

STATE OF SOUTH CAROLINA

COUNTY OF OCONEE

PlanetONE Packaging, LLC,

Plaintiff,

v.

Dorothy Pierce a/k/a Dorothy Wells a/k/a
Dorothy Aleweny a/k/a Queen Dorothy
Amolo, a/k/a Queen Dorothy Amolo Pierce,
and Apparatus LLC,

Defendants.

IN THE COURT OF COMMON PLEAS

2025-LP-37-_____

LIS PENDENS

RECEIVED

Aug 11 2025

SC Court of Appeals

NOTICE IS HEREBY GIVEN that an action has been, or within 20 days will be, instituted in this Court for the execution of that Order of Default Judgment (C.A. No. 2023-CP-37-00232) signed by the Honorable R. Lawton McIntosh and filed with the Oconee County Court of Common Pleas on March 24, 2025 against American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo on the real property located in Oconee County, South Carolina, more fully described on the property description attached hereto as **Exhibit A.**

HAYNSWORTH SINKLER BOYD, P.A.

s/ Christopher B. Major
Christopher B. Major, S.C. Bar #72872
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August 6, 2025
Greenville, South Carolina

EXHIBIT A

Legal Description Of Property: ALL that certain piece, parcel, or lot of land, situate, lying, and being in the State of South Carolina, County of Oconee, being shown and designated as Lot 10, The Woods Subdivision, on Plat dated July 1, 1981, recorded in Plat Book P-45, at Page 88, in the Register of Deeds Office for Oconee County, South Carolina, reference to which is hereby given for a more complete metes and bounds description thereof.

This being a portion of property of Doyle Pierce, conveyed by deed of Dan Rankin Realty, Inc, recorded in Deed Book 1683, Pages 295-296, dated September 23, 2008, in the records of Oconee County, South Carolina.

This is the identical property transferred to the Grantor, Queen Dorothy Amolo Pierce through the estate of Doyle Elton Pierce, deceased by the deed of distribution dated March 10, 2025, and recorded in Deed Book 3191, pages 62-63, in the records of Oconee County, South Carolina.

Said property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 294-295.

Oconee County Tax Map No. 252-00-03-051

ALSO,

Legal Description Of Property: ALL that certain piece, parcel, or lot of land situate, lying, and being in the State of South Carolina, County of Oconee, Seneca Township, Return Community, being known and designated as Lot Number EIGHT (8) of THE WOODS, as shown and more fully described on a Plat thereof by Michael L. Henderson of Cornerstone of Seneca, Inc., dated July 1, 1981, and recorded in Plat Book P-45, Page 88, in the records of Oconee County, South Carolina, reference to which is hereby made for a more complete metes and bounds description thereof.

This is the identical property conveyed to Doyle Pierce by deed of Regina Corn Watson Crukleton, recorded in Deed Book 1793, Pages 309-311, dated September 14, 2010, in the records of Oconee County, South Carolina.

Said Property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 296-297.

Oconee County Tax Map No. 252-00-03-049

ALSO,

Legal Description Of Property: ALL that certain piece, parcel, or lot of land, situate, lying, and being in the State of South Carolina, County of Oconee, being shown and designated as Lot 7, The Woods Subdivision, on Plat dated July 1, 1981, recorded in Plat Book P-45, at Page 88, in the Register of Deeds Office for Oconee County, South Carolina, reference to which is hereby given for a more complete metes and bounds description thereof.

This is the identical property transferred to the Grantor, Queen Dorothy Amolo Pierce through the estate of Doyle Elton Pierce, deceased by the deed of distribution dated March 10, 2025, and Recorded in Deed Book 3191, pages 60-61, in the records of Oconee County, South Carolina.

Said Property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 298-299.

Oconee County Tax Map No. 252-00-03-048

ALSO,

Legal Description: This property was transferred to Queen Dorothy Amolo Pierce through the estate of Doyle Elton Pierce, deceased by the deed of distribution dated March 10, 2025, and recorded in Deed Book 3191, pages 54 - 57, in the records of Oconee County, South Carolina.

TRACT ONE: ALL that certain piece, parcel, or tract of land, situate, lying, and being in Return School District, Oconee County, South Carolina, containing 19 acres, more or less, bounded now or formerly by lands of H. D. Alexander on the North and East, W. B. Gambrell on the East, and Adams on the West, and being more particularly described on a plat prepared by Harry U. Earle, Surveyor, recorded in Plat Book J at Page 194, in the records of Oconee County, South Carolina.

This is the identical property conveyed to DOYLE E. PIERCE by deed from PEGGY JO D. COLE and BOBBY EUGENE DYAR, dated July 16, 1969, and recorded in Deed Book 10-Q at Page 9, in the records of Oconee County, South Carolina.

TRACT TWO: ALL that certain piece, parcel, or lot of land containing $\frac{3}{4}$ acre (0.75 acre), more or less, said tract being a part of a 12-acre tract of land deeded to Henry McDaniel Alexander by John L. Kirby, by deed dated November 20, 1946, and recorded in the Office of the Clerk of Court for Oconee County, State of South Carolina, in Deed Book 5-U at Page 184.

