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Feb 09 2026

SC Court of Appeals

From: [Dorothy Pierce](#)
To: [Court Of Appeals Filings](#)
Cc: [Bailey, Kimberly](#); [Major, Chris](#); [Bradley, Patrick](#); [Pack, Angie](#); [Lollis, Paula](#)
Subject: Re: PlanetOne Packaging, LLC. v. Dorothy Pierce & American Pharma Machinery, LLC; C.A. No.: 2025-000490
Date: Monday, February 9, 2026 9:58:36 AM

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Subject: Response Regarding Service – Appellate Case No. 2025-000490

Clerk Kitchings,
Counsel:

Appellant responds to Respondent’s February 4, 2026 correspondence regarding alleged “non-service” of Appellant’s Return to the Motion to Dismiss in PlanetONE Packaging, LLC v. American Pharma Machinery, LLC, et al., Appellate Case No. 2025-000490.

Respondent has, in fact, been served. The Return was transmitted by email and mailed to Respondent’s counsel in the same manner consistently used throughout this appeal. Respondent’s own letter confirms receipt of the filing by email. Respondent therefore possesses actual notice and cannot credibly claim lack of service.

The practical effect of Respondent’s February 4 letter is not to identify a genuine service failure but to obtain additional time to prepare a reply while framing the issue as “non-service.” Respondent acknowledges possession of the filing yet attempts to reset deadlines by characterizing acknowledged service as defective. This is consistent with Respondent’s repeated pattern in this appeal of denying service, rejecting hand delivery, or asserting non-service immediately after filings are made despite documented transmission.

Respondent has previously imposed extra-rule demands, including insisting that mailing envelopes themselves be handwritten by Appellant personally, despite no such requirement existing under the South Carolina Appellate Court Rules. These assertions reflect a dispute over the manner of service, not a genuine lack of notice or receipt.

Appellant is a pro se litigant serving filings internationally from Uganda and has complied in good faith with the rules while bearing the burden of international mailing. Respondent, by contrast, continues to rely on electronic filing yet seeks procedural advantage by characterizing acknowledged filings as “unserved.” The record reflects that Respondent is fully aware of the Return and intends to prepare a reply; no prejudice exists.

Appellant respectfully requests that the Court recognize Respondent’s acknowledgment of receipt and allow the appeal to proceed without further delay based on arguments framed as service defects but functioning as requests for additional response time.

Respectfully submitted,

Dorothy Pierce, Pro Se Appellant
dorothypierce84@gmail.com

On Wed, Feb 4, 2026 at 5:07 PM Court Of Appeals Filings <ctappfilings@sccourts.org> wrote:

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

Thank you!

From: Bailey, Kimberly <kbailey@hsblawfirm.com>

Sent: Wednesday, February 4, 2026 8:44 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Major, Chris <cmajor@hsblawfirm.com>; Bradley, Patrick <pbradley@hsblawfirm.com>; Pack, Angie <apack@hsblawfirm.com>; Lollis, Paula <plollis@hsblawfirm.com>; Dorothy Pierce <dorothypierce84@gmail.com>

Subject: PlanetOne Packaging, LLC. v. Dorothy Pierce & American Pharma Machinery, LLC; C.A. No.: 2025-000490

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Dear Clerk,

Please find attached Mr. Bradley's correspondence of today's date regarding the above-referenced matter for filing with the Court. I have copied Appellant on this email to provide a courtesy copy and have placed hard copies of the same in today's mail.

Thank you and please let me know if you need anything further.

Kim Bailey

Kimberly W. Bailey | Paralegal

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**DOROTHY PIERCE**

**Justice is not a Privilege but a Fundamental Human Right.**

**"TRUTH is TREASON in an EMPIRE of LIES"**

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