

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

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, Respondent McDuff; MJM Law, LLC; Riley Morningstar; The Journal Newspaper; Hal Welch... Respondents.

**MOTION FOR EXTENSION OF DEADLINE TO FILE REPLY TO RESPONDENT'S RETURN TO APPELLANT'S MOTION TO STRIKE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

COMES NOW, the Appellant Dorothy Pierce, pro se, and respectfully moves this Honorable Court for an extension of time to file Appellant's Reply to Respondent's Return to Appellant's Motion to Strike Respondent's Initial Brief and Designation of Matter. In support of this motion, Appellant states as follows:

**BACKGROUND**

1. On March 19 2025, Respondent notified Appellant that they had filed a Return to Appellant's Motion to Strike Respondent's Initial Brief and Designation of Matter.
2. Despite this notification, Appellant has not yet received a copy of the filing. The only material provided by Respondent was an image of an envelope, allegedly containing the Return.
3. As of the date of this filing, Appellant has still not been served with a complete and official copy of the Respondent's Return.

**GROUND FOR EXTENSION**

4. On March 15, 2025, Appellant traveled to Africa to respond to an urgent family emergency involving the kidnapping of Appellant's children's caretaker.

5. Appellant will return to the United States on April 2, 2025.
6. Since arriving in Africa, Appellant has faced severe challenges accessing the South Carolina Court's online portal (SCCOURTS.ORG), which appears to restrict access from certain regions, including Africa.
7. Without access to the online portal and without having received a copy of the Respondent's Return, Appellant is unable to prepare a meaningful and proper reply.
8. These circumstances are beyond Appellant's control and warrant a reasonable extension of time.

### **REQUEST FOR RELIEF**

9. Appellant respectfully requests an extension of 21 days from the date Appellant receives a complete copy of Respondent's Return to file the Reply.
10. Alternatively, set a new deadline of April 15 2025 to allow Appellant adequate time to review Respondent's filing and prepare the Reply.
11. If the Court cannot grant an extension, Appellant respectfully requests that the Court furnish Appellant with a copy of the Response in **PDF format** so that Appellant can prepare a reply. Due to technical difficulties accessing **SCCOURTS.org**, Appellant has been unable to download any filed documents.

Respectfully submitted, March 23, 2025



---

DOROTHY PIERCE

750 Mourning Dove Ln. Seneca, South Carolina 29678

(864) 324-3247

dorothypierce84@gmail.com

FOR THE APPELLANT

# Confirmation

✔ Thank you for your booking **Queen Dorothy Amolo**

An email with all the relevant details about your trip has been sent to **queensworld1984@gmail.com**. We look forward to welcoming you on board soon.

Your booking reference is

**Q9HRVY**

## Your Itinerary

### Atlanta to Nairobi

Saturday, 15 March 2025

✔ Confirmed

**05:50 pm**

ATL

3h 55m FRA

**10:00 pm**

+1 day

NBO

Economy Basic

### Itinerary details

⌵ Total duration: 21h 10m

8h 45m

05:50 pm Atlanta

Hartsfield-Jackson Int (ATL)

Terminal I

07:35 am Frankfurt

(+1 day)

Frankfurt International (FRA)

Terminal 1

LH 445 operated by Lufthansa

AIRBUS A340-300

Economy

1 stop in Frankfurt International 3h 55m

11:30 am Frankfurt

Frankfurt International (FRA)

8h 30m

Terminal 1

10:00 pm Nairobi

Jomo Kenyatta International (NBO)

LH 590 operated by Lufthansa 

AIRBUS A340-300

Economy

## Your fare



### Rebooking

Allowed plus fare difference



### Refundability

Not possible



### Carry-on bags

1 x 8kg (18lb)



### Checked baggage

2 x 23kg (50lb)



### Onboard catering

ATL-FRA: Meal, Refreshment

FRA-NBO: Meal, Refreshment

## Nairobi to Atlanta

✓ Confirmed

Tuesday, 1 April 2025

10:55 pm

NBO

3h 30m FRA

02:20 pm

+1 day

ATL

Economy Basic

## Itinerary details



Total duration: 22h 25m

8h 50m

10:55 pm Nairobi

Jomo Kenyatta International (NBO)


Terminal 1C

06:45 am Frankfurt

(+1 day)


Frankfurt International (FRA)

Terminal 1

LH 591 operated by Lufthansa 

AIRBUS A330-300


Economy

 1 stop in Frankfurt International 3h 30m






10h 5m

10:15 am Frankfurt  
Frankfurt International (FRA)  
Terminal 1

02:20 pm Atlanta  
Hartsfield-Jackson Int (ATL)  
Terminal I

LH 444 operated by Lufthansa   
AIRBUS A330-300  
Economy

## Your fare

-  **Rebooking**  
Allowed plus fare difference
-  **Refundability**  
Not possible
-  **Carry-on bags**  
1 x 8kg (18lb)
-  **Checked baggage**  
2x 23kg (50lb)
-  **Onboard catering**  
NBO-FRA: Refreshment, Meal  
FRA-ATL: Meal, Refreshment

Total price flights: USD **1,021.21**

## Passenger details

Once your passenger details are submitted after check-in, they cannot be modified online. To make changes, please contact the call center.

