

From: [Loomis, Kenan](#)
To: [Dorothy Pierce](#)
Cc: [Court Of Appeals Filings](#); [Kinney, Charles A.](#); [White, Christina](#); [Bowman, Chad R.](#); [Chris Smith](#); [Mishkin, Maxwell S.](#); [Cooper, Kimberly](#); [Shawn Bingham](#)
Subject: RE: Lack of Proper service of Respondent's Initial Brief -Court of Appeals Case No. 2024-000739
Date: Monday, March 17, 2025 4:22:30 PM
Attachments: [Proof of Mailing Initial Appeals Brief to Pierce 3.7.2025.pdf](#)

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms. Pierce is incorrect. Attached is the Proof of Service of the Appellee's Initial Brief and Designation via U.S mail, in accordance with Rule 262(c)(1)-(2), SCACR (defining service as hand-delivery or depositing a copy in the U.S. mail).



Kenan Loomis
Member | Cozen O'Connor
The Promenade, 1230 Peachtree Street NE Suite 400 | Atlanta, GA 30309
P: 404-572-2028 F: 866-591-9127 C: 404-281-9916
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RECEIVED

Mar 18 2025

SC Court of Appeals

From: Dorothy Pierce <dorothypierce84@gmail.com>
Sent: Monday, March 17, 2025 4:14 PM
To: Loomis, Kenan <kloomis@cozen.com>
Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Kinney, Charles A. <CAKinney@cozen.com>; White, Christina <CWhite@cozen.com>; Bowman, Chad R. <BowmanChad@ballardspahr.com>; Chris Smith <csmith@clarksonwalsh.com>; Mishkin, Maxwell S. <MishkinM@ballardspahr.com>; Cooper, Kimberly <KCooper@cozen.com>; Shawn Bingham <sbingham@fmglaw.com>
Subject: Re: Lack of Proper service of Respondent's Initial Brief -Court of Appeals Case No. 2024-000739

****EXTERNAL SENDER****

Mr. Loomis should refer to the August 28, 2024 order issued by the South Carolina Court of Appeals, in which the Court specifically warned Respondent against utilizing any form of service other than those prescribed by the applicable rules including service by email upon a pro se Appellant.

The Court's order stated:

"We take this opportunity to remind counsel for Respondents that Rule 262(c), SCACR, permits service by electronic means only in a manner provided by Supreme Court order. Pursuant to the Supreme Court's order Re: Methods of Electronic Filing and Service Under Rule 262, SCACR dated April 24, 2024, service by email is only permitted by a lawyer admitted to practice law in South Carolina upon another lawyer admitted to practice law in South Carolina using the lawyer's primary email address. Service upon self-represented litigants shall be made as set forth by Rule 262(c)(1)-(2), SCACR (defining service as hand-delivery or depositing a copy in the U.S. mail).

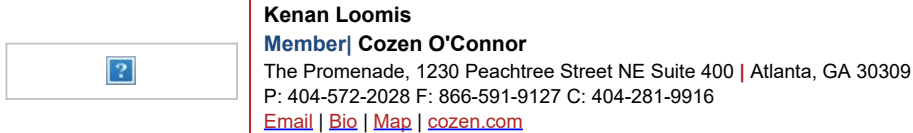
Despite this clear directive, Mr. Loomis has disregarded the Court's instructions. Not only has Mr. Loomis failed to comply with the proper method of service, but he has also failed to address the **misrepresentation** concerning the alleged mailing of the Initial Brief. Instead, Mr. Loomis has now shifted his position to claim that the document was **emailed**, which directly contradicts the Court's explicit directive in the **August 28, 2024** order. [Copy is attached herein]

Thank you,

Dorothy Pierce, Appellant

On Mon, Mar 17, 2025 at 10:46 PM Loomis, Kenan <kloomis@cozen.com> wrote:

Here is the email demonstrating Appellant was served the Initial Brief on March 7, 2025.



From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Monday, March 17, 2025 3:40 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Loomis, Kenan <kloomis@cozen.com>; White, Christina <CWhite@cozen.com>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto: BowmanChad@ballardspahr.com)>; Chris Smith <csmith@clarksonwalsh.com>; Mishkin, Maxwell S. <MishkinM@ballardspahr.com>; Cooper, Kimberly <KCooper@cozen.com>; Shawn Bingham <sbingham@fmglaw.com>

Subject: Re: Lack of Proper service of Respondent's Initial Brief -Court of Appeals Case No. 2024-000739

****EXTERNAL SENDER****

Dear Clerk,

Counsel for Respondent, **Mr. Loomis**, is incorrect, and his assertion that they mailed the **Initial Brief of Respondent** via **Tracking No.: 286390107873** is **fraudulent**.

