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**Jun 21 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

Michael G. Nettles, Circuit Court Judge

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Case No. 2018-CP-400-6344

Appellate Case # 2019-001488

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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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APPELLATE'S RESPONSE to "RESPONDENTS' MOTION TO DISMISS AND  
OBJECTION TO APPELLANT'S MOTION TO FILE AMENDED REPLY  
BRIEFS OUT OF TIME"

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Appellant gently reminds this Honorable Court that this Appellant has been defrauded, lied about, and maliciously abused by these Respondents' initial filing for a defense, as all of Respondents' filings were created and falsified and alleged that this Appellant's lost cases were based on frivolous suits created by Appellant to harass. Respondents were, and are, totally cognizant that Appellant lost his suits and defenses due to the Extrinsic Fraud created by TLC Holding's attorneys and

not reported, but *joined and continued by the Respondents*, of which is nothing short of conspiracy and fraud, of which their own attorney (Paton) investigated, disclosed, and reported to them.

Respondents were given cited and listed frauds by PAGO's hired attorney, Laura Paton. Esq., whose documents (outlining of over (77) counts of fraud perpetrated by TLC and their attorneys) have been submitted to this Honorable Court. Additionally, since all Respondent's had copies of these (77) detailed counts of fraud, Respondents had an obligation and a legal duty to report same to the Tribunal (required by 501 canon laws as well as some (55) cited rules created by in the South Carolina Rules of Professional Conduct (SCRPC), 2016 Edition, focused on the conduct of practicing lawyers/attorneys). On many occasions, this Appellant has submitted a list and details of those rules and laws requiring Respondent Attorneys to report such fraud. Instead of clearly recognizing TLC Holding's extrinsic fraud and instead of reporting the same as required, all Respondent's continued to ignore their professional responsibilities to do so and conspired against this Appellant in attempts to speed up his legal doom for the explicit purpose of providing an escape so that PAGO (Insurers) could shirk their responsibility to protect and defend their insured, a non professional layman, now, this Appellant.

All papers filed by any of the Respondents are fraudulent, containing misrepresentations of truth for their own professional protection. Furthermore, Respondents attempt to hide their conspiracy knowing, full well, that if found out they would be in serious trouble, since Appellant is protected by the 501 canon

rules of law, as well as the honorable South Carolina Rules of Professional Conduct -- of which all Respondents have grossly violated.

On June 04, 2021, the Honorable Appeals Court rendered a decision as follows:

**“On May 13, 2021, this office received and filed an amended initial reply brief. However, on May 25, 2021, this's office received another amended initial reply brief. The two initial reply briefs are not the same. Since the initial reply brief of May 13, 2021, was filed and served within the time limits stated in the Court's order, it will be accepted. The initial reply brief filed May 25, 2021, will not be accepted in lieu of the May 13 brief unless a motion is presented to the Court. We are returning your filing dated May 25, 2021, to you”.**

As the record will show, Appellant did not file any motion so the May 13, 2021 stands.

Respondents are simply trying to inject smoke clouds to confuse and distract this Honorable Appeals Court from the real issues:

- a) Respondents are dishonest as they did not report/expose fraud in /upon the court(s),
- b) Respondents are guilty of conspiring with TLC Holdings LLC's attorneys with extrinsic fraud/throwing a jury trial and disgracing this Appellant by intentionally using fraud, misrepresenting and/or intentionally failing to disclose pertinent facts and bad faith to prevent this Appellant from receiving justice and coverage (as the insured) from PAGI, their direct client, and

- c) Now Respondents are side-stepping and allowing Lauren C. Hubbard, Legal Assistant, who prepared the Motion, to put herself in the line of fire... who has a lesser degree of responsibility to report fraud to the authorities (SCRPC).

*SCRPC, Rule 8.3 (b) and cmt.*

*A) "As a self-regulating profession, lawyers are expected to report serious misconduct by other lawyers to appropriate disciplinary authorities. The duty to report the misconduct of others extends even to misconduct by another lawyer in the same firm".*

**South Carolina Rule 8.4. Misconduct**

*(C) "commit a criminal act involving moral turpitude";*

*(D) "engage in conduct involving dishonesty, fraud, deceit or misrepresentation";*

*(E) "engage in conduct that is prejudicial to the administration of justice"*

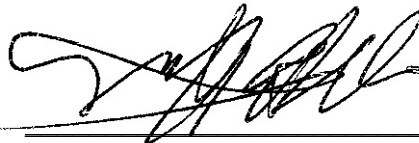
Regarding the bound and filed final record of appeal, Appellant states the following:

1. Appellant is a Pro Se layman. Considering that the Attorney Respondents filed thousands of papers attempting to confuse Appellant and expecting the Honorable Court to require a layman to be perfect in preparing thousands of papers is impossible.

2. Appellant asks the Honorable Court to fully accept all bound copies as a finished product since Appellant has clearly laid out his case with overwhelming evidence and more than adequate to remanded to a jury.
3. Furthermore, Appellant asks this Honorable Court to not allow any further filings on either side and send this case to the Honorable Appellate Judges. Appellant is confident that these Honorable Judges will see right through the misrepresentations and fraud as have been laid out by Appellant. Respondents have simply quoted rules of law that really don't apply to this case in a desperate attempt to hide their guilt.

Appellant again asks this Honorable Court to remand this case back to a jury for Appellant is certain that a jury of 12 can, and will, see right through this scam-defense that Respondents have presented to this court. Appellant asks that this unusual and unlawful case that Respondents have filed be remanded to a jury. Appellant pleads with this Honorable Court not to dismiss or further this case other than sending all finished bound files to the Panel of Judges.

June 21, 2021



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Murphy, Esq., John Doe #1

Respondents,

### PROOF OF SERVICE

I certify that I have electronically served the Appellant's APPELLATE'S RESPONSE to "RESPONDENTS' MOTION TO DISMISS AND OBJECTION TO APPELLANT'S MOTION TO FILE AMENDED REPLY BRIEFS OUT OF TIME electronically to the Appellate Court to meet the guidelines for filing during the coronavirus pandemic and also electronically to all parties listed on the Notice of Appeal:

- (1)Collins and Lacy's: Christian Stegmaier, & Laura Baer;
- (2)Murphy Grantland's JR Murphy & Timothy J. Newton;

[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com); [lbaer@collinsandlacy.com](mailto:lbaer@collinsandlacy.com); [newton@murphygrantland.com](mailto:newton@murphygrantland.com);  
[jrmurphy@murphygrantland.com](mailto:jrmurphy@murphygrantland.com);

**June 21, 2021**

  
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