

**RECEIVED**

**Mar 31 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Michael G. Nettles, Circuit Court Judge

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

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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.

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**RESPONDENTS’ THIRD JOINT MOTION FOR CORRECTION AND  
CLARIFICATION OF THE RECORD ON APPEAL**

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Pursuant to Rule 210 of the South Carolina Appellate Court Rules and all other applicable authority, Respondents Penn America Insurance Company and Global Indemnity Group, Inc. (“Respondents PAIC”), Timothy J. Newton (“Newton”) and J.R. Murphy (“Murphy”) (collectively “Respondents”), jointly move this Court for an Order regarding correction and clarification of the Record on Appeal. In support thereof, Respondents state as follows:

1. The Record on Appeal in this matter was originally due to be served upon Respondents on September 8, 2020.

2. On September 8, 2020, Appellant delivered a large stack of documents to Respondents. However, the content and format of the Record prepared by Appellant were deficient in numerous respects.

3. Despite Respondents' efforts to alert Appellant to the defects in the Index and Record, Appellant refused to make any changes absent a Court Order. Accordingly, on September 25, 2020, Respondents filed their First Motion to Correct Record on Appeal with this Court.

4. On November 30, 2020, this Court granted Respondent's First Motion to Correct Record on Appeal "in its entirety." The Order provided Appellant thirty days from the date of the Order to serve and file a Record on Appeal that complies with the South Carolina Appellate Court Rules.

5. On December 16, 2020, Appellant filed his next attempt at an Index and Record on Appeal, which was again deficient, as it contained improper argument, failed to include material that was properly designated by Respondents, included material not properly designated by any party, and the page references were inconsistent and inaccurate.

6. Accordingly, on December 17, 2020, Respondents filed their Second Motion to Correct the Index and Record on Appeal with this Court.

7. On January 29, 2021, this Court granted Respondent's Second Motion to Correct the Record on Appeal, providing Appellant thirty (30) days to "serve and file a record on appeal that includes all matters properly designated by all the parties. The record shall not include any matter not properly designated by the parties and presented to the lower court."

8. On February 22, 2021, Appellant filed an Amended Index and Record on Appeal, which consisted of four volumes and totaled 1,341 pages. Respondents reviewed the same and noted two deficiencies in the content of the Amended Record. Specifically, Exhibits #1 and #2 to the

Affidavit of Timothy Newton were either provided only in part or missing from the Amended Record. Nevertheless, in an effort to move this case forward, Respondents communicated with Appellant regarding and prepared a supplement to the Amended Record in the form of an Appendix, which provided complete copies of the exhibits at issue. Respondents filed the Appendix to the Amended Record on February 25, 2021.

9. Pursuant to Rule 211 of the South Carolina Appellate Court Rules, Respondents proceeded with filing their final briefs on March 8, 2021, within twenty (20) days after the service of the Record on Appeal.

10. On March 11, 2021, the Clerk of the Court of Appeals sent two letters. The first letter was a deficiency letter to Appellant indicating that the Amended Record was deficient in that it exceeded the per volume page limit of 250 sheets of paper, which is 500 printed pages per volume if printed double-sided. The letter stated that the deficiency must be corrected within ten days of the date of the letter or the appeal would be dismissed. The second letter was directed to all parties and specified that in addition to an electronic or unbound paper copy the record on appeal and final briefs, the parties were required to file one bound paper copy of the record on appeal and final briefs.<sup>1</sup>

11. On March 12, 2021, Respondents notified Appellant of the correspondence from the Court and suggested that in the process of reconfiguring the volumes of the Amended Record (1) the Index could be updated to correct the numbering on the last page and reference the complete content of the Appendix; and (2) the partial version of Exhibit 1 to the Newton Affidavit, Record

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<sup>1</sup> Respondents were aware of the requirement to file a bound copy of the final briefs and had mailed the same to the Court on or about March 8, 2021. In response to the deficiency letter, a bound copy of the Appendix to the Amended Record on Appeal was mailed to the Court on March 19, 2021.

pages 727-928, which was now contained in the Appendix to the Record, could be excluded from the Amended Record to save on printing costs, with a notation on the Index regarding the same. (See **Exhibit A**, Baer and Newton E-mails to/from Hutson, Mar. 12, 2021).

12. On March 17, 2021, Appellant provided via e-mail a revised Amended Record, which consisted of two volumes and totaled 1,236 pages. The revised Amended Record was sent in two PDFs: the first was 678 pages in length (containing a cover page, Index, and Record pages 1-672); and the second was 564 pages in length (containing Record pages 673-1236).

