

RECEIVED

Feb 12 2026

SC Court of Appeals

Date: 11/10/2023

Christopher Major:

1 North Main St, 2nd Floor, Greenville, SC,29601, USA.

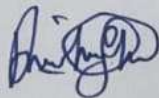
Oconee Court of Common Pleas,

205 W. Main St, Walhalla, SC. 29691, United States

**AFFIDAVIT OF MAILING**

I, OSCAR OJOK, of Namugongo, Kampala, Uganda, do solemnly make oath and state that:

1. I am an adult male Ugandan of sound mind and a law-abiding citizen.
2. I'm the Personal Assistant of Queen Dorothy Amolo.
3. When Queen Dorothy is in Uganda, I'm run all her personal errands.
4. On June 01, 2023, I was tasked with the responsibility of mailing court papers to:  
Oconee Court of Common Pleas, 205 W. Main St, Walhalla, SC. 29691, United States  
and Christopher Major: 1 North Main St, 2nd Floor, Greenville, SC,29601, USA.
5. I mailed the documents via Posta Uganda which a government owned courier agency and retained the copies of receipts on my file.
6. When Queen Dorothy returned to the USA in July 2023, she asked me to provide a copy of the receipts for mailing the documents because apparently the documents had not yet been delivered to the addresses. I sent her the copies of mailing receipts.
7. On October 04, 2023, Posta Uganda notified me the packages that I mailed were being returned to Uganda because they were Undeliverable.
8. We notified Queen Dorothy who then instructed me to ask Posta Uganda to remail the Packages.
9. Posta Uganda asked me to confirm that the addresses were correct. Queen Dorothy confirmed that the addresses were correct but "1" had to be separated from "North" as it seemed to be joined together on the mail to Christopher Major.
10. Posta Uganda remailed the packages on or about October 10, 2023, to the addresses at no additional fee.



11. Whatever I have stated herein is true and correct to the best of my knowledge,  
information, and belief.

SWORN AT KAMPALA THIS 10<sup>th</sup> DAY OF NOVEMBER, 2023

OJOK OSCAR



(DEPONENT)

BEFORE ME:

\_\_\_\_\_  
COMMISSIONER FOR OATHS



DRAWN & FILED BY: THE DEPONENT

**RECEIVED****Feb 12 2026****SC Court of Appeals****RECEIPT****Kampala GPO****RECEIPT No.: B-GPO-76-29340****TIN: 1000027427**

P.o Box 7106 Kampala, Phone: 0414255511

Date: 2023-06-01 10:52:26

Pay Method: Cash

Destination (Country) United States Of America

Destination (Station)

Item. No. RR224086369UG

Item Weight(Gms). 47

Sender Name. OSCAR OJOK

Sender Address KAMPALA  
UGANDA

Sender Contact. 0786627801

Reciever: OCONEE COURT OF  
COMMON PLEASReciever Address. 205 W MAINST.  
WALHALLA SC  
29691 USA

Reciever Contact. +8649167303

Vat UGX 0

Postage Fee. UGX 15,957

.....  
**Total: UGX 15,957**You Were Served By Finugaita  
Thank You!!! Please Come Again

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**Feb 12 2026**

**SC Court of Appeals**

**RECEIPT**



**Kampala GPO**

**RECEIPT No.: B-GPO-76-29339**

**TIN: 1000027427**

Po Box 7106 Kampala, Phone: 0414255511

Date: 2023-06-01 10:47:01  
Pay Method: Cash

Destination (Country) United States Of America

Destination (Station)

Item No. RR224086390UG

Item Weight(Gms). 47

Sender Name. OSCAR OJOK

Sender Address KAMPALA  
UGANDA

Sender Contact. 0786627801

Reciever: CHRISTOPHER  
MAJOR

Reciever Address. IN MAIN ST 2ND  
FLOOR  
GREENVILLE SC  
29601 USA

Reciever Contact. +8642403211

Vat UGX 0

Postage Fee. UGX 15,957

**Total: UGX 15,957**

You Were Served By Finugaita  
Thank You!!! Please Come Again

Dorothy Perry  
750 Midway Ave. Case  
Socora SC 29678

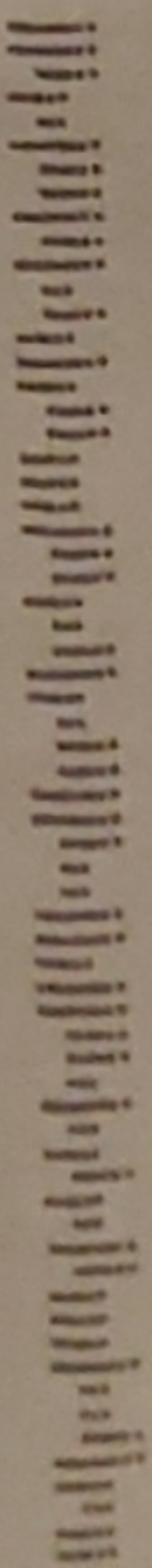
Chris Major  
1 North main St.  
Greenville SC 29601

3/12/2025

RECEIVED  
Feb 12 2026  
SC Court of Appeals

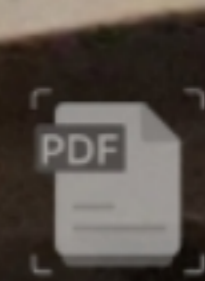
9327010744232405

29601-277202



NI XIE 296 CE 1 0103/26/25  
RETURN TO SENDER  
INSUFFICIENT ADDRESS  
UNABLE TO FORWARD  
BC: 29678  
\*0954-05582-13-42

GREENVILLE SC 296  
13 MAR 2025 PM 1 L



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**Mar 13 2025**

**SC Court of Appeals**

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**Feb 12 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 the .....Appellant.

