

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Hon. R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2024-000739

Dorothy Pierce Appellant,

V.

Jerry Edwards, Edwards Group Holdings, Inc., Edwards Printing, Richard Hunt McDuff; MJM Law, LLC; Riley Morningstar; The Journal Newspaper; Hal Welch.. . . . Respondents.

MOTION FOR LEAVE TO AMEND APPELLANT'S RETURN TO RESPONDENTS' MOTION TO DISMISS

The Appellant, Dorothy Pierce, proceeding pro se, respectfully moves this Honorable Court for leave to amend her Return to Respondents' Motion to Dismiss Appellant's Appeal.

1. The Appellant was not served with a copy of the Respondents' Motion to Dismiss until June 26, 2024. This delay impeded the Appellant's ability to comprehensively address the Respondents' Motion to Dismiss in the initial Return
2. The Appellant initially filed a Return on June 10, 2024, which was labeled "Appellant's Motion to Dismiss Respondents' Motion to Dismiss." Subsequently, the court directed the Appellant to file a motion to accept the late filing, which was promptly done.
3. On July 8, 2024, the Appellant filed a document titled "Memorandum in Support of Appellant's Return to Respondents' Motion to Dismiss," supplementing the initial Return. However, the court declined this filing and advised the Appellant to amend her Return to Respondents' Motion to Dismiss instead.
4. On July 17, 2024, the Appellant filed an Amended Return to Respondents' Motion to Dismiss.

5. On July 25, 2024, the court declined to accept the Appellant's filing, stating: "We received your amended return to the respondents' motion to dismiss dated July 17, 2024. As stated in this Court's letter dated July 15, 2024, if you wish to amend your original filing of the return to respondents' motion to dismiss filed on June 10, 2024, you must serve and file a motion pursuant to Rule 240 of the South Carolina Appellate Court Rules (SCACR). This Court declines to consider your amended return to the respondents' motion to dismiss filed on July 17, 2024."
6. Appellant hereby requests this Honorable Court to grant leave to amend her Return to Respondents' Motion to Dismiss to ensure that all relevant arguments and issues are adequately addressed according to Rule 240 of the South Carolina Appellate Court Rules (SCACR).
7. A copy of Appellant's Amended Return to Respondents' Motion To Dismiss is herein attached.

Respectfully Submitted, this July 25, 2024



Dorothy Pierce

750 Mourning Dove Ln.

Seneca, South Carolina 29678

(864) 324-3247

dorothypierce84@gmail.com