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**Aug 13 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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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.

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

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**MOTION TO EXTEND DEADLINE TO FILE INITIAL BRIEF OF APPELLANT,  
STATEMENT OF ISSUES ON APPEAL, AND DESIGNATION OF MATTER**

COMES NOW the Appellant, Dorothy Pierce, and respectfully moves this Honorable Court for a two-week extension of time to file her Initial Brief of Appellant, Statement of Issues on Appeal, and Designation of Matter in the above-captioned matter. In support of this motion, Appellant states as follows:

1. The issues on appeal involve multiple claims and procedural matters requiring extensive review of the trial record, prior motions, and relevant case law to ensure accurate and comprehensive briefing.
2. Appellant has been working diligently to prepare these filings; however, due to the complexity of the legal issues and the need to ensure all arguments are fully supported by the record and applicable authority, additional time is necessary to complete the process.
3. Appellant is the sole caregiver of two children under the age of three. During much of the relevant preparation period, Appellant's husband was out of the country, leaving her without sufficient childcare.
4. On August 1, 2025, due to the substantial workload involved in preparing these appellate filings and constant interruptions from childcare responsibilities, Appellant was compelled to book a flight for her husband to return from Uganda to assist with childcare. (See attached airline booking and itinerary.)

5. On August 7, 2025, Appellant's husband arrived from Uganda, requiring her to travel to pick him up from the airport. As a result, the preparation of the Initial Brief of Appellant, Statement of Issues on Appeal, and Designation of Matter 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 Initial Brief, Statement of Issues, and Designation of Matter are thorough, 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 Initial Brief of Appellant, Statement of Issues on Appeal, and Designation of Matter.

Respectfully submitted this 13th 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