**MOTION TO DISMISS APPEAL**

Pursuant to Rules 240 and 269, SCACR, PlanetONE Packaging, LLC (“Respondent”) hereby moves for the dismissal of Appellant Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Pierce” or “Appellant”) appeal on the grounds that the appeal: (1) is untimely; (2) was not properly served; (3) is interlocutory; and (4) is frivolous.

PlanetONE further asks that this motion be decided on an expedited basis so that Pierce may not continue to use the appellate process to evade and delay entry of a final judgment.

**BACKGROUND**

By way of background, this is yet another unserved, interlocutory, and frivolous appeal filed by Pierce in the course of this matter. This time, Pierce’s appeal appears to be based off of

two Form 4 Orders issued by the Honorable R. Lawton McIntosh in this case: The first Order was entered on January 31, 2025, in which the circuit court ordered, in pertinent part, as follows:

**DAMAGES AWARDED EXCLUDING ATTORNEY'S FEES. PLAINTIFF IS TO FILE AN AFFIDAVIT FOR ATTORNEY'S FEES AND SERVE DEFENDANT WITHIN TEN (10) DAYS. DEFENDANT HAS THE RIGHT TO REQUEST CROSS EXAMINATION OF PLAINTIFF'S COUNSEL. SUCH REQUEST MUST BE MADE IN WRITING WITHIN FIVE (5) DAYS OF THIS ORDER BEING FILED.**

**MR. BRADLEY [Respondent's counsel] TO PREPARE A FORMAL ORDER SUBSEQUENT TO THE ISSUE OF ATTORNEY'S FEES BEING DETERMINED.**

This Order was served on Pierce via mail on January 31, 2025 (*see Exhibit A* – COS and copy of envelope), and Pierce cannot use a manufactured date of receipt of February 13, 2025 (as referenced in her Notice of Appeal) to try and save the timeliness of this appeal. *See* Rule 6(e), SCRCP (“Whenever a party has the right or is required to do some act or take some proceedings within a prescribed period after the service of a notice or other paper . . . and the notice of paper is served upon him by mail . . . five days shall be added to the prescribed period.”). Under any math, and irrespective of service defects regarding the notice (which Respondent addresses below), Pierce’s notice of appeal was not filed until March 12, 2025 and is untimely.

The second order was entered on February 26, 2025 following Plaintiff’s submission of its affidavit of attorneys’ fees, in which the circuit court ordered, in pertinent part, as follows:

**DEFENDANT'S MOTION IS TREATED AS A MOTION TO CROSS EXAMINE COUNSEL ON ATTORNEY FEES. DEFENDANT'S REQUEST TO CROSS EXAMINE IS UNTIMELY AND THEREFORE DENIED. ORDER ISSUED WITHOUT A FORMAL HEARING. NO FORMAL ORDER IS REQUESTED.**

Despite Pierce being copied on correspondence between Respondent’s counsel and the circuit court regarding the forthcoming proposed order requested by Judge McIntosh (*see Exhibit B*), Respondent still proceeded to file a notice of appeal the same day. Indeed, not only did Pierce fail

to serve her notice of appeal on Respondent as required by the Rules, both of these orders are interlocutory, not appealable, and are being used by Pierce to again delay the inevitable – the entry of a final judgment against her and her company, American Pharma.

### **LEGAL STANDARD**

“An appeal ordinarily may be pursued only after a party has obtained a final judgment.” *Hagood v. Sommerville*, 362 S.C. 191, 194, 607 S.E.2d 707, 708 (2005). “A final judgment is one that ends the action and leaves the court with nothing to do but enforce the judgment by execution.” *Tillman v. Tillman*, 420 S.C. 246, 249, 801 S.E.2d 757, 758 (Ct. App. 2017). “An order reserving an issue, or leaving open the possibility of further action by the trial court before the rights of the parties are resolved, is interlocutory.” *Id.* “An interlocutory order not governed by a specialized appealability statute is not immediately appealable unless it fits into one of the categories listed in section 14-3-330 of the South Carolina Code.” *Thornton v. S.C. Elec. & Gas Corp.*, 391 S.C. 297, 300, 705 S.E.2d 475, 477 (Ct. App. 2011). None of the circumstances set forth in section 14-3-330 of the South Carolina Code are applicable here. *See* S.C. Code Ann. § 14-3-330.

### **ARGUMENT**

As noted by former Chief Justice Jean H. Toal, “[b]ecause motions are used in the appellate courts to seek specific relief, there is no limit to the type of motion that could be filed in the appellate courts.” Jean H. Toal *et al.*, *Appellate Practice in South Carolina* 379 (3d ed. 2016).

