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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 DESIGNATION OF MATTER

Respondent proposes the following be included in the Record on Appeal in addition to those matters previously designated by the Appellant (all of which should include all exhibits):

1. Amended Summons and Complaint (filed March 28, 2023);
2. Affidavit of Service of Amended Summons and Complaint on American Pharma Machinery, LLC (service effected May 9, 2023; filed May 16, 2023);
3. Affidavit of Service of Amended Summons and Complaint on Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo (service effected May 9, 2023; filed May 16, 2023);
4. PlanetONE Packaging, LLC’s Motion for Entry of Default as to All Defendants (filed June 6, 2023);
5. Order – Entry of Default Against All Defendants (entered June 20, 2023);
6. Pierce email to Oconee Clerk of Court (sent July 21, 2023) with attachments;

7. Pierce's hand-delivered Motion to Dismiss Improper Party (filed July 21, 2023);
8. Correspondence from former counsel for Dorothy Pierce, Nekedia Heath, Esq. (filed July 31, 2023);
9. Nekedia Heath, Esq. Motion to Be Relieved as Counsel for Pierce (filed October 23, 2023);
10. Pierce email to clerk of course on October 23, 2023 regarding pro se representation of herself, and no counsel for American Pharma;
11. American Pharma Machinery, LLC and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo's Motion to Set Aside Entry of Default (filed July 31, 2023);
12. PlanetONE Packaging, LLC's Motion for Default Judgment (August 17, 2023);
13. PlanetONE Packaging, LLC's Memorandum in Opposition to Defendant's Motion to Set Aside Entry of Default (August 17, 2023);
14. Hearing Cover Sheet, The Honorable R. Lawton McIntosh (October 31, 2023);
15. Order (Form 4), The Honorable R. Lawton McIntosh (entered November 6, 2023);
16. Order, The Honorable R. Lawton McIntosh (entered December 5, 2023);
17. Order (Form 4), The Honorable R. Lawton McIntosh (entered January 16, 2024);
18. Pierce's Motion to Reconsider (filed February 2, 2024);
19. Order (Form 4), The Honorable R. Lawton McIntosh (entered February 6, 2024);
20. First Notice of Appeal (filed March 19, 2024);
21. First Appeal Order Dismissing Appeal and remitting case to circuit court
22. First Appeal Order denying certiorari
23. Pierce Emails to Court and HSB regarding service and pro se representation
24. Publix Index Message Screenshot showing date of damages hearing set by court for Nov. 14, 2024;

25. Order granting Appellant's request for continuance of damages hearing
26. Public Index Message re-setting damages hearing date
27. PlanetONE's Memorandum in Support of Damages and all associated exhibits, filed January 29, 2025, ahead of damages hearing;
28. Damages Hearing Transcript, January 29, 2025.
29. Order (Form 4), The Honorable R. Lawton McIntosh (entered January 31, 2025);
30. PlanetONE's Affidavit of Attorneys' Fees (Filed January 31, 2025);
31. Order (Form 4), The Honorable R. Lawton McIntosh (entered February 26, 2025);
32. Order (Form 4), The Honorable R. Lawton McIntosh (entered March 24, 2025);
33. Order of Default Judgment, The Honorable R. Lawton McIntosh (March 24, 2025);
34. Appellant's Second Notice of Appeal (March 12, 2025)
35. Appellant's email with notice of appeal attached
36. Appellant's Third Notice of Appeal in former Appellant Case No., 2025-000731.
37. August 21, 2023 Hearing Cover Sheet.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Christopher B. Major

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J. Patrick Bradley (SC Bar No. 103608)

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April 30, 2026
Greenville, South Carolina