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Feb 09 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

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

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 theAppellant.

**RESPONDENT’S REPLY TO APPELLANT’S RETURN TO
RESPONDENT’S MOTION TO DISMISS APPEAL**

In Reply, Respondent opts not to dignify the predictably abusive, erratic, and procedurally and legally flawed opinions of Appellant, who has admitted in her most recent email to the Court, as of this morning, that she is in Uganda and thus, cannot and has not been serving Respondent via U.S. Mail. We have, somewhat remarkably, come full circle. The entire crux of the first appeal in this matter – which Appellant lost via dismissal – hinged on her default and failure to respond in a timely manner to Respondent’s complaint in the circuit court. Now Appellant seeks to obscure her failure to follow the rules of service. Respondent would reiterate that it has not consented to email service due to Appellant’s serial misuse of email, which she has again demonstrated in her most recent communication. Given that Appellant has not attempted and apparently cannot

attempt proper service in this Appeal given her absence from the United States, the failure of service argument made in the Motion to Dismiss is all but admitted.

Appellant's remaining contentions are contradicted by an even casual reading of the briefs, record, and facts in this matter – Appellant's "Return" to Respondent's pending Motion to Dismiss this second appeal is but an airing of grievances and a final, vain attempt to: (1) relitigate issues resolved in the circuit court (but not preserved for appeal); (2) relitigate issues dispensed with in full in the first appeal (dismissed by this Court); (3) present completely inaccurate and false citations to non-existent legal authority to support unintelligible legal and factual propositions; and (4) prolong the ongoing waste of judicial resources and Respondent's resources in giving Appellant's arguments any more attention.

Accordingly, this Court should dismiss this appeal, sanction Appellant as the Court deems proper given the circumstances, and award Respondent attorneys' fees in the full amount permitted by the South Carolina Appellate Court Rules.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Christopher B. Major

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

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*Attorneys for Respondent PlanetONE Packaging,
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February 9, 2026
Greenville, South Carolina

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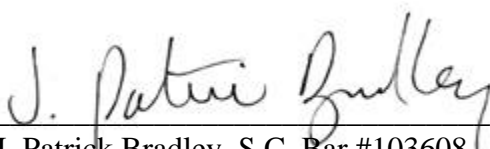
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo Defendants,

OF WHOM Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo is theAppellant.

PROOF OF SERVICE

I, the undersigned counsel for Respondent, do hereby certify that I have on February 9, 2026, caused *Respondent's Reply to Appellant's Return to Respondent's Motion to Dismiss* 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
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February 9, 2026

VIA FIRST CLASS MAIL

Dorothy Pierce, pro se
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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 Reply to Appellant's Return to Respondent's Motion to Dismiss;
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