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**Oct 07 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

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

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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.

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**RESPONDENT’S MOTION FOR EXTENSION OF TIME**

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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 Initial Brief; and Respondent’s Return(s) to Appellant Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Appellant”) two recently-filed documents – Appellant’s Motion to Strike Respondent’s Return to Stay and Appellant’s Reply to Return to Motion to Stay (filed September 19, 2025).

As Respondent has briefed at length in previous motions, memoranda, and returns in this court in response to Appellant’s filings, Appellant has failed and continues to fail to properly and/or timely serve Respondent with her filings before this court. Respondent learned of the

Appellant's filing of the Initial Brief (filed, per C-Track on August 25, 2025) and the September 19, 2025 Motions by reviewing C-Track, not receipt of proper service of any of these three filings.

Accordingly, Respondent needs additional time to prepare its response(s) to these filings, whether in the form of its own Initial Brief, Returns to the motions, or via a Motion to Dismiss.

If the Court grants Respondent's request for an extension of time to file its Initial Brief, Return(s) to Appellant's September 19, 2025 filings, or Motion to Dismiss in lieu of the same, the new deadline would be October 27, 2025. This requested extension is not intended to hinder, delay, or prejudice the judicial proceedings. Given the circumstances of this case and the nature of the filings 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 Initial Brief under Rules 240(e) and 263(b), SCACR.

Respondent respectfully asks this Court to exercise its discretion under the Rules to clarify and/or extend Respondent's deadline to file any Initial Brief, Return to currently-pending motions, or Motion to Dismiss to twenty (20) days from October 7, 2025 to October 27, 2025.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ J. Patrick Bradley  
Christopher B. Major (SC Bar No. 72872)  
J. Patrick Bradley (SC Bar No. 103608)  
ONE North Main Street, 2<sup>nd</sup> Floor  
P.O. Box 2048 (29602)  
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*Attorneys for Respondent PlanetONE Packaging, LLC*

October 7, 2025  
Greenville, South Carolina

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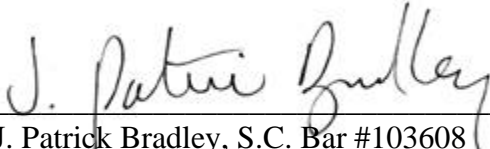
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo ..... Defendants,

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 October 7, 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.  
P.O. Box 2048  
Greenville, SC 29602  
864.240.3200 / [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

October 7, 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