

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT OF SOUTH CAROLINA
WRIT OF CERTIORARI
APPEAL FROM South Carolina Court of Appeals
PlanetONE Packaging, LLC, Respondent,
v.
Dorothy Pierce, Appellant.
Appellate Case No. 2024-001156

RECEIVED
Aug 28 2024
S.C. SUPREME COURT

REPLY TO RESPONDENT'S MOTION TO DISMISS

Petitioner Dorothy Pierce respectfully submits this reply to Respondent PlanetONE Packaging, LLC's Motion to Dismiss her Petition for a Writ of Certiorari. Petitioner retrieved Respondent's Return from the Mailbox on August 19, 2024. Respondent's motion is without merit and should be denied for the following reasons: (1) proper service was effected on the Respondent, (2) Respondent's ongoing efforts to frustrate service constitute bad faith, (3) the default judgment in the underlying case constitutes a final judgment, and (4) the Respondent's motion seeks to unfairly disadvantage a pro se litigant who has complied with procedural requirements despite significant challenges.

**A. PETITIONER'S RESPONSE: PROPER SERVICE WAS EFFECTED ON
RESPONDENT**

Respondent's argument regarding improper service is without merit. According to Rule 5(b)(1) of the South Carolina Rules of Civil Procedure (SCRCP), service upon an attorney can be made by "mailing it to the attorney's last known address or, if no address is known, by leaving it with the clerk of court." Additionally, the May 6, 2022, Order of the South Carolina Supreme Court (Order 2022-05-06-04) permits service by email for attorneys who have consented to such service. In this case, Respondent, who is an attorney, was properly served with the petition via email, as this is a standard practice under the SCRCP for attorneys.

Moreover, Respondent's filing of a response to the petition—specifically, this Motion to Dismiss—constitutes acceptance of service. The South Carolina Supreme Court has held in *Stevenson v. Stevenson*, 276 S.C. 475, 279 S.E.2d 616 (1981), that a party's appearance and

response to a motion or petition are sufficient to establish acceptance of service. By responding to the petition, Respondent has effectively acknowledged receipt, rendering their claim of improper service baseless.

Furthermore, it is important to note that Respondent has been notorious for either misrepresenting or failing to acknowledge receipt of mail. Throughout this case, Petitioner has repeatedly faced difficulties in ensuring that Respondent received documents, as Respondent has frequently claimed not to have received mail, even when tracking information and other evidence indicated otherwise. This pattern of behavior undermines Respondent's credibility and suggests a deliberate attempt to frustrate the legal process. Respondent's repeated denials of receipt, even in the face of substantial evidence to the contrary, reflect a strategy aimed at obstructing Petitioner's efforts to comply with procedural requirements.

Given Respondent's history of misrepresenting or denying receipt of mail, their current claim of improper service should be viewed with skepticism. The court should recognize that Respondent's conduct has consistently hindered the timely and fair resolution of this case. Accordingly, the argument of improper service should be dismissed, and the court should proceed with a review of the substantive issues raised in the petition.

B. PETITIONER FULLY COMPLIED WITH COURT REQUIREMENTS WHILE RESPONDENT OBSTRUCTED EVERY LEGAL PROCESS.

During the court hearing, the judge explicitly instructed the Petitioner to provide proof of mailing to the Respondent and to include an affidavit from the individual who mailed the motion. The Petitioner complied with this directive. On November 8, 2023, immediately after the hearing, Oscar Ojok, the individual who mailed the documents on behalf of the Petitioner, sent the Respondent a copy of an affidavit by email. He also mailed a hard copy to the Respondent's provided P.O. box address. Despite these efforts, the Respondent has maliciously failed to acknowledge receipt of this mail, which fulfills the court's requirements, and this was done before the Order was sent to the judge for signature.

The Respondent, however, drafted the order to include an additional requirement for login information to an E-posta account with Posta Uganda. This addition was unreasonable and unattainable for several reasons:

