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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The order of The Honorable R. Lawton McIntosh, Circuit Court Judge  
10<sup>th</sup> Circuit Case No. 2024-CP-37-00080

**Appellate Case No. 2024-002189**

Dorothy Pierce, Appellant,

v.

Danny Singleton, Respondent.

**MOTION TO ACCEPT LATE FILING OF INITIAL BRIEF, STATEMENT OF ISSUES  
ON APPEAL, AND DESIGNATION OF MATTER**

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COMES NOW, Appellant Dorothy Pierce, pro se, and respectfully moves this Honorable Court to accept her late filing of the Initial Brief, Statement of Issues on Appeal, and Designation of Matter to Be Included in the Record on Appeal, pursuant to Rule 263, SCACR, and in the interest of justice. In support of this motion, Appellant states as follows:

**GROUND FOR LATE FILING**

1. **Abduction of Family Guardian and Ongoing Security Threats:** On February 25, 2025, Appellant's personal assistant and the primary caretaker of her children in Uganda, Oscar Ojok, was abducted by men in military uniform, later identified as members of the Ugandan Special Forces Command (SFC). He was held for days, released under duress, and has since been abducted again. His targeting has placed Appellant's children and household under immediate threat.
2. **Forced Emergency Relocation and Retaliation Against Appellant's Son:** On February 26, 2025, Appellant was forced to urgently relocate her children to an undisclosed location. That same day, her 18-year-old son, Jethro Judge, was arrested and falsely charged with abducting

his own guardian, Oscar despite having no involvement. He was released only after Oscar's voluntary statement to police cleared him of any wrongdoing. Still, the event left Jethro traumatized and visibly endangered, as he had previously encountered and unknowingly directed the abductors to Oscar's home.

3. **International Evacuation and Single-Parent Obligations:** Due to the persistent threats, Appellant was forced to travel to Uganda on March 15, 2025, to coordinate a safe exit plan for her children. She returned to the United States on April 2, 2025, to care for her two youngest children, aged 6 months and 2.5 years, and to resume full-time work and parenting responsibilities alone.
4. **Continued Emergency Response:** With the crisis still unresolved, Appellant's husband, Dr. Jason Boyle, returned to Uganda on May 16, 2025, to take over efforts to protect and relocate the children. In the meantime, Appellant has been solely responsible for managing family, employment, and legal matters in the U.S., making timely filing of the brief exceptionally difficult.
5. **Good Faith and No Prejudice:** Appellant acted in good faith and has now completed the required documents. Granting this motion will not prejudice the Respondent, and will serve the interests of justice by ensuring this appeal is decided on its merits.

Appellant reserves the right to supplement this designation if necessary.

#### **PRAYER FOR RELIEF**

Appellant respectfully requests that the Court accept the late filing of her Initial Brief, Statement of Issues on Appeal, and Designation of Matter, and grant all other just and proper relief.

Respectfully submitted, this Saturday 21<sup>st</sup> day of June 2025.



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