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Aug 11 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY
PlanetONE Packaging, LLC, Respondent,
V.

American Pharma Machinery, LLC, and Dorothy Piercea/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a QueenDorothy Amolo, Defendants,

Of whom Dorothy Pierce a/k/a Dorothy Wells a/k/aDorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

Case No. 2023-CP-37-00232
Appellate Case No. 2025-00049

REQUEST FOR EXPEDITED CONSIDERATION OF PETITION FOR WRIT OF SUPERSEDEAS

Appellant Dorothy Pierce (“Appellant”), proceeding pro se, respectfully moves this Honorable Court for an expedited hearing on her concurrently filed **Motion for Stay of Execution and Waiver of Supersedeas Bond**. Appellant requests that the Court schedule emergency consideration at the earliest possible date.

This request is necessary because Respondent has already initiated aggressive and dangerous post-judgment collection actions designed to seize property and undo a legitimate transfer of real estate , a transaction completed lawfully and in good faith **before** the judgment was entered , solely to strip Appellant of assets before her appeal can be decided.

GROUND FOR EXPEDITED HEARING

1. On March 24, 2025, the Oconee County Court of Common Pleas entered judgment against Appellant personally in the amount of \$262,130.33. Appellant has filed a meritorious appeal challenging that judgment on multiple grounds, including fundamental due process violations and legal errors.
2. Without awaiting appellate review, Respondent has commenced immediate enforcement. On August 6, 2025, Respondent filed a new fraudulent transfer action against Appellant and a third party (Case No. 2025-LP-37-00107) and recorded a Lis Pendens. This action is aimed not merely at freezing assets, but at **reversing a valid, pre-judgment sale and transfer of**

real property, a move that threatens lawful property rights and creates the risk of irreversible harm.

3. These actions reveal Respondent's intent to execute on the judgment with maximum speed, seizing and liquidating Appellant's property before appellate review can occur. If successful, such actions will destroy the status quo and effectively nullify Appellant's right to meaningful appellate relief.
4. Appellant will suffer **immediate and irreparable harm** if the stay motion is not heard on an emergency basis. Once property is seized, sold, or title is disturbed, it may be impossible to restore possession or undo the transfer even if Appellant prevails on appeal.
5. A prompt stay is necessary to halt these aggressive and potentially unlawful enforcement actions, preserve the status quo, and protect Appellant's fundamental right to the fruits of a meritorious appeal.

RELIEF REQUESTED

WHEREFORE, Appellant respectfully requests that this Court:

1. Schedule an expedited hearing on her Motion for Stay of Execution and Waiver of Supersedeas Bond; and
2. Grant such other and further relief as the Court deems just and proper to prevent irreparable harm pending appeal.

Respectfully submitted this 11th day of August 2025.

S/N Dorothy Pierce

Dorothy Pierce, Pro Se Appellant

750 Mourning Dove Lane

Seneca, SC 29678