1. **Petitioner Is Not a Resident of Uganda:** The Petitioner is not a resident of Uganda and does not possess an online account with Posta Uganda. The Petitioner used Posta Uganda only for the second time in nearly four years, having last used it in 2019. It is therefore unreasonable to expect the Petitioner to provide login information for an account she does not possess.
2. **Affidavit Provided as Per Court Instruction:** The judge's initial requirement was for the Petitioner to provide proof of delivery to the Respondent, accompanied by an affidavit from the person who mailed the motion. This requirement was met when Oscar Ojok sent the affidavit to the Respondent. The Respondent's insistence on requiring login information from an E-posta account was an unnecessary complication added after the judge's initial instructions.
3. **Privacy Concerns and Lack of Relevance:** Even if the Petitioner had an online account with Posta Uganda, providing login information would be a breach of privacy and is not an acceptable or standard practice. Additionally, the post office in Uganda has confirmed that any newly created account would only show orders from the time of account creation, not past mailings. Therefore, the request for login information was not only intrusive but also irrelevant to the proof of service in this case.
4. **Repeated Attempts to Serve Respondent:** The Petitioner made multiple attempts to serve the Respondent:
 - **First Attempt:** On June 1, 2023, the Petitioner mailed the motion, which was returned to Uganda because it required a signature upon delivery, and the Respondent was not available to sign for it. This mail was later resent by Posta Uganda using the same tracking number, but the timeline was reset to the date of resending.
 - **Second Attempt:** Despite resending the mail, the Respondent never admitted to receiving it.

- **Third Attempt:** On November 10, 2023, the affidavit from Oscar Ojok was sent to the Respondent email and Mail from Uganda, fulfilling the court's requirements. Yet, the Respondent again refused to acknowledge receipt of this mail.
5. **Respondent's Willful Obstruction:** The Respondent could have easily verified the information provided by the Petitioner by contacting Posta Uganda directly to confirm whether the documents were indeed mailed and whether the tracking information was authentic. However, instead of taking this straightforward and reasonable step, the Respondent was unhinged in their determination to find the Petitioner in default at all costs. This behavior is not only obstructive but also indicative of a strategy to avoid addressing the substantive issues in this case.

The Respondent's refusal to acknowledge receipt of any of these attempts, despite the Petitioner's diligent efforts, suggests a pattern of malicious obstruction designed to frustrate the Petitioner's compliance with the court's orders. The Petitioner has provided every reasonable proof of service as required, and the Respondent's continued denials should not be used as a basis to dismiss the Petitioner's case or to penalize her further.

C. PETITIONER HAS DEMONSTRATED GOOD CAUSE FOR ANY DELAYED RESPONSE

Under **Rule 55(a)** of the South Carolina Rules of Civil Procedure, an entry of default is appropriate when a party fails to respond to a complaint. However, **Rule 55(c)** provides the opportunity for a party to move to set aside the entry of default upon showing "good cause." The South Carolina Supreme Court in **Sundown Operating Co. v. Intedge Indus., Inc.**, 383 S.C. 601, 607, 681 S.E.2d 885, 888 (2009), reaffirmed that "good cause" is a flexible standard, evaluated based on the unique circumstances of each case.

In determining whether good cause exists, courts typically consider the party's responsibility for the default and whether the party acted with reasonable promptness upon discovering the default. As highlighted in **Payne ex rel. Estate of Calzada**, 439 F.3d 198, 204-05 (4th Cir. 2006), the

concept of "reasonable promptness" is assessed in light of the specific facts and circumstances, with considerable deference given to the trial judge's discretion.

In the present case, any delay in the Petitioner's response was caused by extraordinary and compelling personal circumstances. Specifically, the Petitioner had to urgently travel to Uganda following the tragic death of a close friend. Despite these overwhelming personal challenges, the Petitioner made every effort to fulfill her legal obligations, including attempting to serve the necessary documents from abroad.

Upon her return to the United States, the Petitioner took prompt and proactive steps to address any potential delays by resending the documents and ensuring that all procedural requirements were met. This demonstrates the Petitioner's genuine commitment to resolving the matter on its merits, rather than allowing the case to be determined based on procedural technicalities.

The Fourth Circuit has consistently emphasized the importance of deciding cases on their merits, even in the presence of procedural defaults, where a reasonable explanation for the delay exists. For example, in **United States v. Moradi**, 673 F.2d 725, 727 (4th Cir. 1982), the court underscored the need to consider the specific circumstances of each case, with the overarching goal of ensuring fairness and justice.

In light of these considerations, the Petitioner's circumstances clearly satisfy the threshold for "good cause" under Rule 55(c). The delay in the Petitioner's response was not due to negligence or intentional disregard of court procedures, but rather due to significant personal hardship. The prompt corrective actions taken by the Petitioner further highlight her intention to resolve the case on its merits. Accordingly, the entry of default should be set aside, allowing the Petitioner the opportunity to present her defense in this matter.

