

**RECEIVED**

**Oct 10 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232  
Appellate Case No. 2024-000334

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 .....Appellant.

**MOTION FOR COSTS**

Pursuant to Rule 222, SCACR, Respondent PlanetONE Packaging, LLC (“PlanetONE” or “Respondent”) hereby moves this Court to award its recoverable costs and attorneys’ fees. The above-captioned appeal was dismissed by the Court of Appeals and certiorari was denied by the Supreme Court. A sworn, itemized statement of Respondent’s costs and fees incurred is attached hereto.

*Signature page follows*

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)  
ONE North Main Street, 2<sup>nd</sup> Floor  
P.O. Box 2048 (29602)  
Greenville, SC 29601  
(864) 240-3200  
[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)  
[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

*Attorneys for Respondent PlanetONE  
Packaging, LLC*

October 10, 2024  
Greenville, South Carolina

RECEIVED

Oct 10 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232  
Appellate Case No. 2024-000334

PlanetONE Packaging, LLC, .....Respondent,

v.

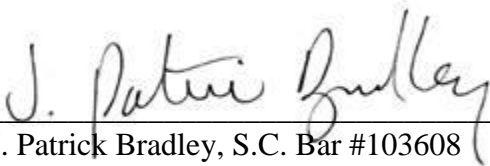
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo ..... Defendants,

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

**PROOF OF SERVICE**

I, the undersigned counsel for Respondent, do hereby certify that I have on October 10, 2024, caused *Respondent's Motion for Costs* to be served via U.S. Mail, on the opposing party of record, who is proceeding pro se in this matter, at the address shown below:

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678

  
\_\_\_\_\_  
J. Patrick Bradley, S.C. Bar #103608  
Haynsworth Sinkler Boyd, P.A.  
P.O. Box 2048  
Greenville, SC 29602  
864.240.3200  
[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

**HAYNSWORTH  
SINKLER BOYD**

**RECEIVED**

**Oct 10 2024**

**SC Court of Appeals**

HAYNSWORTH SINKLER BOYD, P.A.  
ONE NORTH MAIN STREET, 2<sup>ND</sup> FLOOR  
P.O. BOX 2048 (29602)  
GREENVILLE, SOUTH CAROLINA 29601  
MAIN 864.240.3200  
FAX 864.240.3300  
www.hsblawfirm.com

**J. PATRICK BRADLEY**  
DIRECT 864.240.4567  
pbradley@hsblawfirm.com

October 10, 2024

**VIA FIRST CLASS MAIL**

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678

RE: PlanetONE Packaging, LLC v. Dorothy Pierce, et. al.  
Appellate Case No. 2024-001156

Ms. Pierce:

Please find enclosed for service upon you Respondent PlanetONE Packaging, LLC's Motion for Costs, together with a Proof of Service for same, with regard to the above-referenced matter. This was filed with the South Carolina Court of Appeals today.

Please do not hesitate to contact me if you have any questions.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



J. Patrick Bradley

Enclosures