

# M B Hutson

1545 Biltmore Street  
Orangeburg, SC 29115

(803) 308 – 2714 cell  
hmr226621@gmail.com

January 24, 2022

Laura Baer, Esq.  
Collins and Lacy  
(via e/mail only to all Respondents and the Appellate Court)

Re: Penn America Ins. Co. and Global Indemnity Group, LLC  
v. Morris Beach Hutson  
Civil Action # 2020-001708

**RECEIVED**

**Jan 24 2022**

**SC Court of Appeals**

Dear Counselor Baer:

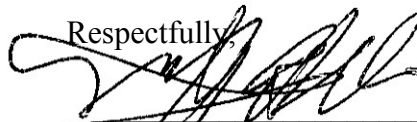
RE: Respondents' REPLY TO APPELLANT HUTSON'S RETURN TO ITS FIRST MOTION FOR CORRECTION OF THE RECORD ON APPEAL AND REQUEST FOR ABEYANCE OF FINAL BRIEFING DEADLINES and ORDER dated January 10, 2022:

Please note that the pagination (see page 2 of your December 10, 2021 filing) contains an error. Document three in your list (namely "Exhibit 13 to Newton and Murphy & Grantland's Memorandum in Support of Motion to Dismiss/Summary Judgment filed Oct. 9, 2020, Exhibit 13: Wilkerson e-mail dated August 31, 2017, and required on your letter (page 2) to be on ROA page 2076, is a TWO PAGE document. You have, however, only allowed one page for this document in your page delineations in your Reply to the Court.

In order to comply with the sequential ordering of pages (as required by the Appellate Court), all this document, as outlined by your section on page two, "Specifically, Volume Six should include the following: ..." pages therein were required to be re-numbered to allow for that additional page (2077). Consequently, Hutson's Motion (item #4) must begin on page 2078, and Exhibit 31 'Transcript' must begin NOT on 2098, but on 2099, throwing Hood's email to page 2427 and the Amended Certificate of Compliance to page 2428. See attachment.

I regret any additional work this may cause you, your colleagues, and your office staff from Respondents' oversight of the two page document. I have included in this email a final, corrected, and correctly paginated copy of Binder Six, which is the only binder directly impacted by your oversight of this two page document. An alternate resolution is welcomed and would be entertained, if feasible and received prior to 1/26/2022.

Respectfully



MB Hutson

cc: T. Newton, Esq., JR Murphy, Esq.,  
J. Grantland, Esq., C. Stegmaier, Esq.,  
Court of Appeals