

RECEIVED**Oct 07 2025****SC Court of Appeals****STATE OF SOUTH CAROLINA****In the Court of Appeals**

Appeal from Oconee County

Court of Common Pleas

Hon. R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232

Appellate Case No. 2025-00049

**Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo,
Appellant**

v.

PlanetONE Packaging, LLC, Respondent**APPELLANT'S RETURN AND MOTION TO DENY RESPONDENT'S MOTION FOR
EXTENSION OF TIME**

Appellant Dorothy Pierce, pro se, respectfully submits this Return and Motion to Deny Respondent's Motion for Extension of Time filed October 7, 2025, and shows as follows:

I. Respondent Missed the Deadline Under Rules 240 and 263 SCACR

Appellant filed and served her Return on **September 19, 2025**.

Under **Rule 240(f)**, any reply was due **five (5) days after service**, excluding weekends per **Rule 263**, making the deadline **Friday, September 26, 2025**.

Respondent filed no reply within that period and therefore forfeited its right to do so absent a showing of good cause—which it has not and cannot make.

II. Documented Service and Court-Confirmed Receipt**a) August 25 – Initial Brief and Designation of Matter.**

Appellant emailed her *Initial Brief, Statement of Issues, Designation of Matter*, and *Proof of Service* to the Court and all Respondent counsel (pbradley@hsblawfirm.com, cmajor@hsblawfirm.com, apack@hsblawfirm.com, kbailey@hsblawfirm.com) at 7:25 a.m. The Court confirmed receipt at 4:06 p.m., copying those same attorneys.

In addition to email service, a paper copy of each document was mailed the same day to Respondent's counsel at their Greenville office address pursuant to Rule 5(b)(1), SCRCF.

- b) **September 18 – Notice of Intent to File Reply.** Appellant emailed the Court and Respondent’s counsel, giving formal notice of her intent to file a Reply to Respondent’s Return to Petition for Writ of Supersedeas.
A mailed hard copy of this notice was also sent the same day.
- c) **September 19 – Reply, Motion to Strike, and Motion for Sanctions.** The next morning, Appellant served these filings by email and simultaneously mailed paper copies to Respondent’s counsel. The Court acknowledged receipt and docketing at 3:48 p.m. and 4:16 p.m. with stamped confirmations.

These records demonstrate **actual, contemporaneous notice** and **proper dual-mode service** under **Rule 262(a), SCACR** and **Rule 5(b)(1), SCRCP**.

Respondent’s claim that it “learned of filings only by reviewing C-Track” is false and cannot support any extension.

III. No Good Cause Shown; Respondent Must Be Sanctioned for Knowingly False Statements

Respondent has demonstrated no good cause under Rule 263(b), SCACR to justify any extension of time.

The record conclusively shows that Respondent’s attorneys, J. Patrick Bradley, Christopher B. Major, Angie Pack, and Kimberly Bailey, each received Appellant’s filings by email and U.S. Mail well in advance of the September 26, 2025 deadline. Every filing was served to their active Haynsworth Sinkler Boyd, P.A. email accounts, which they use daily for this and other court matters, and paper copies were mailed the same day to their Greenville office address in full compliance with Rule 5(b)(1), SCRCP and Rule 262(a), SCACR.

Despite this, Respondent’s counsel falsely represented to this Court that they “**learned of Appellant’s filings only through C-Track.**” That statement is knowingly false and constitutes a deliberate misrepresentation of material fact to the Court in violation of Rule 3.3(a)(1) of the South Carolina Rules of Professional Conduct (Rule 407, SCACR).

Such conduct is not a matter of mistake or oversight, it is intentional deception intended to obtain procedural advantage through falsehood.

Under these circumstances, Respondent not only lacks good cause for an extension but has affirmatively abused the appellate process.

Appellant therefore respectfully requests that the Court deny the motion in its entirety and impose appropriate sanctions or admonishment on Respondent’s counsel to deter further misrepresentations and preserve the integrity of the Court’s proceedings.

