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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

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 TIME TO FILE RECORD ON APPEAL

COMES NOW the Appellant, **Dorothy Pierce**, respectfully moves this Honorable Court for a two-week extension of time to file the Record on Appeal in the above-captioned matter. In support of this Motion, Appellant states as follows:

1. The record in this matter is voluminous, encompassing substantial evidence and documentation generated over three years of active litigation, including dozens of hearings, numerous filings, a series of pre-hearing motions, and thousands of documents produced by several parties during discovery. Its preparation requires careful compilation, review, and organization to ensure full compliance with the South Carolina Appellate Court Rules.

2. Appellant has been working diligently to assemble the necessary materials; however, due to the size and complexity of the record, additional time is necessary to complete the process.
3. Appellant is the sole caregiver of two children under the age of three. During the relevant period, Appellant's husband was out of the country, leaving her without sufficient childcare.
4. On August 01, 2025, due to the substantial workload involved in preparing the record and constant interruptions from caring for her children, Appellant was compelled to book a flight for her husband to return from Uganda to assist with childcare. **See the attached Airline booking and Itinerary.**
5. On August 7, 2025, Appellant's husband arrived from Uganda, and Appellant had to travel to pick him up from the airport. As a result, the preparation of the Record on Appeal has been unavoidably delayed.
6. This request is made in good faith and not for purposes of delay. Granting this motion will not prejudice the Respondent but will ensure that the Record on Appeal is complete, accurate, and compliant with the rules of this Court.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant a two-week extension of time to file the Record on Appeal.

Respectfully submitted this 8th day of August 2025.

A handwritten signature in black ink, appearing to read 'Dorothy Pierce', written over a horizontal line.

DOROTHY PIERCE
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FOR THE APPELLANT