This matter has already dragged on for more than two years. Pierce’s instant attempt to delay this matter via the filing of successive, baseless motions, and appeals should be rejected for any one of the three reasons set forth herein. This appeal should be dismissed on the following grounds:

**I. The Orders Are Interlocutory and Not Immediately Appealable**

The two Form 4 Orders referenced in Pierce’s Notice of Appeal are interlocutory in that they are not final judgments. *See, e.g., Hagood*, 362 S.C. at 194, 607 S.E.2d at 708 (“An appeal ordinarily may be pursued only after a party has obtained a final judgment.”); *see also Tillman*, 420 S.C. at 249, 801 S.E.2d at 758 (“A final judgment is one that ends the action and leaves the court with nothing to do but enforce the judgment by execution.”). The plain language of the Orders and the correspondence with the court and all parties alone demonstrates that these are clearly not final judgments. In fact, if anything, it is clear that this appeal is one of a long line of deliberate tactics designed by Pierce to try and avoid the entry of a final judgment against herself and her company. Given the above, this Court lacks jurisdiction to entertain this appeal. Accordingly, the appeal must be dismissed.

**II. Notwithstanding the Lack of Appealability of the Orders, Pierce Has Failed and Refused to Effectuate Proper Service of the Notice of Appeal and her Attempt to Appeal the January 31, 2025 Order Is Untimely.**

First, any attempt being made by Pierce to appeal the circuit court’s January 31, 2025 order was not timely filed served, as it was filed more than “thirty (30) days after receipt of written notice of entry of the order.” *See* Rule 203(b)(1), SCACR. Indeed, Appellant filed her Notice of Appeal on March 12, 2025, well after thirty days had passed from the service of the court’s January 31, 2025 order had occurred. Second, and similarly, any appeal of the circuit court’s February 26, 2025 has still not been served by Appellant on Respondent as required by Rule 203(b), SCACR.

As a threshold issue, Appellant still has not served Respondent with the notice of appeal as required by the Rules and has indicated a refusal to do so under the Rules and Procedures of this state. *See* Rule 203(b), SCACR (“A notice of appeal shall be served on all respondents within thirty days after receipt of written notice of entry of the order . . . .”). **Exhibit C** hereto is the

Certificate of Service Peirce provided via email to Respondent’s counsel, in which she admits that she is only attempting to serve the “Notice of Appeal to the respondent utilizing Electronic Service.” *See Exhibit C*. Reflecting a pattern of failure to appreciate the rules, refusal to abide by them, and ongoing litigation abuse, Pierce fails to accept that – as a pro se litigant – she is not at liberty to serve attorneys licensed in this state via electronic service without their express consent. In addition, she refuses to engage in appropriate mail service of any document on Respondent, and has made it her mission to create as much waste, expense, and delay as possible in this matter.

As Pierce 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*.

To date, Pierce has only emailed her Notice of Appeal to counsel for PlanetONE. (**Exhibit C**). As of March 13, 2025, service has not been effected or even attempted upon PlanetONE via any proper service method provided under the South Carolina Rules of Civil Procedure. Additionally, Pierce has neither sought nor obtained PlanetONE’s consent to be served via electronic means—and PlanetONE will not consent to such. Finally, Pierce remains a pro se litigant in this matter – her attorney having withdrawn last year. Therefore, service has not been effected and the Notice of Appeal should be dismissed. Pierce’s purported proof of service fails to satisfy the service of process requirements under the rules. *See, e.g., Rule 4(g), SCRC* (“If service was by mail, the person serving process shall show in his proof of service the date and place of mailing, and attach a copy of the return receipt or returned envelope when received by him showing whether the mailing was accepted, refused, or otherwise returned.”).

**III. The Appeal is Frivolous and is an Attempt to Delay This Matter Further.**

Given the time and legal fees involved in responding to all of Pierce's appellate and trial court filings, PlanetONE continues to be damaged in both time spent and costs associated with Pierce's ongoing attempts to evade responsibility in the South Carolina court system. This is now her second appeal to the Court of Appeals, which failed the first time. It is clear that this is a frivolous Appeal filed only for the purposes of delay of an actual final judgment in this case as set forth above. As such, this motion should be granted and this appeal dismissed so that the circuit court may enter its long-awaited and, as shown in Exhibit B and the orders at issue, forthcoming final order of judgment against American Pharma and Pierce.

**IV. CONCLUSION AND REQUEST FOR EXPEDITED CONSIDERATION**

An appellant who fails to follow procedural requirements strips the court of appellate jurisdiction. *State v. Brown*, 358 S.C. 382, 387, 596 S.E.2d 39, 41 (2004); *Great Games, Inc. v. S.C. Dep't of Revenue*, 339 S.C. 79, 83 n. 5, 529 S.E.2d 6, 8 n. 5 (2000); *see also* Rule 260(a), SCACR (requiring dismissal of an appeal when an appellant fails to comply with the Appellate Court Rules). Given any one of the reasons set forth herein, this Court lacks jurisdiction to entertain this appeal. Accordingly, the appeal must be dismissed.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ J. Patrick Bradley

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

ONE North Main Street, 2<sup>nd</sup> Floor

P.O. Box 2048 (29602)

Greenville, SC 29601

(864) 240-3200

[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

*Attorneys for Respondent PlanetONE Packaging, LLC*

March 13, 2025  
Greenville, South Carolina

**Exhibit A**

**RECEIVED**

**Feb 12 2026**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

COUNTY OF OCONEE

PlanetONE Packaging, LLC,

Plaintiff,

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.