IV. Pattern of Misrepresentation and Delay:

Respondent's counsel have followed a consistent pattern of **falsely claiming non-service** to obtain procedural advantage. In the Court of Common Pleas, they employed the same tactic, asserting they had not been served despite documentary proof, to induce rulings in their favor. That conduct is now repeated before this Court through another false narrative of non-service and a post-deadline motion to excuse their inaction. This pattern evidences bad faith, delay, and abuse of process.

CONCLUSION

For the reasons set forth above, Respondent's Motion for Extension of Time must be **denied** in its entirety. The record clearly establishes that Respondent's counsel were properly served, by both email and mail, on multiple occasions, yet falsely represented to this Court that they "learned of the filings only through C-Track." Such knowing misrepresentation constitutes a serious violation of Rule 3.3(a)(1), Rule 407, SCACR, and demonstrates a continuing pattern of abuse of process carried over from the lower court proceedings.

Appellant therefore respectfully prays that this Honorable Court:

1. **DENY** Respondent's Motion for Extension of Time filed October 7, 2025;
2. **STRIKE OR DISREGARD** any untimely reply attempted after September 26, 2025;
3. **SANCTION OR ADMONISH** Respondent's counsel for making knowingly false statements to the Court; and
4. Grant such other and further relief as this Court deems just, equitable, and proper.

Respectfully submitted,

/s/ Dorothy Pierce

Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo

Pro Se Appellant

750 Mourning Dove Lane

Seneca, SC 29678

Tel: 864-324-3247 Email: DorothyPierce84@gmail.com

Date: October 7, 2025



Dorothy Pierce <dorothypierce84@gmail.com>

Notice of Intent to File Reply PlanetONE Packaging, LLC v. Dorothy Pierce Appellate Case No. 2025-000490

1 message

Dorothy Pierce <dorothypierce84@gmail.com> Thu, Sep 18, 2025 at 12:38 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>, "Bradley, Patrick" <pbradley@hsblawfirm.com>, "Major, Chris" <cmajor@hsblawfirm.com>, "Pack, Angie" <apack@hsblawfirm.com>, "Bailey, Kimberly" <kbailey@hsblawfirm.com>

Dear Clerk of Court,

I write to respectfully inform the Court that Respondents filed their Return to Appellant's Motion for Supersedeas on **September 10, 2025**. I did not receive a copy of this filing by mail until today, **September 17, 2025**.

Please be advised that I intend to file a formal reply within the appropriate time permitted by the Court's rules, calculated from the date of service.

Thank you for your attention to this matter.

--

DOROTHY PIERCE
Justice is not a Privilege but a Fundamental Human Right.
"TRUTH is TREASON in an EMPIRE of LIES"

750 Mourning Dove Lane, Seneca, SC.29678
Tel: 864-324-3247



Dorothy Pierce <dorothypierce84@gmail.com>

Appellate Case No. 2025-000490 Filing of Appellant's Reply to Respondent's Return to Petition for Writ of Supersedeas

4 messages

Dorothy Pierce <dorothypierce84@gmail.com>

Fri, Sep 19, 2025 at 12:01 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>, "Bradley, Patrick" <pbradley@hsblawfirm.com>, "Major, Chris" <cmajor@hsblawfirm.com>, "Pack, Angie" <apack@hsblawfirm.com>, "Bailey, Kimberly" <kbailey@hsblawfirm.com>

Clerk,

Please accept for filing the original and required copies of the following documents in the above-referenced appeal:

1. **Appellant's Reply to Respondent's Return to Petition for Writ of Supersedeas;**
2. **Motion to strike and Motion for sanctions.**
3. **Exhibits to Appellant's Reply; and**
4. **Proof of Service.**

Thank you for your attention to this matter.

