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Nov 30 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.

APPELLANT'S RESPONSE TO "RESPONDENTS' RETURN TO APPELLANT'S
MOTION TO REINSTATE HIS APPEAL"

Plaintiff has completed his repairs to the Record of Appeal to the Respondents' specifications. Furthermore, Pro Se Appellant believes that he is entitled to be reinstated, as he had delayed responding totally due to his awaiting a request for 'clarification' directly from the court, which did not come. Instead, Appellant received a dismissal order. Knowing then, that clarification above and beyond the Respondents' statements was not coming, Appellant immediately submitted a motion for reinstatement and has completed all Respondents'

recommendations. Appellant does beg the mercy of the court, as some of those issues named by the Respondents were caused by software issues, and were totally unintentional.

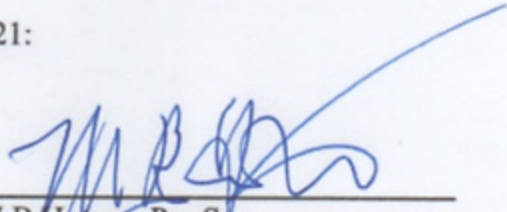
Appellant states that since:

- 1) there was never *anytime* that Appellant intended not to honor *any* Order, and
- 2) he sought official clarification in writing on the Court's Order, which did not come (except as a form of a dismissal), causing a delay in the corrected Record of Appeal, and
- 3) he worked diligently to complete his Corrected/Amended Record of Appeal, and
- 4) he was blind-sighted by software issues, now resolved, and
- 5) he was to file for reinstatement by November 29, 2021, and did so including the corrected Record of Appeal hand delivered to the Honorable Court in Columbia with the \$50.00 motion fee attached.

THEREFORE, Appellant PRAYS that Appellant's

- (1) Motion for Reinstatement be granted by this Honorable Court, and
- (2) Appellant's completed, Corrected and Amended Record, be accepted, as filed.

Respectfully submitted this 30th day of November, 2021:



M B Hutson, Pro Se
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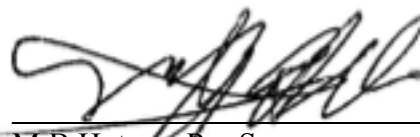
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Respondents.

PROOF OF SERVICE

I certify that I have electronically filed WITH THE APPELLATE COURT, and electronically served a copy of **APPELLANT's Response to Respondents Return to Appellant's Motion to Reinstate His Appeal,** with this PROOF OF SERVICE on Penn America Insurance Company & Global Indemnity Insurance Company's, attorneys of record, Christian Stegmaier and Laura Baer, cstegmaier@collinsandlacy.com and lbaer@collinsandlacy.com, respectively, and also to J. R. Murphy, Esq., and Timothy Newton, Esq. (both acting as Pro Se) at jrmurphy@murphygrantland.com and tnewton@murphygrantland.com, respectively.

November 30, 2021:



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