13. On March 18, 2021, after spending several hours comparing the Amended Record filed on February 22, 2021, to the revised Amended Record supplied on March 17, 2021, Respondents determined that the numerous discrepancies between the two were the result of Appellant unilaterally removing what he viewed as duplicate documents throughout the record. Counsel noted these discrepancies in an e-mail to Appellant on March 18, 2021, as well as the fact that Appellant failed to address the excess pages per volume, which is the sole matter that the Court directed be addressed. Thus, Respondents requested Appellant address only the length of each volume of the record and not make any alterations to the content of the record. (**Exhibit B**, Baer e-mail to Hutson, Mar. 18, 2021). Mr. Hutson provided a lengthy and snide response by e-mail on March 19, 2021, but stated at its conclusion that “a complete, coherent, Index and ROA will follow today.” (**Exhibit C**, Hutson e-mail to Baer, Mar. 19, 2021).

14. On the afternoon of March 19, 2021, Appellant provided via e-mail another revised version of the Amended Record, which consisted of three volumes and totaled 1,351 pages. This version was comprised of four PDFs, the second volume having been split into parts A and B due to size for e-mail transmission: the first was 498 pages in length (containing the Index and Record pages 1-493); parts A and B of the second were a combined 500 pages in length (containing Record

pages 494-993); and the third was 358 pages in length (containing Record pages 994-1351). Respondents again painstakingly reviewed the content of this iteration of the Amended Record, and identified the following substantive changes to the Amended Record, which were not directed by the Court or consented to by the parties:

- a. Appellant added comments within the body of the Amended Record on pages 197, 594, 838, 841, 842, 843, 845, 846, 856, 935, 951, and 952, noting the location of other documents and his removal of certain documents he viewed as duplicative.
- b. Appellant added additional portions of Exhibit #1 to the Newton Affidavit into the Amended Record but excluded those pages bates-labeled EJECT 46-85, EJECT 156-175, EJECT 180-181, EJECT 185-186, EJECT 188-194, EJECT 196-208, EJECT 211-216, EJECT 218-229, EJECT 240-271, EJECT 349, and EJECT 353; and
- c. Appellant excluded from the Amended Record a portion of Exhibit #3 to the Newton Affidavit bates-labeled Exh\_V\_08 to \_13.

In addition to the prejudicial effect of the removal of these pages from the Record on Appeal, these changes altered the page numbering of the record from pages 594 through the end of the Amended Record.

15. On March 19, 2021, Appellant filed a Proof of Service of the [Amended] Record on Appeal, indicating that the same was divided into the 3 “binders,” which Respondents believe refers to the version e-mailed to them on March 19, 2021.

16. As it stands, it is unclear to Respondents what version or versions of the Amended Record on Appeal have been digitally filed or submitted in hardbound copy to the Court. It is quite possible that these versions are not consistent with one another.

17. The Final Briefs of Respondents were prepared based upon the content and pagination of the Amended Record on Appeal filed on February 22, 2021.

18. Having already expended significant time and resources sorting through the various iterations of the record that Appellant has served and/or filed over these past seven (7) months,

Respondents should not now have to amend their final briefs to comport with a new version of the Amended Record on Appeal, particularly where substantive changes in the content and pagination of the record were not directed by the Court or agreed to by the parties.

Based upon the foregoing, Respondents respectfully request that this Honorable Court:

(1) clarify that the Amended Record on Appeal filed February 22, 2021 and Appendix to the Amended Record on Appeal filed February 25, 2021, are the operative filings of the record in this matter, such that Respondents need to file any amended final briefs; and

(2) direct Appellant to file a bound, printed copy of the Amended Record on Appeal consistent with the pagination and content of the Amended Record on Appeal filed on February 22, 2021, with the exception that the individual volumes should not exceed 250 printed pages; and

(3) strike or otherwise not consider any version of the record filed by Appellant that is not consistent with the version filed on February 22, 2021.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

*s/Christian Stegmaier* \_\_\_\_\_

CHRISTIAN STEGMAIER

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LAURA R. BAER

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(803) 255-0404 (phone)

(803) 771-4484 (fax)

ATTORNEYS FOR RESPONDENTS PENN  
AMERICA INSURANCE COMPANY AND  
GLOBAL INDEMNITY GROUP, INC.