D. THE ISSUES ARE PROPERLY BEFORE THE COURT

Petitioner strongly contends that the issues raised in the Petition are indeed appropriate for review by the Supreme Court. These issues encompass significant procedural and constitutional concerns that have arisen due to the handling of this case, particularly relating to the unequal treatment of pro se litigants under the current procedural rules in South Carolina. These matters

are crucial and fall within the jurisdiction of the Supreme Court to ensure the fair administration of justice.

During the hearing held on October 31, 2023, Petitioner presented her case, emphasizing that her travel to Uganda, necessitated by a personal tragedy, significantly impacted her ability to meet procedural deadlines. Petitioner provided proof of mailing through affidavits and tracking documents, as directed by the court. The judge acknowledged that the Petitioner had faced difficulties due to the circumstances surrounding the use of the postal system in Uganda, and allowed Petitioner an opportunity to prove the authenticity of her claims. Specifically, the court stated that Petitioner would not be held in default if she could demonstrate that she mailed the required documents as she alleged on June 1, 2023.

Despite complying with this directive by submitting an affidavit from Oscar Ojok, who mailed the documents on her behalf, and resubmitting proof on November 8, 2023, the Petitioner was still found to be in default. This decision disregards the substantial evidence provided by the Petitioner and fails to account for the extraordinary circumstances that contributed to the delay. Furthermore, Petitioner pointed out that Respondent could easily verify the information provided by contacting Posta Uganda but chose instead to focus on securing a default judgment at any cost, demonstrating a malicious intent to undermine Petitioner's efforts.

If the Petitioner had not been restricted to the draconian method of physical mailing, she would have been able to file the motion from Uganda using the online AIS platform, just like those represented by attorneys. She could have paid for the filing online using a debit card, thus avoiding the costly and burdensome process she was forced to undertake. To mail the documents on June 1, 2023, Petitioner's personal assistant had to travel over 300 kilometers from Lira District to Kampala. The trip incurred accommodation costs and fuel expenses exceeding \$500, and the international mail cost alone was more than \$160 to send the package to both the court and the Respondents. Additionally, the post office rejected the cash intended to cover court fees, as pro se litigants are required to pay by cash, further complicating the filing process.

Moreover, the Supreme Court of South Carolina, under Rule 242(a), SCACR, holds the authority to issue a writ of certiorari to review any final decision of the Court of Appeals. The procedural errors highlighted by the Petitioner—such as the refusal to acknowledge legitimate proof of service and the disproportionate burden placed on a pro se litigant—warrant this Court's

intervention to ensure that justice is served. The Respondent's argument that these issues were not preserved for appellate review is unfounded, as the Petitioner has consistently raised these concerns throughout the legal proceedings, both at the trial court and in her motion for reconsideration.

**E. THE SIGNIFICANCE OF PETITIONER'S EXTRAORDINARY
CIRCUMSTANCES JUSTIFIED RELIEF FROM DEFAULT**

The Petitioner's travel to Uganda under such distressing circumstances is more than sufficient to relieve her from the default judgment. Courts have traditionally recognized that unforeseen and significant personal events can justify delays or difficulties in meeting procedural deadlines. The loss of a close friend, particularly under tragic circumstances, is a valid and compelling reason for any temporary delay or difficulty in executing legal procedures, including service of documents.

South Carolina policy strongly favors resolving cases on their merits rather than on procedural technicalities. In **Micronics, Inc. v. S.C. Dep't of Revenue**, 345 S.C. 506, 511, 548 S.E.2d 223, 226 (Ct. App. 2001), the court emphasized this preference, which is further supported by **SCRCP 55(c)**, allowing courts to set aside an entry of default "for good cause." Importantly, Rule 55(c) is to be "liberally construed to promote justice," as highlighted in **Melton v. Olenik**, 379 S.C. 45, 47, 664 S.E.2d 487, 488 (Ct. App. 2008).

The discretion granted to trial judges under Rule 55(c) makes it clear that a party requesting a default judgment is not entitled to one as of right, even when the defendant is technically in default. As stated in **Ricks v. Weinrauch**, 293 S.C. 372, 374-75, 360 S.E.2d 535, 536 (Ct. App. 1987), the court must consider the explanation provided for the default and whether vacating the default serves the interests of justice. Once a satisfactory explanation is offered, the court must also weigh factors such as (1) the timing of the motion for relief, (2) whether the defendant has a meritorious defense, and (3) the degree of prejudice to the plaintiff if relief is granted, as outlined in **Wham v. Shearson Lehman Bros., Inc.**, 298 S.C. 462, 465, 381 S.E.2d 499, 501-02 (Ct. App. 1989).

