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Jun 01 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Case No. 2018-CP-400-6344  
Appellate Case # 2019-001488

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.

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APPELLANT'S **MOTION** TO ALLOW APPELLANT TO FILE AMENDED REPLY BRIEFS FOR PENN AMERICA-GLOBAL INDEMNITY INSURANCE AND MURPHY GRANTLAND's, TIMOTHY NEWTON, ESQ. & J.R. MURPHY, Esq. PAST THE DEADLINE DUE TO FAMILY MEDICAL EMERGENCY

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Comes now Appellant who asks permission for the Amended Reply Briefs to be accepted with a Fifty Dollar (\$50) Motion Fee due to an emergency situation that prevented Appellant having time to properly file same in a timely manner.

For the record, the emergency was created by Appellant's typist who was notified that her only son needed critical, life-threatening, stage four cancer surgery, chemo and radiation treatments of the mouth / tongue, at Prisma in Greenville, SC.

Appellant has had no other typist and has several on ongoing cases involving fraud, extrinsic fraud upon the Honorable Judges and Courts, deception, misrepresentation and violation of multiple rules of SCRPC by Respondents.

Respectfully submitted June 1, 2021

s/ M B Hutson  
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