500.**

Further, upon closer review we see that you made substantive changes to the Record, including removal and renumbering of various items. **Conversation with the court already clarified that duplicates of documents need not be represented and can be removed. Those specific documents are named and the first copy name and page number is clearly noted.** The result of this is that the references to the Record in our final briefs (already filed with the Court) will be inaccurate and would have to be redone and refiled. **I must ask how and why you would complete and file your final brief prior to the court approving the Record on Appeal?** You have also added commentary in the Index **Said commentary was merely to assure all parties that no document was "removed" from the record, but that viewing it would be redirected so that "NO UNNECESSARY" papers are filed...as outlined in the Certification.** and some of the Record pages themselves. This does not appear to be what the Court of Appeals was requesting and we cannot consent to such a submission, which would require us to expend additional time and expense on behalf of our clients. **As stated above, the court stated that duplicate exhibits could be removed. I regret that any parties' completing and filing(s) of a final brief prior to a Record of Appeal being approved by the court (which due date I am well within) is causing your associates page corrections is causing them any time, but their actions were obviously premature. However, it is my clear understanding that all parties have twenty (20) days after the acceptance /filing of the Record of Appeal to submit their final briefs. If you know otherwise, please cite the rule.**

No revisions need or should be made to content of the Record. **The only revisions made were to eliminate copies that did not meet with the "Certification" statement and court clarification was secured on deleting exhibit duplications.** We withdraw our prior suggestion that you remove for printing pages 727-928 of the Record, as this seems to be too confusing to accomplish. **The new Index: A) removes your previously stated concerns by 1) ordering T Newton's ejects numerically; 2) adding the Clarendon County Court Roster; B) notes in specific locations where the full document can be viewed for convenience, and C) renumbers closing items on page "v" of the Index below the removed documents. These changes should make locating documents less confusing for all parties.** Rather, the only revision that we consent to being made are those to the Index noted below. If you decide not to make those revisions to the Index, that's fine; the Court will figure it all out when they review the Appendix to the Record.

Please also note that this recently revised ROA includes a document inadvertently omitted, and had incorrectly assigned Exhibits "A" and "B" which I sorted and corrected. Going backwards would not correct that issue, which has been corrected in the new 3 binder document I am completing, which

represents an unnoticed error that I caught and you had overlooked in your recommendations (#'s 17-18)-
-just prior to the Transcript.

MUST I remind you and your fellow Respondents (all of which are former or current counsel for Penn
America Insurance Company and Global Indemnity Group, Inc.) that their entire filings from the start are
cloaked with fraud upon the Court and myself due to the absolute fact that all of your fellow attorneys (
Respondents) had copies of every filing that TLC Holdings LLC's attorneys filed. Those consist of some
10,000 pages. This includes all the papers your fellow attorneys filed. NO ONE can cite or prove that
ANY attorney-- ever once-- filed a report in writing to the Tribunal regarding those 77 counts of fraud and
extrinsic fraud cited by attorney Laura Paton (who was paid by PAGI) and working through Murphy
Grantland , P.A., and specifically under Tim Newton, Esq.. As you are aware, all attorneys were/are
obligated to report fraud (as required by some (50) rules and laws) that I have cited. Your fellow
attorneys should be thrown out of the Common Pleas and the Honorable Appeals Court for fabricating
total lies as to why my prior cases were thrown out. You know it was due to the extrinsic fraud. I can't
understand why the Honorable Appeals Court has not thrown them all out and reported them to the
Attorney General's office. It would be appropriate for them to all be disbarred. You and your group will
never trick the Honorable Judges who will hear this case. Why not focus more on that than trying to make
it hard on me to produce this record of appeal just the way you want it. All of you, now, are liars to the
Honorable Court . . . you know that! You all are a disgrace to honesty and justice for all. MB Hutson

A complete, coherent, Index and ROA will follow today. --MBHutson

AFFIDAVIT of Timothy Newton (filed 6/24/19) 724
Corrected Exhibit #1: See "Appendix to the Record" below.....1342
Exhibit #2: See "Appendix to the Record" below. 1698

19. CERTIFICATE OF COMPLIANCE. 1341

APPENDIX TO THE RECORD. 1342

(To be submitted by a Respondent, (at their request and with
Appellant's permission per Rule 212), which was inadvertently
left out of the record):

**Exhibit 1 to Affidavit of Timothy Newton: “Bates stamped document EJECT_00001 thru
EJECT_000356”**

Exhibit 2 to Affidavit of Timothy Newton: “Clarendon County Public Index,” filed June 25, 2019

We hope this assists you as you finalize the Amended Record on Appeal for re-filing with the Court. If you have questions, we encourage you to seek guidance from the Clerk of Court or an attorney.

Many thanks,

Laura

Appellant's comprehensive Record of Appeal will follow today. -MBH