South Carolina courts have consistently emphasized that Rule 55(c) should be liberally construed to promote justice and to dispose of cases on their merits rather than on technicalities, as reaffirmed in **Bage v. Southeastern Roofing Co. of Spartanburg, Inc.**, 373 S.C. 457, 471, 646 S.E.2d 153, 160 (Ct. App. 2007). This liberal construction is particularly vital in cases involving pro se litigants, who may already be at a disadvantage due to their lack of legal representation.

Furthermore, it is important to note that the Petitioner is not subject to the more rigorous "excusable neglect" standard under **SCRCP Rule 60(b)**, as default judgment has not yet been entered. The standard for setting aside an entry of default under Rule 55(c) is more lenient, as clarified in **Lolatchy v. Arthur Murry, Inc.**, 816 F.2d 951, 953 (4th Cir. 1987). South Carolina courts have repeatedly reaffirmed that the standard under Rule 60(b) is far more stringent than under Rule 55(c), as illustrated in **Sundown Operating Co. v. Intedge Indus., Inc.**, 383 S.C. 601, 607, 681 S.E.2d 885, 888 (2009).

In this case, the Petitioner, who is representing herself pro se, has already faced significant challenges navigating a judicial system that often imposes additional burdens on unrepresented litigants. Her situation is exacerbated by the procedural inequities that disproportionately affect pro se litigants. The fact that she had to deal with a profound personal tragedy while simultaneously managing her legal obligations without the benefit of legal counsel underscores the extraordinary nature of her circumstances.

Given these legal standards, the Petitioner's actions, especially in light of her extraordinary personal circumstances, provide ample justification for setting aside the entry of default. The courts must consider these factors when assessing the validity of the default judgment, particularly in light of the discriminatory impact that existing procedural rules may have on pro se litigants. The strong policy favoring decisions on the merits supports allowing this case to proceed and ensuring that justice is fully served.

**F. PETITIONER'S APPEAL OF DEFAULT JUDGMENT AND DENIAL OF
MOTION TO SET ASIDE DEFAULT JUDGMENT IS PROPERLY BEFORE THE
COURT**

Respondent argues that the Petition should be dismissed on the grounds that Petitioner's appeal is premature, asserting that the appeal is based solely on the January 16, 2024, order denying the motion to set aside the entry of default. Respondent further contends that such an order is not immediately appealable under South Carolina law, citing *Thynes v. Lloyd*, 294 S.C. 152, 153, 363 S.E.2d 122, 122 (Ct. App. 1987), where the court held that an order refusing to grant relief from the entry of default is not appealable until after a final judgment.

However, this argument misconstrues the nature of Petitioner's appeal. Petitioner Dorothy Pierce is appealing from the following orders:

1. Order of Default (January 16, 2024): This order confirmed that Petitioner Dorothy Pierce is in default in her individual capacity. The court explicitly noted that the 45-day deadline from the previous Form 4 order had passed, thereby placing Petitioner in default status.
2. Order Denying Motion to Set Aside Default (February 6, 2024): This order denied Petitioner's motion to reconsider the court's earlier decision to place her in default without the necessity of a hearing.
3. Order Denying Motion to Dismiss and Denying Motion to Set Aside Default (December 5, 2023): This order denied Petitioner's motion to dismiss and denied the motion to set aside the entry of default, giving Petitioner another opportunity to submit proof of the June 1 mailing by December 21, 2023. The order also deferred the default judgment issue until a final ruling on Petitioner's motion to set aside the entry of default was made.

The Petitioner is not only appealing the denial of the motion to set aside the default judgment but is also challenging the underlying default judgment itself, which is a final judgment. In South Carolina, a default judgment conclusively determines the rights and liabilities of the parties and is subject to appeal as a final judgment. The appeal of the order denying the motion to set aside the default judgment is therefore properly before this Court because it is inextricably linked to the finality of the default judgment itself.

Under South Carolina law, once a default judgment has been entered, the defendant has the right to appeal both the default judgment and any subsequent orders, such as the denial of a motion to set aside that judgment. This is because such orders are considered part of the final adjudication of the parties' rights and liabilities. The South Carolina Court of Appeals has recognized that the

appealability of an order denying a motion to set aside a default judgment is contingent upon the appeal of the final judgment itself. In this case, the Order of Default (January 16, 2024), combined with the Order Denying Motion to Set Aside Default (February 6, 2024) and the Order Denying Motion to Dismiss and Denying Motion to Set Aside Default (December 5, 2023), constitutes a final decision, fully resolving the issues between the parties.

