

**RECEIVED**  
**Jun 10 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  
Judge Robert Hood, Fifth Circuit

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Case # 2020-CP-400-3810

Appellate # 2020-001708

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Penn America Insurance Company and	)	
Global Indemnity Group, LLC,	)	
Plaintiffs/Counter-Defendants,	)	
	)	
v.	)	
	)	
Morris Beach Hutson a/k/a M.B. Hutson,	)	
Defendant/Counter-Plaintiff,	)	Appellant's Request
	)	
AND	)	
	)	
Morris Beach Hutson a/k/a M. B. Hutson,	)	(1) Request for the Court to have
Third Party Plaintiff,	)	<u>Respondents correct their filing of</u>
	)	<u>June 8, 2021</u> , and
v.	)	
	)	
Penn America Ins. Co. & Global	)	
Indemnity Group, LLC, Timothy J.	)	2) Request for a 30 day Extension
Newton, Esq. of Murphy Grantland, P.A.;	)	of Time, and
& Christian Stegmaier, Esq. of Collins &	)	
Lacy P.C.,	)	
Third Party Defendants,	)	3) all responses from Appellant fall
	)	under a granted 30 day extension.
of whom Morris Hutson is the Appellant,	)	
	)	
and Penn America Ins. Co. & Global	)	
Indemnity Group, LLC, Timothy J.	)	
Newton, Esq., of Murphy Grantland,	)	
P.A., & Christian Stegmaier, Esq. of	)	
Collins & Lacy P.C., are the	)	
Respondents.	)	

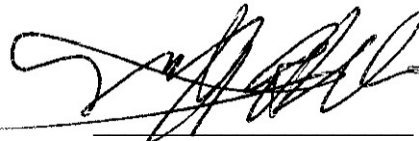
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Appellant requests that Respondents correct their last filing (Cover letter dated June 8, 2021) within ten ( 10 ) days, wherein their cover letter, cites case # 2019-CP-40-06344, and their enclosed MOTION cites case #'s 2020-001708 and 20200-CP-40-03810.

Appellant, for the first time in this case, asks the Honorable Appeals Court for a (30) day extension.

Furthermore, Appellant asks that any responses due from the APPELLANT be stayed until the end of an approved 30 day extension.

Respectfully submitted this 10th day of June, 2021.



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Morris Beach Hutson a/k/a M. B. Hutson, )  
Third Party Plaintiff, )  
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v. )  
 )  
Penn America Ins. Co. & Global )  
Indemnity Group, LLC, Timothy J. )  
Newton, Esq. of Murphy & Grantland, )  
P.C.; & Christian Stegmaier, Esq. of )  
Collins & Lacy P.A., )  
Third Party Defendants, )  
 )  
of whom Morris Hutson is the Appellant, )  
 )  
and Penn America Ins. Co. & Global )  
Indemnity Group, LLC, Timothy J. )  
Newton, Esq., of Murphy Grantland, )  
P.C., & Christian Stegmaier, Esq. of )  
Collins & Lacy P.A., are the )  
Respondents. )

PROOF OF SERVICE

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I certify that I have electronically served the **Appellant's Request for a 30 day extension and for Respondents' correction of their June 8, 2021 filing** to the Appellate Court to meet the guidelines for filing during the Corona-virus pandemic and also electronically and respectfully to all parties listed on the Notice of Appeal and their counsel:

(1) Penn America Insurance Company & Global Indemnity Group, LLC, to;  
PAGI's attorneys at Collins and Lacy P.C.:

(a) Christian Stegmaier, Esq. at [cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com); &

(b) Laura Baer, Esq.: at [lbaer@collinsandlacy.com](mailto:lbaer@collinsandlacy.com); and to

(2) T. J. Newton, Esq. at [tnewton@murphygrantland.com](mailto:tnewton@murphygrantland.com);  
J.R. Murphy, at [jrmurphy@murphygrantland.com](mailto:jrmurphy@murphygrantland.com); and

*Pro Se requests that Court **file a copy of the email** bearing this POS as verification of service according to #6 ,(3), lines 6-8 of the March 20-2020 Supreme Court Order.*

on June , 10 2021.

s/ M B Hutson  
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