Respectfully submitted,

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DOROTHY PIERCE

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"TRUTH is TREASON in an EMPIRE of LIES"

750 Mourning Dove Lane, Seneca, SC.29678

Tel: 864-324-3247

11 attachments**PROOF OF SERVICE- Reply to Return- Planetone.pdf**
144K**Reply to Respondent's return.docx**
26K**Respondent's Return to Appellant's Motion to Stay and Petition for Writ of Supersedeas - 9.10.25
11710369.1.pdf**
57K**Planeton Packaging LLC transcript vs. Dorothy Pierce_ 23-CP-37-00232 (3).pdf**
157K**PlanetOne v. Pierce - Consolidate (1).pdf**
117K**PlanetOne v. Pierce - Transcript.pdf**
229K**CONSENT ORDER- DOYLE PIERCE ESTATE.pdf**
2014K**Amended Order Affirming Private Family Agreement.pdf**
148K

 **email from Judge Singleton-No Inheritance-redacted.pdf**
406K

 **V2-APPELLANT'S REPLY TO RESPONDENT'S RETURN TO PETITION FOR WRIT OF SUPERSEDEAS.pdf**
337K

 **V-1 APPELLANT'S MOTION TO STRIKE AND FOR SANCTIONS.pdf**
203K

Dorothy Pierce <dorothypierce84@gmail.com>
To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Fri, Sep 19, 2025 at 3:25 PM

Clerk,

I would like to withdraw the only word document sent with the filing which is not part of this filing, included by mistake. The document is the second attachment named: Reply to Respondent's Return.

Thank you.

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"TRUTH is TREASON in an EMPIRE of LIES"

750 Mourning Dove Lane, Seneca, SC.29678
Tel: 864-324-3247

[Quoted text hidden]

Court Of Appeals Filings <ctappfilings@sccourts.org>

Fri, Sep 19, 2025 at 3:48 PM

To: Dorothy Pierce <dorothypierce84@gmail.com>, "Bradley, Patrick" <pbradley@hsblawfirm.com>, "Major, Chris" <cmajor@hsblawfirm.com>, "Pack, Angie" <apack@hsblawfirm.com>, "Bailey, Kimberly" <kbailey@hsblawfirm.com>

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

South Carolina Court of Appeals

[1220 Senate Street](#)

[Columbia, SC 29201](#)

Filings: ctappfilings@sccourts.org

Phone: (803) 734-1890



From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Friday, September 19, 2025 5:01 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Bradley, Patrick <pbradley@hsblawfirm.com>; Major, Chris <cmajor@hsblawfirm.com>; Pack, Angie <apack@hsblawfirm.com>; Bailey, Kimberly <kbailey@hsblawfirm.com>

Subject: Appellate Case No. 2025-000490 Filing of Appellant's Reply to Respondent's Return to Petition for Writ of Supersedeas






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[Quoted text hidden]

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#### 5 attachments

-  **PlanetONE v. Pierce - Exhibits.pdf**  
3326K
-  **PlanetONE v. Pierce - Motion to Strike.pdf**  
235K
-  **PlanetONE v. Pierce - POS.pdf**  
178K
-  **PlanetOne v. Pierce - Reply to Return.pdf**  
357K
-  **PlanetONE v. Pierce - Return to Motion.pdf**  
94K

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**Court Of Appeals Filings** <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

To: Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

Fri, Sep 19, 2025 at 4:16 PM

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**South Carolina Court of Appeals**

1220 Senate Street

Columbia, SC 29201

Filings: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Phone: (803) 734-1890



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**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

**Sent:** Friday, September 19, 2025 8:26 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Subject:** Re: Appellate Case No. 2025-000490 Filing of Appellant's Reply to Respondent's Return to Petition for Writ of Supersedeas

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Clerk,

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 **PlanetONE v. Pierce - Exhibits (UPDATED).pdf**
3038K



Dorothy Pierce <dorothypierce84@gmail.com>

Filing and Service: Initial Brief and Designation of Matter in Case No. 2025-00049, PlanetONE Packaging, LLC v. Dorothy Pierce

