

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM OCONEE COUNTY
Court of Common Pleas

S.C. SUPREME COURT

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232

PlanetONE Packaging, LLC,Respondent,

v.

American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo Defendants,

OF WHOM Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo is the Petitioner.

RESPONDENT’S MOTION FOR AN EXTENSION OF TIME TO FILE REPLY BRIEF

Pursuant to Rules 240 and 263, SCACR, the Respondent PlanetONE Packaging, LLC (“PlanetONE” or “Respondent”) respectfully moves for an extension of ten (10) days to file Respondent’s Reply Brief to Petitioner Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Pierce” or “Petitioner”) Return to Respondent’s Motion to Dismiss Petition for a Writ of Certiorari. The current deadline to file Respondent’s Reply Brief is Tuesday, September 3, 2024.

If the Court should grant the Respondent’s request for an extension of time to file the Reply Brief, the new deadline for the applicable filing would be Friday, September 13, 2024. This requested extension is not intended to hinder, delay, or prejudice the judicial proceeding, but is

requested due to intervening travel obligations and other circumstances outside of the control of Respondent making such an extension necessary to properly prepare the Reply Brief. Undersigned counsel has consulted with Petitioner, *pro se*, and has not obtained an objection or consent to this motion from her.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Christopher B. Major

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

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September 3, 2024