

**Feb 04 2026**

**SC Court of Appeals**

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February 4, 2026

**VIA EMAIL AND US MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: Respondent's Notice of Intent to File Reply to Appellant's Return to MTD**  
*PlanetONE Packaging, LLC v. Dorothy Pierce & American Pharma Machinery, LLC*  
Appellate Case No. 2025-000490

Dear Ms. Kitchings:

This firm represents the Respondent, PlanetONE Packing, LLC (“Respondent”) in the above-referenced appeal. Respondent’s Motion to Dismiss this appeal is currently pending before the Court. On January 27, 2026, Appellant Dorothy Pierce (“Appellant”) filed a Return to our Motion. However, as of the date of this letter, Appellant—a pro se litigant—has failed to serve Respondent with the Return in order for the five-day deadline to trigger for Respondent’s Reply under Rule 240(f), SCACR. *See id.* (“The moving party shall have five (5) days from the date of service of a return to file a reply with the clerk and serve on all parties a copy of the reply.”). Indeed, in the circuit court, during Appellant’s first appeal, and now this appeal, Appellant’s refusal to abide by the service rules and deadlines of our state courts has caused numerous procedural delays, just like this one.

Despite the fact that Appellant’s Return remains unserved (as it was only sent to Respondent’s undersigned counsel via email),<sup>1</sup> I write to advise that Respondent still intends to prepare and file a Reply to the Appellant’s Return in short order (but no later than close of business on Monday

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<sup>1</sup> As Appellant is well aware (given multiple briefings in this matter on the issue before), the South Carolina Supreme Court’s May 6, 2022 Order concerning electronic service notes that “A self-represented litigant who is not a lawyer admitted to practice in this state may consent in writing to be served by e-mail and designate a correct e-mail address for service. *A lawyer may consent in writing to accept service by e-mail from a self-represented litigant.*” *See* Order 2022-05-06-04 (emphasis added). We have not consented to e-mail service with Appellant due to, among other things, numerous abuses of email communications by Appellant over the course of this matter, including her practice of emailing judicial chambers, clerks of court, and others with inappropriate, false, and inflammatory correspondence.

**HAYNSWORTH  
SINKLER BOYD**

February 4, 2026

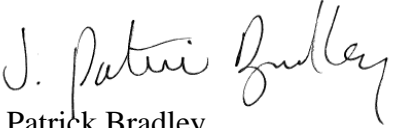
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February 9, 2026—the earliest possible Reply deadline if service of the Return comes to fruition today). It is our intention to file the Reply as soon as possible (subject to all defenses concerning service failures) in order to ensure a full, sensibly-timed briefing is finalized for the Court’s consideration of our pending Motion to Dismiss this second appeal.

If you need anything further from my office in the meantime, please do not hesitate to contact me via phone or email. I appreciate your consideration of this timeline and hope this notice is sufficient for the Court’s purposes – if not, please let me know.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.

  
J. Patrick Bradley

cc: Dorothy Pierce, pro se Appellant ([dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com))