2 messages

Dorothy Pierce <dorothypierce84@gmail.com>

Mon, Aug 25, 2025 at 7:25 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>, "Bradley, Patrick" <pbradley@hsblawfirm.com>, "Major, Chris" <cmajor@hsblawfirm.com>, "Pack, Angie" <apack@hsblawfirm.com>, "Bailey, Kimberly" <kbailey@hsblawfirm.com>

Dear Clerk of Court,

Please allow this email to serve as the official filing in the above-referenced matter, **Appellate Case No. 2025-00049, PlanetONE Packaging, LLC v. American Pharma Machinery, LLC, and Dorothy Pierce.**

Attached for filing, please find the following documents on behalf of the Appellant, Dorothy Pierce:

1. **Initial Brief of Appellant**
2. **Statement of Issues on Appeal**
3. **Designation of Matter to be Included in the Record on Appeal**
4. **Proof of Service**

Thank you for your attention to this matter.

Respectfully,

--

DOROTHY PIERCEJustice is not a Privilege but a Fundamental Human Right.
"TRUTH is TREASON in an EMPIRE of LIES"

750 Mourning Dove Lane, Seneca, SC.29678

Tel: 864-324-3247

3 attachments **DESIGNATION OF MATTER - Planetone.pdf**
171K **POS-initial brief of Appellant- Planetone.pdf**
135K **Initial Brief of Appellant final draft V3.pdf**
533K

Court Of Appeals Filings <ctappfilings@sccourts.org>

Mon, Aug 25, 2025 at 4:06 PM

To: Dorothy Pierce <dorothypierce84@gmail.com>, Court Of Appeals Filings <ctappfilings@sccourts.org>, "Bradley, Patrick" <pbradley@hsblawfirm.com>, "Major, Chris" <cmajor@hsblawfirm.com>, "Pack, Angie" <apack@hsblawfirm.com>, "Bailey, Kimberly" <kbailey@hsblawfirm.com>

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Monday, August 25, 2025 12:25 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Bradley, Patrick <pbradley@hsblawfirm.com>; Major, Chris <cmajor@hsblawfirm.com>; Pack, Angie <apack@hsblawfirm.com>; Bailey, Kimberly <kbailey@hsblawfirm.com>

Subject: Filing and Service: Initial Brief and Designation of Matter in Case No. 2025-00049, PlanetONE Packaging, LLC v. Dorothy Pierce

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### 3 attachments



**PlanetONE v. Pierce - AIB.pdf**  
550K



**PlanetONE v. Pierce - DOM.pdf**  
205K



**PlanetONE v. Pierce - POS.pdf**  
170K

**RECEIVED****Oct 07 2025****SC Court of Appeals****STATE OF SOUTH CAROLINA****In the Court of Appeals**

Appeal from Oconee County

Court of Common Pleas

Hon. R. Lawton McIntosh, Circuit Court Judge

Case No. 2023-CP-37-00232

Appellate Case No. 2025-00049

**Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo,  
Appellant**

v.

**PlanetONE Packaging, LLC, Respondent****CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2025, I served a true and correct copy of the foregoing *Return and Motion to Deny Respondent's Motion for Extension of Time* upon counsel for Respondent by depositing the same in the United States Mail, postage prepaid, and by email to:

**J. Patrick Bradley, Esq. | Christopher B. Major, Esq. | Angie Pack | Kimberly Bailey**

Haynsworth Sinkler Boyd, P.A.

P.O. Box 2048, Greenville, SC 29602

pbradley@hsblawfirm.com cmajor@hsblawfirm.com apack@hsblawfirm.com

kbailey@hsblawfirm.com

**/s/ Dorothy Pierce**

Dorothy Pierce

750 Mourning Dove Lane

Seneca, SC 29678

Tel: 864-324-3247 Email: Dorothypierce84@gmail.com

Date: October 8, 2025