Therefore, Respondent's assertion that the Petition is premature is unfounded. The Petitioner's appeal of the Order of Default (January 16, 2024), the Order Denying Motion to Set Aside Default (February 6, 2024), and the Order Denying Motion to Dismiss and Denying Motion to Set Aside Default (December 5, 2023) is properly before this Court. The Court has the jurisdiction and authority to review these matters, as they constitute a final judgment that directly impacts the Petitioner's rights. Consequently, the Petition should not be dismissed on the grounds of prematurity, and the issues raised by the Petitioner should be considered on their merits.

G. RESPONDENT'S MOTION TO DISMISS LACKS MERIT

The Respondent's motion to dismiss represents yet another attempt to sidestep a fair and just resolution of the case by fixating on procedural technicalities. Instead of engaging with the substantive issues at hand—such as the validity of the default judgment and the broader constitutional implications of denying pro se litigants access to equitable treatment under the law—the Respondent seeks to distract the court by focusing on procedural minutiae.

The core issue here is not whether every procedural requirement was met with absolute perfection but whether the fundamental principles of justice are being upheld. The South Carolina Supreme Court has the inherent authority, under Article V, Section 5 of the South Carolina Constitution, to oversee all lower courts and ensure the proper administration of justice. This authority empowers the Court to address significant concerns that go beyond mere procedural irregularities, especially when those concerns implicate the fairness and integrity of the judicial process.

The Petition raises crucial issues related to the constitutional rights of pro se litigants and the potential discriminatory effects of South Carolina's procedural rules. The Respondent's motion to dismiss, by focusing solely on technicalities, seeks to obfuscate these larger, more substantive

concerns. The South Carolina Supreme Court has a responsibility to consider the broader implications of the case, particularly where the administration of justice and the protection of constitutional rights are at stake.

Dismissing the petition on procedural grounds would not only ignore the significant constitutional issues raised but also perpetuate a system that may unfairly disadvantage pro se litigants. The Court's role is to ensure that justice is not only done but seen to be done, particularly in cases where the procedural rules may inadvertently create inequities. The Respondent's motion to dismiss should therefore be denied, allowing the Court to address the substantive issues at the heart of the Petition and to ensure that justice is served.

H. THE PETITION IS NOT FRIVOLOUS AND DOES NOT CONSTITUTE AN ATTEMPT TO DELAY

Petitioner strongly opposes Respondent's assertion that the Petition is frivolous or an attempt to delay the proceedings. This argument mischaracterizes the legitimate and serious nature of the issues raised in the Petition, which seek to address significant procedural and constitutional concerns that have arisen throughout this case.

1. **Petition Raises Substantive Legal Issues:** Contrary to Respondent's claims, the Petition is far from frivolous. It presents substantial legal questions regarding the procedural fairness and constitutional rights of pro se litigants within the South Carolina judicial system. These issues are not only relevant but also critical to ensuring that justice is administered equitably. Petitioner is challenging procedural errors and the discriminatory impact of certain rules on unrepresented parties, which are legitimate grounds for review by this Court.
2. **The Petition is Not an Attempt to Delay:** The assertion that the Petition is an attempt to delay the proceedings is unfounded. Petitioner has consistently sought to resolve this matter on its merits, despite facing numerous obstacles and challenges. The delays in this case have largely stemmed from the extraordinary circumstances that Petitioner encountered, including the sudden and tragic loss of a close friend, which necessitated urgent travel and temporarily impeded her ability to manage her legal affairs. These

delays were not a tactic to evade responsibility but rather a consequence of unforeseen personal hardships.