*s/John R. Murphy (with permission)* \_\_\_\_\_

JOHN R. MURPHY, ESQUIRE

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(803) 782-4100

*PRO SE* RESPONDENT

*s/Timothy J. Newton (with permission)* \_\_\_\_\_

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*PRO SE* RESPONDENT

**RESPONDENTS' THIRD JOINT MOTION  
THIRD JOINT MOTION FOR CORRECTION  
AND CLARIFICATION OF THE RECORD ON  
APPEAL**

Columbia, South Carolina

Dated: March 31, 2021

**CERTIFICATE OF SERVICE**

I, the undersigned, attorney for Respondents Penn America Insurance Company and Global Indemnity Group, Inc., do hereby certify that I have this date served the foregoing RESPONDENTS' THIRD JOINT MOTION FOR CORRECTION AND CLARIFICATION OF THE RECORD ON APPEAL by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, and via electronic mail, addressed to the following:

MB Hutson/MB Hudson  
Post Office Box 2755  
Orangeburg, SC 29116  
[hutson4444@gmail.com](mailto:hutson4444@gmail.com)  
[Hmr226621@gmail.com](mailto:Hmr226621@gmail.com)  
*Pro Se Appellant*

*s/ Christian Stegmaier*  
\_\_\_\_\_  
CHRISTIAN STEGMAIER  
S.C. Bar No. 68648  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
LAURA R. BAER  
S.C. Bar No. 101076  
[lbaer@collinsandlacy.com](mailto:lbaer@collinsandlacy.com)  
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P.O. Box 12487  
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(803) 255-0404 (phone)  
(803) 771-4484 (fax)

ATTORNEYS FOR RESPONDENTS PENN  
AMERICA INSURANCE COMPANY AND  
GLOBAL INDEMNITY GROUP, INC.

Dated: March 31, 2021

# **EXHIBIT A**

From: Tim J. Newton <tnewton@murphygrantland.com>  
Sent: Friday, March 12, 2021 1:58 PM  
To: Laura R. Baer; hutson4444@gmail.com  
Cc: Christian Stegmaier; J. R. Murphy  
Subject: RE: MB Hutson v. Penn America - 2019-001488 - Correspondence from Court re: Record and Briefing

Mr. Hutson,

Newton and Murphy consent to Penn-America's proposal concerning the requisite amended and re-filed Record on Appeal.

Please note that this proposal is made pursuant to the Appellant Court Rules because only you are required to file the ROA, but it must contain material all parties designate. Nothing in this e-mail or the below e-mail constitute "legal advice" to you. We are merely attempting to follow the applicable procedural rules.

Tim N.

---

From: Laura R. Baer <lbaer@collinsandlacy.com>  
Sent: Friday, March 12, 2021 1:49 PM  
To: hutson4444@gmail.com  
Cc: Christian Stegmaier <cstegmaier@collinsandlacy.com>; Tim J. Newton <tnewton@murphygrantland.com>; J. R. Murphy <jrmurphy@murphygrantland.com>  
Subject: RE: MB Hutson v. Penn America - 2019-001488 - Correspondence from Court re: Record and Briefing

Good afternoon, Mr. Hutson,

We received the attached correspondence yesterday afternoon from the Court. We expect you have or will receive the same via U.S. Mail.

As specified in the Court's letter, the Court is requiring the final briefs be provided to the Court (1) in either electronic or unbound paper form AND (2) one bound paper copy. We were aware of the Court's requirement to submit an additional bound copy of the final brief, so we have already submitted ours to the Court. If you have not submitted them already, your final brief and final reply briefs are due to the Court today.

The Court is also requiring submission of the Record on Appeal in electronic or unbound paper form AND one bound paper copy. As noted in the other letter from the Court, the volumes of the brief must not exceed 250 pieces of paper (meaning a single volume can contain 500 printed pages *if printed front and back*). We will submit the Appendix to Amended Record on Appeal to the Court in this format, as we have not done so previously. We trust that you will do the same for the Amended Record on Appeal itself. The four parts you previously divided the 1348-page Amended Record into were 544 pages, 319 pages, 427 pages, and 58 pages. Hopefully you can restructure the division of these into 3 printed volumes, if you print back and front. Keep in mind that each Volume of the Record needs to have the cover page, and I typically label it as ""Volume # of #" in the top right corner of the cover and include the Index at the front of each Volume. This is important, as it impacts the number of pages of content you can place behind the cover and Index and stay within the 250-page limit. It appears you have until March 21<sup>st</sup> to provide the Amended Record on Appeal to the Court in its restructured format.