IN THE COURT OF COMMON PLEAS

C.A. No.: 2023-CP-37-00232

**CERTIFICATE OF SERVICE**

I, the undersigned attorney for Plaintiff, PlanetONE Packaging, LLC, hereby certify that on January 31, 2025, I caused the Order filed by the Court on January 31, 2025 to be served upon Defendant Dorothy Pierce, pro se, via U.S. Mail, postage prepaid as indicated below:

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678  
[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)

s/ Christopher B. Major \_\_\_\_\_  
Christopher B. Major (SC Bar No. 72872)  
ONE North Main Street, 2<sup>nd</sup> Floor (29601)  
P.O. Box 2048  
Greenville, South Carolina 29602  
(864)-240-3200  
[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

*Attorney for Plaintiff PlanetONE Packaging, LLC*

**HAYNSWORTH  
SINKLER BOYD**

P.O. BOX 2048  
GREENVILLE, SOUTH CAROLINA 29602-2048



US POSTAGE PAID BY MARTINEY BOWES



ZIP 29601 \$ 000.97<sup>0</sup>  
02 4W  
0000391091 JAN 31 2025

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678

**Exhibit B**

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**Feb 12 2026**

**SC Court of Appeals**

## Bradley, Patrick

---

**From:** McIntosh, Lawton Secretary (Tammy Jennings) <Imcintoshsc@sccourts.org>  
**Sent:** Wednesday, March 12, 2025 3:34 PM  
**To:** Bradley, Patrick; Dorothy Pierce; McIntosh, Lawton Law Clerk (Kjursten Collier); Amanda Watkins; Major, Chris; Pack, Angie; Bailey, Kimberly  
**Subject:** RE: Formal Order of Default Judgment 2023-CP-37-00232

Mr. Bradley,

Please e-file a proposed order on this matter for review.

Thank you,

*Tammy Jennings*  
Administrative Assistant  
Judge R. Lawton McIntosh  
P.O. Box 8002  
Anderson, SC 29622  
(864)- 260-4059  
Imcintoshsc@sccourts.org

---

**From:** Bradley, Patrick <pbradley@hsblawfirm.com>  
**Sent:** Tuesday, March 11, 2025 4:07 PM  
**To:** Dorothy Pierce <dorothypierce84@gmail.com>; McIntosh, Lawton Secretary (Tammy Jennings) <Imcintoshsc@sccourts.org>; McIntosh, Lawton Law Clerk (Kjursten Collier) <Imcintoshlc@sccourts.org>; Amanda Watkins <awatkins@oconeesc.com>; Major, Chris <cmajor@hsblawfirm.com>; Pack, Angie <apack@hsblawfirm.com>; Bailey, Kimberly <kbailey@hsblawfirm.com>  
**Subject:** RE: Formal Order of Default Judgment 2023-CP-37-00232

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

Judge McIntosh:

On behalf of the Plaintiff PlanetONE Packaging, LLC, I am writing to ask whether the Court needs anything further from my office regarding the final amount of damages and fees sought in the matter, or to request a status conference regarding the court's forthcoming judgment against the Defendants, if the Court deems it appropriate. For several reasons, we want to make sure the Court is not waiting on anything from Plaintiff at this time. One reason being – it has come to our attention that Ms. Pierce has, or is currently in the process of, attempting to hide, disburse, or transfer assets (including significant real property holdings in Oconee County) in a clear effort to try and subvert the forthcoming judgment in Plaintiff's favor in this matter.

In your January 31, 2025 Form 4 Order, the Court ordered as follows:

**DAMAGES AWARDED EXCLUDING ATTORNEY'S FEES. PLAINTIFF IS TO FILE AN AFFIDAVIT FOR ATTORNEY'S FEES AND SERVE DEFENDANT WITHIN TEN (10) DAYS. DEFENDANT HAS THE RIGHT TO REQUEST CROSS EXAMINATION OF PLAINTIFF'S COUNSEL. SUCH REQUEST MUST BE MADE IN WRITING WITHIN FIVE (5) DAYS OF THIS ORDER BEING FILED.**

**MR. BRADLEY TO PREPARE A FORMAL ORDER SUBSEQUENT TO THE ISSUE OF ATTORNEY'S FEES BEING DETERMINED.**

Following that, my office submitted our affidavit of attorneys' fees, Ms. Pierce filed a response, and the Court then issued a Form 4 Order on February 26, 2025, which ordered as follows:

**DEFENDANT'S MOTION IS TREATED AS A MOTION TO CROSS EXAMINE COUNSEL ON ATTORNEY FEES. DEFENDANT'S REQUEST TO CROSS EXAMINE IS UNTIMELY AND THEREFORE DENIED. ORDER ISSUED WITHOUT A FORMAL HEARING. NO FORMAL ORDER IS REQUESTED.**

Based on these two orders, I understand that the only remaining issue is the final figure of the damages and fees awarded to Plaintiff. Would you like my office to go ahead and prepare said proposed order with the proposed/sought damages and fees outlined therein?

We are happy to provide the Court with whatever it needs in this regard, and can proceed in submitting the Formal Order contemplated by your January 31<sup>st</sup> order this week if desired.

Thank you,  
Patrick



**J. Patrick Bradley** | Attorney  
Direct 864.240.4567 | [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)  
Haynsworth Sinkler Boyd, P.A.  
ONE North Main, 2nd Floor | Greenville, SC 29601  
Main 864.240.3200 | Fax 864.240.3300

[Web](#) | [Bio](#) | [vCard](#) | [Map](#) | [Linked In](#) | [Blog](#)

**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Sent:** Wednesday, March 5, 2025 8:57 AM  
**To:** McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>; McIntosh, Lawton Law Clerk (Grace Kerley) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>; Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>; Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>; Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>  
**Subject:** Formal Order of Default Judgment 2023-CP-3700232

Judge,

I'm inquiring if there will be a formal order regarding this matter or the form 4 is treated as a final order regarding the default Judge and Damages.