This is the identical property conveyed to DOYLE E. PIERCE by deed from SHELL HOMES, INC. OF ANDERSON, dated March 30, 1971, and recorded in Deed Book 11-A at Page 54, in the records of Oconee County, South Carolina.

TRACT THREE: ALL that certain piece, parcel, or tract of land Situate in Return School District, Oconee County, South Carolina, containing Eight (8) acres, more or less. This land comprises the greater portion of the H.D. Alexander tract, which originally contained 12.3 acres, as shown on a plat prepared by Harry U. Earle, Surveyor, recorded in Plat Book J at Page 194, in the Office of the Clerk of Court for Oconee County, South Carolina.

This is being the remaining property conveyed to Doyle E. Pierce by deed from George W. Hill and Rosie A. Hill, dated May 19, 1976, and recorded in Deed Book 12-L at Page 427, in the records of Oconee County, South Carolina. *(See also Deed Book 653, Page 43).*

Reference: The original tract contained 10 acres, but 2 acres, more or less, were previously conveyed to Willie A. Leroy and Christine L. Leroy by deed of Doyle Elton Pierce, as described in Plat Book P-44 at Page 64 and recorded in Deed Book 11 at Page 243.

TRACT FOUR: ALL that certain piece, parcel, or lot of land situated in Return School District, Oconee County, South Carolina, containing 2.14 acres, more or less, and being more particularly described according to a plat of survey by Schumacher Engineering Service, dated May 21, 1973, and recorded in Plat Book P-37 at Page 145, in the records of Oconee County, South Carolina.

This is the identical property conveyed to Doyle E. Pierce by deed from Jack B. Medlin, dated March 13, 1978, and recorded in Deed Book 12-Z at Page 5, in the records of Oconee County, South Carolina. *(See also Deed Book 653, Page 63.)*

Said Property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 305-307.

Oconee County Tax Map No. 252-00-03-007

ALSO:

Legal Description: ALL that certain piece, parcel, or lot of land, situate, lying, and being in the State of South Carolina, County of Oconee, being shown and designated as Lot 15, The Woods Subdivision, on Plat dated July 1, 1981, recorded in Plat Book P-45, at Page 88, in the Register of Deeds Office for Oconee County, South Carolina, reference to which is hereby given for a more complete metes and bounds description thereof.

This property was conveyed to Doyle Pierce by deed of Dan Rankin Realty, Inc., recorded in Deed Book 1660, Pages 286-287, dated May 16, 2008, in the records of Oconee County, South Carolina.

This is the identical property transferred to the Grantor, Queen Dorothy Amolo Pierce through the estate of Doyle Elton Pierce, deceased by the deed of distribution dated March 10, 2025, and recorded in Deed Book 3191, pages 58 - 59, in the records of Oconee County, South Carolina.

Said Property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 300-301.

Oconee County Tax Map No. 252-00-03-056

ALSO:

Legal Description: All that certain parcel of land, situate, lying, and being in the County of Oconee, State of South Carolina, Seneca Township, Return Community, known and designated as Oak Ridge Circle in The Woods Subdivision.

The land contains the following metes and bounds, to wit: beginning at an iron pin in County Road known as South Radio Station Road, thence S78 03W for a distance of 384.64 feet; thence S78 19W for a distance of 11feet; thence S81 24W for a distance of 110 feet; thence S87 00W for a distance of 110 feet; thence N87 38 W for a distance of 100 feet; thence N82 33W for a distance of 100 feet; N80 00W for a distance of 175.94 feet; thence S62 00W for a distance of 104.97 feet; thence S63 57W for a distance of 3.62 feet; thence S39 54W for a distance of 20.41 feet; thence S72 14W for a distance of 83.32 feet; thence N28 08W for a distance of 39.41 feet; thence N26 30E for a distance of 52.13 feet; thence N85 03E for a distance of 45.62 feet; thence N88 06E for a distance of 20.41 feet; thence N63 59E for a distance of 4.10 feet; thence N29 00E for a distance of 29.07 feet; thence N37 11E for a distance of 89.13 feet; thence S54 16E for a distance of 70.47 feet; thence S45 00E for a distance of 29.07 feet; thence S80 00W 176.42 for a distance of 176.42 feet; thence S81 13 E for a distance of 45.63 feet; thence S85 26E for a distance of 112.50 feet; thence N88 34E for a distance of 112.50 feet; thence N82 54E for a distance of 100.00 feet; thence N79 08E for a distance of 41.2 feet; thence N78 03E for a distance of 384.66 feet; thence running along said County Road S11 56E for a distance of 50.33 feet to the place of beginning. All measurements being a little more or less.

Said Property was conveyed by Queen Dorothy Amolo Pierce to Apparatus LLC by that Quitclaim Deed dated and recorded on March 13, 2025 in the records of Oconee County, South Carolina in Deed Book 3192 at Page 302-304.

Oconee County Tax Map No. 252-00-03-091

Reference is also made to that Quit-Claim Deed from Gregory Alan Pierce, Donna Carol Moore, and Jared Adam Pierce to Queen Dorothy Amolo Pierce dated March 19, 2025, and recorded April 18, 2025 in Deed Book 3211, pages 336-341 for, *inter alia*, descriptions of the above parcels.