

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Apr 12 2021

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
The Honorable Robert E. Hood, Circuit Court Judge

Appellate Case No. 2020-001708
Civil Action Case No. 2020-CP-40-03810

Penn America Insurance Company and Global Indemnity Group, Inc.,

Plaintiff/Counter-Defendants,

v.

Morris Beach Hutson a/k/a M.B. Hutson,

Defendant/Counter-Plaintiff,

AND

Morris Beach Hutson a/k/a M.B. Hutson,

Third-Party Plaintiff,

v.

Timothy J. Newton, Esq.; Murphy & Grantland, P.A.; Christian Stegmaier, Esq.;
and Collins & Lacy P.C.,

Third-Party Defendants.

of whom Morris Hutson is the Appellant,

and Penn America Insurance Company; Global Indemnity Group, LLC; Timothy J. Newton, Esq.; Murphy & Grantland, P.A.; Christian Stegmaier, Esq.; and Collins & Lacy P.C. are the Respondents.

**RESPONDENTS PENN AMERICA INSURANCE COMPANY, GLOBAL
INDEMNITY GROUP, INC., CHRISTIAN STEGMAIER, ESQ., AND COLLINS
& LACY P.C.'S RETURN TO APPELLANT'S MOTION TO EXCEED PAGE
LIMITS FOR HIS "REPLY BRIEF"**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Respondents Penn America Insurance Company (“Penn America”), Global Indemnity Group, Inc. (“Global”), Christian Stegmaier, Esq. (“Stegmaier”); and Collins & Lacy P.C. (Collins & Lacy) (collectively “these Respondents”), pursuant to Rule 240, SCACR, file this return in Opposition to Appellant’s “Motion to Allow Eight Additional Pages to Appellate’s[sic] Reply Brief,” and in support thereof states the following:

Appellant Hutson filed his purported “reply brief” on March 10, 2021. These Respondents filed a Motion to Strike the reply brief, and two additional filings of Appellant, on March 22, 2021. On March 31, 2021, Appellant filed an untimely a motion to exceed the page limits for his reply brief.

Appellant’s filing exceeds the 25-page limit for reply briefs provided in Rule 208(b)(5), SCACR. Appellant’s newly filed motion to exceed the page limits sets forth no basis for granting the motion or certification that Appellant first attempted to draft his filing in compliance with the page limits. As discussed more fully in the motion to strike, the content of Appellant’s response is primarily a regurgitation of matters previously set forth in his initial brief, in addition to improper assertions and arguments. Notably, Appellant also exceeded the page limits with respect to his reply brief in appellate case no. 2019-001488, similarly filed a motion to exceed page limits without any basis for the same, and the motion was denied. Accordingly, Appellant’s motion to exceed the page limits should be denied.

CONCLUSION

Based upon the foregoing, these Respondents respectfully requests that this Honorable Court deny Appellant’s motion to exceed the page limits for his reply brief.

Respectfully submitted,
COLLINS & LACY, P.C.

s/Christian Stegmaier

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**RESPONDENTS PENN AMERICA
INSURANCE COMPANY, GLOBAL
INDEMNITY GROUP, INC., CHRISTIAN
STEGMAIER, ESQ., AND COLLINS &
LACY P.C.’S RETURN TO
APPELLANT’S MOTION TO EXCEED
PAGE LIMITS FOR HIS “REPLY BRIEF”**

Columbia, South Carolina
April 12, 2021

CERTIFICATE OF SERVICE
(Appellate Case No. 2020-001708)

I, the undersigned, attorney for Respondents Penn America Insurance Company, Global Indemnity Group, Inc., Christian Stegmaier, Esq., and Collins & Lacy, P.C. do hereby certify that I have this date served the foregoing **Respondents Penn America Insurance Company, Global Indemnity Group, Inc., Christian Stegmaier, Esq., And Collins & Lacy P.C.’S Return to Appellant’s Motion to Exceed Page Limits for His “Reply Brief”** upon all parties, by electronic mail and/or by placing a copy in the United States mail, postage prepaid, on April 12, 2021, addressed to the following:

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s/Christian Stegmaier

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Dated: April 12, 2021