If a formal order will be prepared, I need a copy of it sent to me via email for review as per SC Rule 5(b)(3) before being filed with the court.

Thank you

**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**

---

***CONFIDENTIALITY NOTICE:*** *This e-mail and any files transmitted with it are confidential and may contain information which is legally privileged or otherwise exempt from disclosure. They are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please immediately notify the sender and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.*

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**Exhibit C**

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**Feb 12 2026**

**SC Court of Appeals**

**NOTICE OF APPEAL IN A CIVIL CASE**  
**THE STATE OF SOUTH CAROLINA**

In The Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

**CIRCUIT COURT CASE NO.: 2023-CP-37-00232**

Dorothy Pierce..... Appellant.

V.

Planetone Packaging..... Respondent.

**CERTIFICATE OF SERVICE**

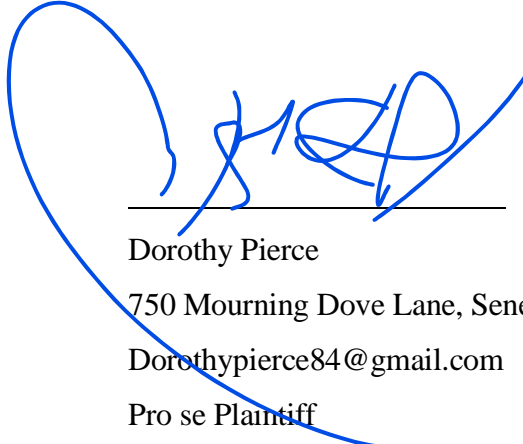
I certify that on March 12<sup>th</sup>, 2025, I served the foregoing Notice of Appeal to the respondent utilizing Electronic Service as follows:

CHRISTOPHER B. MAJOR

cmajor@hsblawfirm.com

One north main 2<sup>nd</sup> floor

Greenville South Carolina 29601



\_\_\_\_\_  
Dorothy Pierce

750 Mourning Dove Lane, Seneca, SC 29678

Dorothypierce84@gmail.com

Pro se Plaintiff

RECEIVED

Mar 13 2025

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

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Feb 12 2026

SC Court of Appeals

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

PlanetONE Packaging, LLC, .....Respondent,

v.

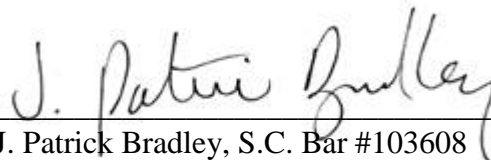
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo ..... Defendants,

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

**PROOF OF SERVICE**

I, the undersigned counsel for Respondent, do hereby certify that I have on March 13, 2025, caused *Respondent's Motion to Dismiss* to be served via U.S. Mail, on the opposing party of record, 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  
Haynsworth Sinkler Boyd, P.A.  
P.O. Box 2048  
Greenville, SC 29602  
864.240.3200  
[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

**HAYNSWORTH  
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.  
ONE NORTH MAIN STREET, 2<sup>ND</sup> FLOOR  
P.O. BOX 2048 (29602)  
GREENVILLE, SOUTH CAROLINA 29601  
MAIN 864.240.3200  
FAX 864.240.3300  
www.hsblawfirm.com

**J. PATRICK BRADLEY**  
DIRECT 864.240.4567  
pbradley@hsblawfirm.com

March 13, 2025

**VIA FIRST CLASS MAIL**

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678

**RECEIVED RECEIVED**  
**Feb 12 2026 Mar 13 2025**  
**SC Court of Appeals SC Court of Appeals**

RE: PlanetONE Packaging, LLC v. Dorothy Pierce, et. al.  
Appellate Case No. 2025-000490

Ms. Pierce:

Please find enclosed for service upon you Respondent PlanetONE Packaging, LLC's Motion to Dismiss, together with a Proof of Service for same, with regard to the above-referenced matter. This was filed with the South Carolina Court of Appeals today.

Please do not hesitate to contact me if you have any questions.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.

  
J. Patrick Bradley

Enclosures

**III. The Appeal is Frivolous and is an Attempt to Delay This Matter Further.**

Given the time and legal fees involved in responding to all of Pierce's appellate and trial court filings, PlanetONE continues to be damaged in both time spent and costs associated with Pierce's ongoing attempts to evade responsibility in the South Carolina court system. This is now her second appeal to the Court of Appeals, which failed the first time. It is clear that this is a frivolous Appeal filed only for the purposes of delay of an actual final judgment in this case as set forth above. As such, this motion should be granted and this appeal dismissed so that the circuit court may enter its long-awaited and, as shown in Exhibit B and the orders at issue, forthcoming final order of judgment against American Pharma and Pierce.

**IV. CONCLUSION AND REQUEST FOR EXPEDITED CONSIDERATION**

An appellant who fails to follow procedural requirements strips the court of appellate jurisdiction. *State v. Brown*, 358 S.C. 382, 387, 596 S.E.2d 39, 41 (2004); *Great Games, Inc. v. S.C. Dep't of Revenue*, 339 S.C. 79, 83 n. 5, 529 S.E.2d 6, 8 n. 5 (2000); *see also* Rule 260(a), SCACR (requiring dismissal of an appeal when an appellant fails to comply with the Appellate Court Rules). Given any one of the reasons set forth herein, this Court lacks jurisdiction to entertain this appeal. Accordingly, the appeal must be dismissed.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ J. Patrick Bradley

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

ONE North Main Street, 2<sup>nd</sup> Floor

P.O. Box 2048 (29602)

Greenville, SC 29601

(864) 240-3200

[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

*Attorneys for Respondent PlanetONE Packaging, LLC*

March 13, 2025  
Greenville, South Carolina

of Appeal at all—she has represented that she is simply submitting the March 24, 2025 order to “ensure the entire record” has been received by the Court.

