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Dec 06 2021

SC Court of Appeals

THE STATE OF SOUTH
CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas
Judge Robert Hood, Fifth Circuit

Case # 2020-CP-400-3810

Appellate # 2020-001708

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,)

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.;)
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.)

**APPELLANT'S RESPONSE TO
RESPONDENTS' FIRST
MOTION FOR CORRECTION
OF THE RECORD ON APPEAL
AND REQUEST FOR
ABEYANCE OF FINAL
BRIEFING DEADLINES
IN CONSIDERATION OF
ERRORS WITHIN THE
RESPONDENTS'
RECCOMENDATIONS AND A
NEED FOR TIME FOR
FURTHER COLLABORATION
TO REACH A RESOLUTION.**

DECEMBER 6, 2021

Appellant is in receipt of the Respondents' first Motion for Correction of the Record on Appeal and Request For Abeyance of Final Briefing Deadlines / filed November 8, 2021., and hereby responds:

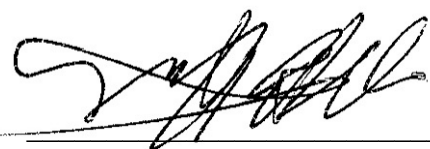
Appellant states that he wishes to CONTINUE this case in the Appellate Court. However, Appellant asks the Honorable Court to be given additional time to resolve requested documents by Respondents, including one which was not filed on-line, nor had he received a copy of, or perhaps it was misdated, namely:"the E-mail from Judge Hood's Chambers requesting draft Orders, October 23, 2020". As Appellant does not have that email and it was not filed on-line in the court.

FUTHERMORE, resolution needs to be obtained on other items:

1. Recommended pagination of 1808 was duplicated in both volumes four (end) and five (beginning). Volume five must begin with page 1809. That change impacts the balance of the Record on Appeal.
2. Page references on i, iii, v, and vi through ix are impacted by the error in # 1 above.
3. Clarification is needed on "Exhibit 7" cited as one page. Appellant cannot locate and labeling of "Exh. 7," cited by respondents Motion to be a one page Exhibit.

Appellant prays that this case be allowed to continue and vows to be expedient in completing any and all corrections, awaiting clarification from Respondents. Appellant's response to Respondents' Motion is hereby made in kind, and he nevertheless, expresses appreciation for their intended thoroughness.

Respectfully submitted this 6th day of December, 2021.



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Timothy J. Newton, Esq.; Murphy
Grantland, P.A.; Christian Stegmaier, Esq.;
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.

PROOF OF SERVICE

FOR

**APPELLANT'S RESPONSE TO
RESPONDENTS' FIRST
MOTION FOR CORRECTION
OF THE RECORD ON APPEAL
AND REQUEST FOR
ABEYANCE OF FINAL
BRIEFING DEADLINES IN
CONSIDERATION OF
ERRORS WITHIN THE
RESPONDENTS'
RECOMMENDATIONS AND A
NEED FOR TIME FOR
FURTHER COLLABORATION
TO REACH A RESOLUTION.**

PROOF OF SERVICE

I certify that I have electronically served the **Appellant's Response to Respondents' first Motoin for Correction of the Record of Appeal & Request for abeyance of Final Briefing Deadlines in Consideration of Errors within the Respondents' Recommendation and a Need for Time for Further Collaboration to reach a Resolution** to all parties and to the Appellate Court to meet the Supreme Court guidelines for filing during the coronavirus period as amended May 29, 2020 (g) (3) lines 6, 7, 8.:

Penn America Insurance Company & Global Indemnity Group, LLC to:

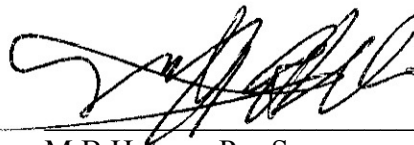
Collins and Lacy P.C.'s Christian Stegmaier, Esq. & Laura Baer, Esq.:

cstegmaier@collinsandlacy.com; and lbaer@collinsandlacy.com; and to

(2) T. J. Newton, Esq., of Murphy Grantland and John Grantland, Esq.,

tnewton@murphygrantland.com; and jgrantland@murphygrantland.com.

Respectfully submitted, December 6th, 2021:



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