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Aug 25 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/a Dorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

Case No. 2023-CP-37-00232

Appellate Case No. 2025-00049

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 210(c), SCACR, Appellant Dorothy Pierce respectfully designates the following materials to be included in the Record on Appeal:

1. Notice of Appeal and proof of service (and any amended notices).
2. All pleadings filed in the above-captioned civil case, including the initial Complaint, the Amended Complaint, and the Appellant's Motion to Dismiss.
3. All motions, affidavits, and memoranda of law, including the Respondent's Motion for Entry of Default, the Appellant's Motion to Set Aside Default, the Respondent's Motion for Default Judgment, the Appellant's Motion to Reconsider, the Respondent's damages memorandum

with exhibits, and the Respondent's post-hearing Affidavit of Attorney's Fees (with any attached billing records and certificates of service).

4. All written orders and rulings issued by the Circuit Court, including but not limited to the June 20, 2023 Entry of Default, the November 6, 2023 Form 4 Order conditionally finding default, the December 5, 2023 order regarding additional authentication/login requirements, the January 16, 2024 Form 4 Order finalizing default, the February 6, 2024 order denying reconsideration, and the Final Judgment Order dated March 24, 2024, entered after the January 29, 2025 hearing (including any separate order on attorney's fees or post-judgment interest).
5. The sworn affidavit of Oscar Ojok, executed November 10, 2023, with attached Posta Uganda mailing receipts, submitted in compliance with the court's November 6, 2023 order.
6. Notices of Hearing and the complete, certified transcripts of all hearings held in this action—including, without limitation, the October 31, 2023 motions hearing and the January 29, 2025 damages/fees hearing—together with the court reporter's certificates, transcript indexes, exhibit lists (noting "no exhibits entered," if applicable), and any errata or corrections.
7. All materials submitted as exhibits in support of or in opposition to the motions for default and for damages, including all invoices, correspondence between the parties, and evidence of mitigation offers (whether or not admitted), and any exhibit indexes noting "no exhibits entered."
8. All email correspondence between the parties and with the court clerk, including but not limited to: the initial pre-litigation communications from December 2022 through February 2023 concerning the transaction, customization details, delays, and the Appellant's mitigation offers of a no-cost temporary machine, as well as the Respondent's rejection of those offers; the Appellant's July 21, 2023 email to the Court inquiring about her mailed responsive pleadings; the court clerk's October 24, 2023 email confirming receipt of the package from Uganda; the Appellant's October 30, 2023 email to Respondent's counsel and the court providing the Ugandan mailing receipt and counsel's reply questioning its authenticity; the November 10, 2023 email correspondence from the Appellant's representative providing the sworn affidavit of mailing to the court and opposing counsel, and counsel's email confirming

that a subsequent hearing would be held; and the December 8, 2023 email chain in which Respondent's counsel first admitted receipt of the sworn affidavit and then introduced demands for login credentials, along with the Appellant's reply.

9. Certificates/proofs of service and mailing records relevant to contested deadlines, including service of the January 29 Form 4 order and the fee affidavit (mailing envelopes, USPS/UGANDA Post tracking, and delivery confirmations).
10. Docket sheet/register of actions for the case.
11. Interlocutory appellate orders referenced in the brief (Court of Appeals dismissal of interlocutory appeal for service defect and Supreme Court order denying certiorari).
12. Any other relevant filings, evidence, or rulings expressly cited by the parties or the court in the default proceedings, damages hearing, or final order.

Signed and dated this 24th day of August 2025.

A handwritten signature in blue ink, consisting of several loops and flourishes, positioned above a horizontal line.

DOROTHY PIERCE

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FOR THE APPELLANT