Therefore, Respondent asks that Appellant’s motion be dismissed or denied, that Respondent’s pending motion be granted, and that the remittitur be issued consistent with Rule 221, SCACR.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ J. Patrick Bradley \_\_\_\_\_

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

ONE North Main Street, 2<sup>nd</sup> Floor

P.O. Box 2048 (29602)

Greenville, SC 29601

(864) 240-3200

[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

*Attorneys for Respondent PlanetONE Packaging, LLC*

April 3, 2025

Greenville, South Carolina

RECEIVED

Mar 13 2025

SC Court of Appeals

RECEIVED

Feb 12 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.

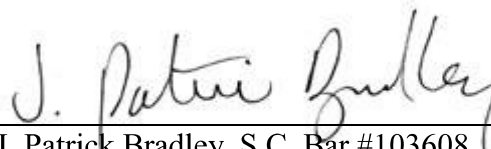
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo ..... Defendants,

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

**PROOF OF SERVICE**

I, the undersigned counsel for Respondent, do hereby certify that I have on March 13, 2025, caused *Respondent's Motion to Dismiss* to be served via U.S. Mail, on the opposing party of record, 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  
Haynsworth Sinkler Boyd, P.A.  
P.O. Box 2048  
Greenville, SC 29602  
864.240.3200  
[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

STATE OF SOUTH CAROLINA

COUNTY OF OCONEE

PlanetONE Packaging, LLC,

Plaintiff,

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.

IN THE COURT OF COMMON PLEAS

C.A. No.: 2023-CP-37-00232

**CERTIFICATE OF SERVICE**

**RECEIVED**

**Feb 12 2026**

**SC Court of Appeals**

I, the undersigned attorney for Plaintiff, PlanetONE Packaging, LLC, hereby certify that on January 31, 2025, I caused the Order filed by the Court on January 31, 2025 to be served upon Defendant Dorothy Pierce, pro se, via U.S. Mail, postage prepaid as indicated below:

Dorothy Pierce, pro se  
750 Mourning Dove Lane  
Seneca, SC 29678  
[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)

s/ Christopher B. Major  
Christopher B. Major (SC Bar No. 72872)  
ONE North Main Street, 2<sup>nd</sup> Floor (29601)  
P.O. Box 2048  
Greenville, South Carolina 29602  
(864)-240-3200  
[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

*Attorney for Plaintiff PlanetONE Packaging, LLC*

# 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

**RECEIVED**

**Feb 12 2026**

**SC Court of Appeals**

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## ORDER

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On March 12, 2025, Appellant filed a notice of appeal from circuit court orders dated January 31, 2025, and February 26, 2025. In her notice of appeal, she stated she received the orders on February 13, 2025, and March 5, 2025, respectively. Appellant provided a proof of service, stating she served her notice of appeal on March 12, 2025, "utilizing [e]lectronic service" and providing the email address and street address for Respondent. On March 13, 2025, Respondent filed a motion to dismiss the appeal, arguing (1) the orders were interlocutory and not immediately appealable, (2) Appellant failed to serve her notice of appeal, and (3) the appeal is frivolous. Appellant filed a return, opposing dismissal.

On March 24, 2025, Appellant filed a motion to amend her notice of appeal to include an order filed March 24, 2025. Respondent filed a return, opposing Appellant's motion to amend. Appellant filed a reply.

On April 15, 2025, Appellant filed a separate notice of appeal from the March 24, 2025 order, which this court assigned appellate case number 2025-000731. With this notice of appeal, Appellant also included an April 1, 2025 order addressing attorney's fees. In light of the fact that Appellant has now appealed what appears

to be the final order, we deny the pending motions in the related appeal as moot. *See* S.C. Code Ann. § 14-3-330(1) (2017) (defining appellate jurisdiction to include "[a]ny intermediate judgment, order[,] or decree in a law case involving the merits in actions commenced in the court of common pleas or general sessions, brought there by original process or removed there from any inferior court or jurisdiction, and final judgments in such actions; provided, that if no appeal be taken until final judgment is entered the court may upon appeal from such final judgment review any intermediate order or decree necessarily affected the judgment not before appealed from"); S.C. Code Ann. § 18-1-130 (2014) ("Upon an appeal from a judgment the court may review any intermediate order involving the merits and necessarily affecting the judgment."). Pursuant to Rule 214 of the South Carolina Appellate Court Rules, we consolidate appellate case number 2025-000731 and appellate case number 2025-000490. *See* Rule 214, SCACR ("Where there is more than one appeal from the same order, judgment, decision or decree, or where the same question is involved in two or more appeals in different cases, the appellate court may, in its discretion, order the appeal to be consolidated."). The parties must use appellate case number 2025-000490 for future filings.

