

RECEIVED

May 18 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE 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
Lower Court Case No. 2023-CP-37-00232

MOTION TO ALLOW LATE FILING OF APPELLANT'S REPLY BRIEF

Appellant Dorothy Pierce, appearing pro se, respectfully moves this Court for an Order allowing the late filing of Appellant's Reply Brief. In support of this motion, Appellant states:

1. Appellant received Respondent's Brief on May 12, 2026.
2. Appellant prepared and filed her Reply Brief on May 18, 2026, within six (6) days of receipt. Appellant therefore acted promptly and within the time calculated from actual receipt of Respondent's mailed Brief.
3. On the date of filing, the Court issued a deficiency notice directing Appellant to file a motion to allow the late filing. Appellant hereby submits this motion in compliance with the Court's notice.
4. Appellant recently moved to Uganda and no longer resides at 750 Mourning Dove Lane. Because Respondent has rejected email service, Appellant must rely on mailed service. Mail sent to Appellant's former South Carolina address must first be received by the current occupant and then forwarded to Appellant abroad, which creates delay outside Appellant's control. Appellant has therefore filed a Notice of Change of Address to prevent future delay or confusion.
5. Any delay was inadvertent and not the result of willful disregard of this Court's rules.
6. Respondent will suffer no prejudice because Respondent has already filed its brief and the Reply Brief addresses matters raised in Respondent's Initial Brief.

WHEREFORE, Appellant respectfully requests that this Court permit the late filing of Appellant's Reply Brief and accept the filing as submitted.

Respectfully submitted THIS May 18, 2026



Dorothy Pierce, Appellant, Pro Se
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PROOF OF SERVICE

I certify that on May 18, 2026, I served a true and correct copy of the foregoing Motion to Allow Late Filing of Appellant's Reply Brief upon counsel for Respondent by United States Mail and courtesy email addressed as follows:

Christopher B. Major
J. Patrick Bradley
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, SC 29602-2048

Respectfully submitted,



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