On **March 14, 2025**, Appellant received via **FedEx Priority Mail** what was specifically the **Respondent's Opposition to Appellant's Motion for Continuance** in a lower court case under case number **2022-CP-3700108** — **not** the Initial Brief as claimed by the Respondent.

In this opposition, the Respondent sought to block the Appellant's previously approved travel plans to Africa. However, these travel plans had already been authorized by **Judge McIntosh** following the Appellant's submission of substantial evidence **through an in-camera review**, which demonstrated that her family member had been abducted on **February 25, 2025**, and that the children were in **critical danger**.

The Respondent's tracking number for the FedEx delivery was created on **March 13, 2025**, and the document was delivered by **next-day mail** on **March 14, 2025**. [See the attached Tracking History]

Furthermore, the Respondent claimed to have filed their **Initial Brief** with the court on **March 7, 2025**, and submitted a **certificate of service** asserting that they had served the Appellant on that same day. However, in reality, the Respondent **never mailed the Initial Brief** on March 7, 2025. The Respondent now asserts that they mailed the Initial Brief on **March 13, 2025**, claiming it was delivered on **March 14, 2025**.

The only document delivered via **overnight service** on **March 14, 2025**, was the **Respondent's**

Motion for Continuance — **not** the Initial Brief. It appears that the Respondent rushed to send this document in an attempt to block the Appellant's scheduled travel plans for **March 15, 2025**, and to force her to attend their deposition scheduled for **March 17, 2025**, despite the Appellant's **extenuating circumstances** and the **life-threatening situation** involving her children and the caregiver responsible for the Appellant's children in Africa.

Despite knowing this, the Respondent knowingly misrepresented that the document delivered on **March 14, 2025** was their Initial Brief.

The Appellant departed for Africa on **March 15, 2025**, yet as of today, the Initial Brief has still **not been delivered**, as confirmed by documents collected from the mailbox on behalf of Appellant today.

Given the Respondent's failure to properly serve the Initial Brief as required, the Appellant respectfully requests that the **Respondent's Initial Brief be stricken from the record for lack of proper service**.

Thank you for your time and attention to this matter.

Sincerely,

On Mon, Mar 17, 2025 at 9:42 PM Court Of Appeals Filings <ctappfilings@sccourts.org> wrote:

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Loomis, Kenan <klloomis@cozen.com>

Sent: Monday, March 17, 2025 2:29 PM

To: Dorothy Pierce <dorothypierce84@gmail.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>; White, Christina <CWhite@cozen.com>; Bowman, Chad R. <BowmanChad@ballardspahr.com>; Chris Smith <csmith@clarksonwalsh.com>; Mishkin, Maxwell S. <MishkinM@ballardspahr.com>; Cooper, Kimberly <KCooper@cozen.com>; Shawn Bingham <sbingham@fmgllaw.com>

Subject: RE: Lack of Proper service of Respondent's Initial Brief -Court of Appeals Case No. 2024-000739

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

To the contrary, it was delivered at 10:24 on Friday, March 14

[Your shipment was delivered 286390107873](#)

Kenan Loomis

Member | Cozen O'Connor

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P: 404-572-2028 F: 866-591-9127 C: 404-281-9916

[Email](#) | [Bio](#) | [Map](#) | cozen.com

From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Monday, March 17, 2025 2:11 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; White, Christina <CWhite@cozen.com>; Bowman, Chad R. <BowmanChad@ballardspahr.com>; Chris Smith <csmith@clarksonwalsh.com>; Loomis, Kenan <kloomis@cozen.com>; Mishkin, Maxwell S. <MishkinM@ballardspahr.com>; Cooper, Kimberly <KCooper@cozen.com>; Shawn Bingham <sbingham@fmglaw.com>

Subject: Lack of Proper service of Respondent's Initial Brief -Court of Appeals Case No. 2024-000739

****EXTERNAL SENDER****

Clerk,

As of Saturday March 15, 2025, appellant had not yet received a proper service of Respondent's Initial Brief in this matter.

DOROTHY PIERCE-Appellant
Justice is not a Privilege but a Fundamental Human Right.
"TRUTH is TREASON in an EMPIRE of LIES"

750 Mourning Dove Lane, Seneca, SC.29678
Tel: 864-324-3247

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**DOROTHY PIERCE**  
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**DOROTHY PIERCE**

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