3. **Petitioner's Conduct Has Been in Good Faith:** Throughout this litigation, Petitioner has acted in good faith, making every effort to comply with court procedures and meet her legal obligations. The repeated filings and motions by Petitioner are not indicative of an intent to delay but reflect her sincere attempts to seek a fair resolution in a complex legal matter where she is at a distinct disadvantage as a pro se litigant. Petitioner's actions demonstrate a commitment to ensuring that her case is heard on the merits, rather than being dismissed on procedural technicalities.
4. **Respondent's Refusal to Settle:** On January 24, 2024, Petitioner extended an olive branch to the Respondent to settle this case amicably and avoid further litigation. However, Respondent declined this offer and chose instead to wait for the Court's decision. This clearly shows that it is Respondent, not Petitioner, who has opted to prolong this matter rather than resolve it promptly. Petitioner's intent has always been to resolve the matter and move on, contrary to Respondent's claims.
5. **The Timing and Substance of the Petition:** The timing of the Petition is directly related to the January 16, 2024, order, which significantly impacts Petitioner's legal rights. The issues raised in the Petition have not been adequately addressed by the lower courts, and it is both appropriate and necessary for the Supreme Court to review these matters to ensure the fair administration of justice. The claim that the issues are "brand new" and not raised before is inaccurate; the Petition builds upon arguments consistently raised by Petitioner throughout the course of this litigation.
6. **Respondent's Request for Sanctions is Unwarranted:** Respondent's request for sanctions under Rule 269, SCACR, is entirely unwarranted. Petitioner's actions do not meet the criteria for sanctions, as there is no evidence of bad faith or intentional misconduct. The Petition was filed with a legitimate basis, seeking to address serious legal and constitutional concerns. The imposition of sanctions in this context would be punitive and unjust, particularly given the substantive issues at stake.

**I. PETITIONER IS NOT PERSONALLY LIABLE FOR ACTIONS CONDUCTED
ON BEHALF OF THE LIMITED LIABILITY COMPANY**

The Respondent's attempt to hold Petitioner Dorothy Pierce personally liable for actions conducted on behalf of American Pharma Machinery, LLC, a limited liability company, is fundamentally flawed and unsupported by South Carolina law.

1. **Limited Liability Company Structure Protects Members from Personal Liability:** South Carolina law is clear in protecting members of a limited liability company (LLC) from personal liability for the debts, obligations, and liabilities of the LLC. Under S.C. Code Ann. § 33-44-303(a), the debts, obligations, and liabilities of an LLC, whether arising in contract, tort, or otherwise, are solely the responsibility of the LLC itself. A member or manager of the LLC is not personally liable for the debts, obligations, or liabilities of the company solely by reason of acting in their capacity as a member or manager. In this case, Petitioner Dorothy Pierce acted solely on behalf of American Pharma Machinery, LLC in her capacity as a member or manager of the LLC. All actions taken by the Petitioner were in furtherance of the company's business, and as such, she cannot be held personally liable for any alleged wrongdoing attributed to the company.
2. **No Grounds for Piercing the Corporate Veil:** Respondent has not provided any evidence that would justify piercing the corporate veil—a legal doctrine that allows for holding LLC members personally liable under very limited and specific circumstances, such as fraud, bad faith, or when the LLC is merely an alter ego of its members. In South Carolina, courts will only pierce the corporate veil in exceptional cases where it is clear that the LLC structure is being abused to perpetrate a fraud or other unjust act. In this case, there is no evidence or allegation that Petitioner engaged in any conduct that would meet the high threshold required to pierce the corporate veil.
3. **Petitioner's Actions Were Conducted in Good Faith:** The Petitioner has acted in good faith and within the bounds of her role as a member of the LLC. There is no evidence that she engaged in any fraudulent or wrongful conduct that would warrant holding her

personally liable. The Respondent's attempt to hold the Petitioner personally liable is not only contrary to South Carolina law but also an unfounded and unsupported assertion.

PRAYER FOR RELIEF

WHEREFORE, Petitioner Dorothy Pierce respectfully prays that this Honorable Court grant the following relief:

1. **Deny Respondent's Motion to Dismiss and Relief Sought:** Petitioner requests that the Court deny Respondent's Motion to Dismiss her Petition for a Writ of Certiorari and Request for sanctions.
2. **Set Aside Default Judgment:** Petitioner requests that the Court set aside the default judgment entered against her, recognizing the good cause presented by her extraordinary circumstances and the violations of her constitutional rights.
3. **Reconsideration of Denied Motions:** Petitioner requests that the Court reconsider and reverse the orders denying her motions to set aside the default and dismiss the case, acknowledging the procedural errors and injustices that have occurred.
4. **Grant Petitioner an Opportunity to Present Her Case:** Petitioner requests that the Court remand the case for a full hearing on the merits, allowing her to present her defenses and arguments in a fair and just manner.
5. **Grant Pro Se Litigants Access to Online Filing:** Petitioner requests that the Court grant pro se litigants the same access to online filing systems as litigants represented by attorneys, thereby ensuring equal access to justice and alleviating the significant burdens placed on unrepresented parties.
6. **Grant Any Other Relief:** Petitioner requests that the Court grant any other relief it deems just and proper to ensure the fair administration of justice and the protection of Petitioner's constitutional rights.

Respectfully submitted, this August 28, 2024



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