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Dec 18 2025

SC Court of Appeals

THE SOUTH CAROLINA COURT OF APPEALS

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.

Appellate Case No. 2025-000490

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE RETURN
TO RESPONDENT'S RENEWED MOTION TO DISMISS**

Appellant, Dorothy Pierce, appearing pro se, respectfully moves this Court pursuant to Rule 263, SCACR, for an extension of time to serve and file her Return to Respondent's Renewed Motion to Dismiss. In support of this motion, Appellant states as follows:

Respondent filed a Renewed Motion to Dismiss; however, Appellant has not been properly served with that filing in accordance with the South Carolina Appellate Court Rules. Appellant became aware of the filing through indirect means and is unable to confirm the date or manner of service or to calculate a response deadline with certainty.

Appellant is currently physically present in Uganda, where she is actively engaged in a national election as a candidate for Oyam County South campaign, with voting scheduled for January 15, 2025. This campaign involves extraordinarily demanding and inflexible schedules, significantly limiting Appellant's available time for legal work.

In addition, since arriving in Uganda, Appellant and her minor children have experienced a series of medical emergencies and recurring illnesses requiring attention and care, including **malaria caused by mosquito bites**, persistent cold symptoms, and **pneumonia-related complications**. These circumstances, together with Appellant's caregiving responsibilities, have further constrained Appellant's ability to prepare and file a timely and complete response absent a brief extension. **(See medical reports attached herein)**

Appellant is acting diligently and in good faith to prepare a thorough Return that fully addresses Respondent's Renewed Motion to Dismiss and the procedural issues it raises. This request is not made for purposes of delay, and granting a short extension will not prejudice Respondent.

Appellant therefore respectfully requests an extension of days, measured from the date proper service is effected or from such date as the Court deems appropriate, to serve and file her Return.

WHEREFORE, Appellant respectfully requests that this Court grant the requested extension of time and for such other and further relief as the Court deems just and proper.

Signed and dated this December 18, 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

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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

PROOF OF SERVICE

I, Dorothy Pierce, Appellant, on this December 18, 2025, hereby certify that I have this day served a true and correct copy of **Motion for extension of time to file a return to the Motion to Dismiss** upon counsel for the Respondent by email and by depositing the same in the United States Mail, first-class postage prepaid, and properly addressed as follows:

Christopher B. Major
J. Patrick Bradley
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, SC 29602-2048
Attorneys for Respondent

Respectfully submitted this December 18, 2025.



DOROTHY PIERCE
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FOR THE APPELLANT