  
\_\_\_\_\_  
FOR THE COURT

Columbia, South Carolina

**FILED**  
**May 30 2025**

cc:

Dorothy Pierce

Christopher B. Major, Esquire

John Patrick Bradley, Esquire



RECEIVED

Feb 12 2026

SC Court of Appeals

STATION A  
19 CONESTEE AVE  
GREENVILLE, SC 29604-9998  
(800)275-8777

03/25/2025

11:55 AM

| Product | Qty | Unit Price | Price |
|---------|-----|------------|-------|
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|----------------|---|--|---------|
| Priority Mail® | 1 |  | \$10.10 |
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Atlanta, GA 30339  
Flat Rate  
Expected Delivery Date  
Fri 03/28/2025  
Tracking #:  
9505 5104 2881 5084 1826 91  
Insurance \$0.00  
Up to \$100.00 included

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Flat Rate Env  
Washington, DC 20006  
Flat Rate  
Expected Delivery Date  
Fri 03/28/2025  
Tracking #:  
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Up to \$100.00 included

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Charlotte, NC 28202  
Flat Rate  
Expected Delivery Date  
Thu 03/27/2025  
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Up to \$100.00 included

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Greenville, SC 29601  
Flat Rate  
Expected Delivery Date  
Thu 03/27/2025  
Tracking #:  
9505 5104 2881 5084 1827 52  
Insurance \$0.00  
Up to \$100.00 included

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| Total |  |  | \$10.10 |
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**RECEIVED**

**Feb 12 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

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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 the .....Appellant.

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**MOTION TO DISMISS APPEAL**

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Pursuant to Rules 240 and 269, SCACR, PlanetONE Packaging, LLC (“Respondent” or “PlanetONE”) hereby moves for the dismissal<sup>1</sup> of Appellant Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Pierce” or “Appellant”) appeal (Appellate Case No. 2025-000490) on the grounds that this Appeal: (1) fails to comply with the South Carolina Appellate Court Rules, including Rules 207 (Transcript of Proceeding), 208 (Initial Briefs), 209 (Designation of Matter), 241 (Stay and Supersedeas in Civil Actions), 262 (Filing and

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<sup>1</sup> Respondent filed its first Motion to Dismiss Appeal in this matter on March 13, 2025. (See Resp. Mot. to Dismiss, Mar. 13, 2025). The Court ultimately entered an Order on May 30, 2025 that, among other things, denied Respondent’s first Motion to Dismiss “as moot” based on subsequent filings of Appellant “[i]n light of the fact that Appellant has now appealed what appears to be a final order[.]” (Ct. App. Order at p. 2, May 30, 2025).

Service), 263 (Time), 266 (Subsequent Applications for Relief), 269 (Frivolous Appeals, Petitions, Motions, or Returns); (2) Appellant failed to serve her notice(s) of appeal, various motions, and other filings before this Court as required by the Rules; (3) seeks to appeal issues not raised and ruled upon by the lower court; and (4) is frivolous. Respondent further asks that this motion be decided on an expedited basis so that Appellant may not continue to use the appellate process to prejudice Respondent and cause undue delay.

### **BACKGROUND**

The Appeal now before the Court is the most recent iteration in a series of unserved<sup>2</sup>, interlocutory, unpreserved, and frivolous attempts by Appellant to abuse the court system and evade accountability under South Carolina law.

While still slightly unclear, it appears Appellant's current appeal (the fourth before this Court) is based off two Form 4 Orders issued by the Honorable R. Lawton McIntosh on January 31, 2025 and February 26, 2025, and Judge McIntosh's March 24, 2025 Order of Default Judgement in the amount of Two-Hundred and Sixty-Two Thousand One-Hundred Thirty Dollars and Thirty-Three Cents (\$262,130.33), plus interest, in Respondent's favor entered on March 24, 2025. In the meantime, Respondent has filed a series of lis pendens to preserve its rights under the judgment (even though enforcement is available to Respondent now) out of an abundance of caution. This current appeal should be dismissed given the significant procedural and legal deficiencies upon which it is based.

Appellant continues to seek a myriad of unavailable remedies and appellate court review (various motions, including seeking supersedeas, sanctions, and review of incomprehensible, unpreserved "issues" on appeal) all to try and evade enforcement of the orders against her.

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<sup>2</sup> The issue of Appellant's consistent failure of service has already been briefed at length. In no way does PlanetONE waive any objections to service, or lack thereof.

Appellant sets forth an impressive laundry list of twenty-seven (27) “Issues on Appeal” in her latest filing in this matter. (*See* App. Initial Br. at pp. 7-9).<sup>3</sup> None of these issues are preserved for appeal as briefed, at length, in prior iterations of this motion and in response to Appellant’s various attempts to turn this appeal into a trial. Out of respect for the Court’s and parties’ time and resources, particularly given the significant record of filings and arguments presented by to date, Respondent will refrain from going through each issue again and simply asks this Court to dismiss this appeal, sanction Appellant, and provide for the orderly final remittitur and path to enforcement of the judgment in Respondent’s favor without delay.