## Passenger



**Queen Dorothy Amolo**

queensworld1984@gmail.com

+1 8643243247

Adult

Personal Information

Ms. Queen Dorothy Amolo

14/04/1983, Female

Frequent flyer

No frequent flyer information provided

Contact information

Email

queensworld1984@gmail.com

Phones

+1 8643243247

## Extra services



### Baggage

from USD 230.00



#### Atlanta to Nairobi

1 carry-on bag,  
2 checked bags

#### Queen Dorothy Amolo

1 carry-on bag (18lbs 8kg/46in. 118cm max)  
2 checked bags (50lbs 23kg/62in. 158cm max)



#### Nairobi to Atlanta

1 carry-on bag,  
2 checked bags

#### Queen Dorothy Amolo

1 carry-on bag (18lbs 8kg/46in. 118cm max)  
2 checked bags (50lbs 23kg/62in. 158cm max)

Total price: USD **1,021.21**

\* Please note that your selected CO<sub>2</sub> offsetting option cannot be refunded if you cancel or rebook your flight.

- \* We would like to point out that you are not entitled to have the amounts paid for your CO<sub>2</sub> offsetting option passed on to a specific cooperation partner of the Lufthansa Group climate protection portfolio.
- \* Rather, the selection of cooperation partners for climate protection projects is at the discretion of the Lufthansa Group.



**South Carolina  
JUDICIAL BRANCH**

**Access Denied**

**Error 16**

**www.sccourts.org**

**2025-03-23  
23:42:37 UTC**

## What happened?

This request was blocked by our security service

Your IP: [41.210.145.236](#)

Proxy IP: [45.223.128.217](#) (ID 106551-100)

Incident ID: [6551000370140127207-15281837665880390](#)

Powered by **imperva**



**South Carolina**

**JUDICIAL  
BRANCH**

**Access Denied**

**Error 16**

**www.sccourts.org**

**2025-03-22**

**15:14:31 UTC**

### **What happened?**

This request was blocked by our security service

Your IP: [105.21.65.58](#)

Proxy IP: [45.223.128.217](#) (ID 106546-100)

Incident ID: [6546000320161482098-82859926842640397](#)

Powered by **imperva**



quadjient

FIRST-CLASS MAIL  
IMI

\$004.31<sup>0</sup>

03/19/2025 ZIP 28202  
043M31256004

US POSTAGE



301 South College Street  
Suite 2100  
Charlotte, NC 28202

To:

Dorothy Pierce  
750 Mourning Dove Lane,  
Seneca, SC 29678

---

**RE: Motion to Strike Complaint--Clements Electrical Case.**

---

**Loomis, Kenan** <kloomis@cozen.com>

Wed, Mar 19, 2025 at 9:50 PM

To: Dorothy Pierce &lt;dorothypierce84@gmail.com&gt;

Cc: "White, Christina" &lt;CWhite@cozen.com&gt;, Chris Smith &lt;csmith@clarksonwalsh.com&gt;, "Cooper, Kimberly" &lt;KCooper@cozen.com&gt;, "Ingram, Christine" &lt;CIngram@cozen.com&gt;

Ms. Pierce, we today filed Respondent's Response in Opposition to Appellant's Motion to Strike Respondent's Initial Brief and Designation of Matter and for Sanctions. In it, we noted Appellant's Initial Brief's non-compliance with SCACR Rules 208(b)(1), 208 (b)(1)(A), 208 (b)(1)(B), 208 (b)(1)(C), 208 (b)(1)(D), 208 (b)(1)(E), 208(b)(4), 209(b) & 262 (b). These extensive procedural deficiencies provide a basis for dismissing your appeal. See, SCACR 260(a). ("Whenever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk **shall** issue an order of dismissal, which shall have the same force and effect as an order of the appellate court.") (emphasis added); *Henning v. Kaye*, 415 S.E.2d 794 (S.C. 1992).

Recent correspondence indicates you will require strict compliance with Rule 262(c)(1)-(2), SCACR (defining service as hand-delivery or depositing a copy in the U.S. mail) with respect to pro se litigants . Although we have previously provided you copies of pleadings via U.S. Mail, we also did so via email and Fed Ex as a courtesy to insure receipt. Attached you will find the envelope with appropriate postage indicating service upon you via U.S. Mail of Appellees' Response in Opposition to Appellant's Motion to Strike Respondent's Initial Brief and Designation of Matter and for Sanctions.

**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

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

[Quoted text hidden]

---

 **[Untitled].pdf**  
41K

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

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.

---

**PROOF OF SERVICE**

---

I, Dorothy Pierce, hereby certify that on this 23rd day of March 2025, I served the Motion for Extension in the above-captioned appeal upon opposing counsel by U.S. Mail, with proper postage affixed, addressed to the counsel's last known mailing addresses as follows:

Charles A. Kinney  
Kenan G. Loomis (Pro Hac Vice)  
COZEN O'CONNOR  
301 S. College Street Suite 2100, Charlotte, NC 28202  
(704) 348-3471  
[ckinney@cozen.com](mailto:ckinney@cozen.com)/ [kloomis@cozen.com](mailto:kloomis@cozen.com)

W. Shawn Bingham  
FREEMAN MATHIS & GARY  
100 Galleria Parkway, Suite 1600  
Atlanta, GA 30339  
[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)

Chad R. Bowman  
Maxwell S. Mishkin  
BALLARD SPAHR LLP  
1909 K. Street NW, 12th Floor  
Washington, DC 20006  
(202) 661-2200  
bowmanchad@ballardspahr.com  
mishkinm@ballardspahr.com



---

DOROTHY PIERCE  
750 Mourning Dove Ln. Seneca, South Carolina 29678  
(864) 324-3247  
dorothypierce84@gmail.com  
THE APPELLANT