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Aug 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232
Appellate Case No. 2025-000490

PlanetONE Packaging, LLC,Respondent,

v.

American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo Defendants,

OF WHOM Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263, SCACR Respondent PlanetONE Packaging, LLC (“Respondent”) respectfully moves for an extension of twenty (20) days from today to file Respondent’s Returns to two recent filings of Appellant Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Appellant”) in this Appeal:

- 1) Appellant’s “Petition for a Writ of Supersedeas (Motion for Stay Pending Appeal and Waiver of Supersedeas Bond)” and “Request for Expediated Consideration of Petition for Writ of Supersedeas” (the “**Petition**”); and
- 2) Appellant’s “Motion to Extend Deadline to File Initial Brief of Appellant, Statement of Issues on Appeal, and Designation of Matter” (the “**Motion**”).

I. Appellant's Petition

Based on a review of the publicly available documents on C-Track,¹ Appellant appears to have emailed this Court on August 11, 2025 at 4:42pm to file the Petition, which is comprised of a mass of documents that Appellant styled as the following in her correspondence:

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| <ol style="list-style-type: none">1. Appellant Dorothy Pierce's Petition for a Writ of Supersedeas (Motion for Stay Pending Appeal and Waiver of Supersedeas Bond)2. Appellant Dorothy Pierce's Motion for Expedited Consideration3. Affidavit of Appellant Dorothy Pierce4. Exhibits5. Proof of Service |
|---|

(See App. email to Court Aug. 11, 2025). Unfortunately, as has been routine in this Appeal and the prior unsuccessful appeals by Appellant, Appellant opted not to include undersigned counsel of record for Respondent on this filing with the Court nor did she effectuate proper service of the same as required by the Rules and orders of the South Carolina Supreme Court. Several days later, however, Respondent was made aware of the Petition and lack of service.

Nevertheless (specifically reserving all arguments and not conceding any issues, including service, notice, propriety, frivolousness, abandonment, sanctions, costs, merits, or otherwise), if the Court views Appellant's August 11, 2025 email quoted above as the effective date of service, Respondent's return to the Petition would be due today, August 21, 2025 per Rule 240(e), SCACR. Therefore, out of an abundance of caution, Respondent seeks an extension today.

If the Court grants Respondent's request for an extension of time to file a Return to the Petition, the new deadline would be September 10, 2025. This requested extension is not intended to hinder, delay, or prejudice the judicial proceedings. Given the circumstances of this case,

¹ Respondent notes there is no indication on C-Track that Appellant has paid the appropriate filing fee for the Petition as of the date of this filing.

counsel's prior commitments (professional and personal), and the nature of the Return that will be required to adequately address Appellant's entanglements, arguments, and procedural posture, Respondent respectfully requests this Court grant its motion for an extension of time to file a Return to the Petition under Rules 240(e) and 263(b), SCACR.

II. Appellant's Motion to Extend

Two days after Appellant's attempt to file, but not serve, her Petition as discussed above, she appears to have again emailed the Court in an attempt to file a "Motion to Extend Deadline to File Initial Brief of Appellant, Statement of Issues on Appeal, and Designation of Matter" (hereinafter "**Appellant's Motion to Extend**"). Again, this knowledge is based on a review of the publicly available documents on C-Track for this Appeal, which, as of yesterday, now contain Appellant's August 13, 2025 (10:45pm) email to the Court (again omitting service or copy of Respondent's counsel).² Moreover, it was only this week, on or about Monday August 19, 2025, that Respondent received a mailer from Appellant containing Appellant's Motion to Extend.

As noted above regarding the Petition, Appellant has made a practice of ignoring, among other things, the service and filing rules of this State and this Court such that the resulting delay is but one symptom of Appellant's filings and actions with respect to Respondent and this matter. Again—specifically reserving all arguments and not conceding any issues, including any regarding service, notice, propriety, frivolousness, abandonment, sanctions, costs, merits, or otherwise—if the Court views Appellant's August 13, 2025 email to the Court attempting to file her Motion to Extend as the effective date of service under the Rules, Respondent's Return to the Petition would be due, *at the earliest*, on Monday of next week, August 25, 2025 per Rule 240(e), SCACR.

² Just like the Petition, there is no indication on C-Track as to whether Appellant has paid the appropriate filing fee for her Motion to Extend as of the date of this filing.

Therefore, out of an abundance of caution, Respondent seeks an extension of the Return deadline (whatever it may be) to coincide with the requested extension for the Return to the Petition.

If the Court should grant Respondent's request for an extension of time to file a Return to Appellant's Motion to Extend, the new deadline would be the same September 10, 2025 date as the Petition. This requested extension is not intended to hinder, delay, or prejudice the judicial proceedings. Given the circumstances of this case, counsel's prior commitments (professional and personal), and the nature of the Return that will be required to adequately address Appellant's entanglements, arguments, and procedural posture, Respondent respectfully requests this Court grant its motion for an extension of time to file a Return to Appellant's Motion to Extend under Rules 240(e) and 263(b), SCACR.

III. Conclusion

Respondent respectfully asks this Court to exercise its discretion under the Rules to clarify and/or extend Respondent's deadline to file its Returns to Appellant's Petition and Appellant's Motion to Extend to September 10, 2025.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ J. Patrick Bradley
Christopher B. Major (SC Bar No. 72872)
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Attorneys for Respondent PlanetONE Packaging, LLC

August 21, 2025
Greenville, South Carolina

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PlanetONE Packaging, LLC,Respondent,

v.

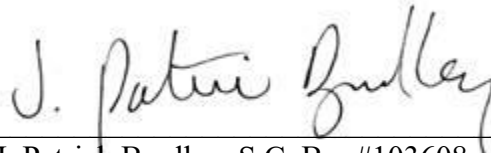
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo Defendants,

OF WHOM Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

PROOF OF SERVICE

I, the undersigned counsel for Respondent, do hereby certify that I have on August 21, 2025, caused *Respondent's Motion for Extension of Time* to be served via U.S. Mail on the opposing party of record, Appellant, who is proceeding pro se in this matter, at the address shown below:

Dorothy Pierce, pro se
750 Mourning Dove Lane
Seneca, SC 29678



J. Patrick Bradley, S.C. Bar #103608
Haynsworth Sinkler Boyd, P.A.
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August 21, 2025

VIA FIRST CLASS MAIL

Dorothy Pierce, pro se
750 Mourning Dove Lane
Seneca, SC 29678

RE: *PlanetONE Packaging, LLC v. American Pharma Machinery, LLC, and
Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a
Queen Dorothy Amolo*
C.A. No. 2023-CP-37-00232
Appellate Case No. 2025-000490

Ms. Pierce:

Please find enclosed for service upon you the following:

1. Respondent's Motion for Extension of Time; and
2. Proof of Service for the same.

These have also been filed with the Clerk of Court for the South Carolina Court of Appeals as of the date of this correspondence.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



J. Patrick Bradley

Enclosures