### **LEGAL STANDARD**

An appellant who fails to follow procedural requirements strips the court of appellate jurisdiction. *State v. Brown*, 358 S.C. 382, 387, 596 S.E.2d 39, 41 (2004); *Great Games, Inc. v. S.C. Dep’t of Revenue*, 339 S.C. 79, 83 n. 5, 529 S.E.2d 6, 8 n. 5 (2000); *see also* Rule 260(a),

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<sup>3</sup> Note: on the merits, should the Court opt not to dismiss this appeal now—and in addition to the failures regarding Appellant’s unpreserved, manufactured issues—Appellant’s legal citations are fabrications that can grossly hallucinate and manipulate South Carolina case law. The “Standard of Review” for the “Initial Brief of Appellant” (Initial Brief of Appellant at pp. 21-22) alone contains fifteen (15) illusory citations to cases that have nothing to do with the Appellant’s assertions (*See Dixon v. Dixon*, 362 S.C. 388, 395, 608 S.E.2d 849, 852 (2005); *Whaley v. CSX Transp., Inc.*, 362 S.C. 568, 578, 609 S.E.2d 286, 291 (2005); *Moore v. Moore*, 376 S.C. 467, 474, 657 S.E.2d 743, 747 (2008); *Herron v. Century BMW*, 395 S.C. 461, 465–66, 719 S.E.2d 640, 642 (2011); *Floyd v. Page*, 124 S.C. 400, 403, 117 S.E. 409, 410 (1923; *Hoeffner v. The Citadel*, 311 S.C. 361, 366, 429 S.E.2d 190, 193 (1993); *Wilson v. Friedberg*, 323 S.C. 248, 252–56, 473 S.E.2d 854, 856 (1997); *Sturkie v. Sifly*, 280 S.C. 453, 457–58, 313 S.E.2d 316, 318–19 (Ct. App. 1984); *Mitchell v. Fortis Ins. Co.*, 385 S.C. 570, 585, 686 S.E.2d 176, 184 (2009); *Wright v. Craft*, 372 S.C. 1, 23–24, 640 S.E.2d 486, 498 (Ct. App. 2006); *Crary v. Djebelli*, 329 S.C. 385, 391, 496 S.E.2d 21, 24 (1998); *Raynor v. Byers*, 422 S.C. 128, 131, 810 S.E.2d 430, 432 (Ct. App. 2017); and *Palmetto Constr. Grp., LLC v. Restoration Specialists, LLC*, 444 S.C. 328, 348–49, 907 S.E.2d 129, 140 (Ct. App. 2024)). For instance, Appellant cites the *Dixon* case regarding the standards applicable to default judgments, yet *Dixon* does not address default at all, and Appellant already lost her appeal challenging the default judgment entered against her. Similarly, Appellant cites *Floyd* regarding the appellate standard for questions of law, yet the case actually deals with whether an appeal may be had after a mistrial. 124 S.C. at 409. Respondent reserves all rights regarding the filing of its Initial Brief should one be required after a ruling on dismissal.

SCACR (requiring dismissal of an appeal when an appellant fails to comply with the Appellate Court Rules).

### ARGUMENT

As noted by former Chief Justice Jean H. Toal, “[b]ecause motions are used in the appellate courts to seek specific relief, there is no limit to the type of motion that could be filed in the appellate courts.” Jean H. Toal *et al.*, *Appellate Practice in South Carolina* 379 (3d ed. 2016).

This basic breach of contract matter has dragged on for close to three years, with Appellant intent on continuing the saga. Appellant’s attempt to delay this matter by filing successive, baseless motions, appeals, amended notices of appeal, irrational briefs – without regard for service, timing, or other procedural guidelines (these issues have been addressed in many prior motions and briefs by Respondent and, reserving all rights, Responding will not belabor those points again) – should be rejected for any one of the reasons set forth herein.

With each unsuccessful appeal, Appellant drains Respondent of its time and resources while attempting to weaponize the Court and create an untenable appellate posture. Every motion and appeal attempt to date is but a clutter of delay tactics disguised as non-preserved,<sup>4</sup> non-appealable, and non-supersedeas matters. No reasonable attorney could find this series of appeals as anything but frivolous and calculated for delay only. *See* S.C. Code Ann. § 15-36-10 (A)(4)(a)(iv). A review of Appellant’s most recent “Initial Brief” makes it clear that this “appeal . . . is frivolous [and] solely for the purposes of delay,” in addition to her failure to comply with the rules of the appellate court. Dismissal, sanctions, and expedited review are appropriate. *See* Rule

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<sup>4</sup> Appellant’s laundry list of issues in this appeal all relate to the entry of default judgment that was the subject of a previous, unsuccessful appeal and petition to the South Carolina Supreme Court (*see* Appellate Case Nos. 2024-000334 (Ct. App.) and 2024-001156 (Sup. Ct.)), and are clearly not preserved here.

269, SCACR. Indeed, nothing in her brief was raised to, much less ruled upon by, the trial court. Dismissal and sanctions are appropriate.

**CONCLUSION AND REQUEST FOR EXPEDITED CONSIDERATION**

An appellant who fails to follow procedural requirements strips the court of appellate jurisdiction. *State v. Brown*, 358 S.C. 382, 387, 596 S.E.2d 39, 41 (2004); *Great Games, Inc. v. S.C. Dep't of Revenue*, 339 S.C. 79, 83 n. 5, 529 S.E.2d 6, 8 n. 5 (2000); *see also* Rule 260(a), SCACR (requiring dismissal of an appeal when an appellant fails to comply with the Appellate Court Rules). Given any one of the reasons set forth herein, this Court lacks jurisdiction to entertain this appeal due to service problems, timing defects, and the attempt to appeal unpreserved issues. Accordingly, the appeal must be dismissed and sanctions issued to deter Respondent's conduct.

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)  
ONE North Main Street, 2<sup>nd</sup> Floor  
P.O. Box 2048 (29602)  
Greenville, SC 29601  
(864) 240-3200  
[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)  
[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)

*Attorneys for Respondent PlanetONE Packaging,  
LLC*

December 2, 2025  
Greenville, South Carolina