Additionally, if you would like to correct/update the Index to the Amended Record on Appeal, you could do so to reflect the following:

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**

Additionally, unless it would make it too complicated, you could omit from the Amended Record the pages you have bates-stamped 727-928, as we are providing Exhibit 1 in its entirety and in order in the Appendix. We suggest it because it would decrease print costs. If you do this, we would also suggest the addition of a footnote in the Index stating: "The pages originally bates-stamped as pages 727-928 of the Amended Record are omitted, as the complete Exhibit 1 to the Newton Affidavit is provided in the separately filed Appendix."

If you have questions about any of the above, we encourage you to reach out to the Clerk's Office at the Court of Appeals.

Best,  
Laura

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From: Singleton, Mary C. <[msingleton@sccourts.org](mailto:msingleton@sccourts.org)>  
Sent: Thursday, March 11, 2021 4:34 PM  
To: Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; 'tnewton@murphygrantland.com' <[tnewton@murphygrantland.com](mailto:tnewton@murphygrantland.com)>; 'jrmurphy@murphygrantland.com' <[jrmurphy@murphygrantland.com](mailto:jrmurphy@murphygrantland.com)>; Laura R. Baer <[lbaer@collinsandlacy.com](mailto:lbaer@collinsandlacy.com)>  
Cc: State Filing <[statefiling@collinsandlacy.com](mailto:statefiling@collinsandlacy.com)>; 'shughes@murphygrantland.com' <[shughes@murphygrantland.com](mailto:shughes@murphygrantland.com)>; 'sbranson@murphygrantland.com' <[sbranson@murphygrantland.com](mailto:sbranson@murphygrantland.com)>  
Subject: MB Hutson v. Penn America - 2019-001488

Dear Counsel:

Attached please find correspondence from the Court of Appeals.

Sincerely,

Mary Caitlyn Singleton  
Appeals Specialist  
SC Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

Ph: (803) 734-1890

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**Laura R. Baer**

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**Confidentiality Note:** The preceding email message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message. Legal advice contained in the preceding message is solely for the benefit of the Collins and Lacy, P. C. client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party.

From: Laura R. Baer  
Sent: Friday, March 12, 2021 2:48 PM  
To: H Hutson  
Cc: Christian Stegmaier; Tim J. Newton  
Subject: RE: Response to your email today.

Hi Mr. Hutson,

I did not see that the 21<sup>st</sup> was a Sunday; that would be correct that the deadline moves to the next business day, which is March 22.

Laura

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From: H Hutson <hutson4444@gmail.com>  
Sent: Friday, March 12, 2021 2:45 PM  
To: Laura R. Baer <lbaer@collinsandlacy.com>; Tim J. Newton <tnewton@murphygrantland.com>  
Subject: Response to your email today.

I have not received the deficiency letter from the Court. I telephoned them a few minutes ago and clerk said that the deficiency letter went out yesterday. Date to comply is March 22, 2021 according to the clerk.

MB Hutson

--

803-308-2714

# **EXHIBIT B**

From: Laura R. Baer  
Sent: Thursday, March 18, 2021 1:11 PM  
To: Mr. H; hutson4444@gmail.com  
Cc: Tim J. Newton; jrmurphy@murphygrantland.com; Christian Stegmaier; Natalia V. Ertseva-Thomas  
Subject: Appellate Case. No. 2019-1488, Revised Record on Appeal

Dear Mr. Hutson,

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. 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).

Further, upon closer review we see that you made substantive changes to the Record, including removal and renumbering of various items. 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. You have also added commentary in the Index 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.

No revisions need or should be made to content of the Record. 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. 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.

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

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From: Mr. H <hmr226621@gmail.com>  
Sent: Wednesday, March 17, 2021 2:07 PM  
To: Laura R. Baer <lbaer@collinsandlacy.com>; Tim J. Newton <tnewton@murphygrantland.com>;  
jrmurphy@murphygrantland.com; Christian Stegmaier <cstegmaier@collinsandlacy.com>  
Subject: Two ROA typos:

Index pp. "v." changes:

1. Transcript FROM page 1277 TO 1172
2. Certificate of Compliance FROM page 1375 TO 1236

MBH

# **EXHIBIT C**

From: Mr. H <hmr226621@gmail.com>  
Sent: Friday, March 19, 2021 1:37 PM  
To: Laura R. Baer; ctappfilings@sccourts.org; Christian Stegmaier; Tim J. Newton; jrmurphy@murphygrantland.com  
Subject: Amended, Corrected, Complete Record on Appeal #2019-001488

**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) rennumbers 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**