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Jul 17 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.

RESPONDENT’S RETURN TO APPELLANT’S MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240(e), SCACR, Respondent PlanetONE Packaging, LLC (“Respondent”) hereby submits this Return in opposition to Appellant Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo’s (“Appellant”) Motion for Extension of Time (“Motion”). On July 7, 2026, it appears that Appellant emailed the Motion to the Court—without copy to Respondent’s counsel—seeking a thirty-day extension “to file the proof of service of the record on appeal.” (*See* App. Email to Clerk, July 7, 2026). Appellant’s instant Motion and ex parte email was discovered by Respondent this week only after manual review of C-Track, not by service or courtesy copy. Respondent then received a physical copy a few days later.¹

¹ Service occurred via mail on July 15, 2026, 8 days after filing. The envelope is not postmarked, but the return address is listed as 750 Mourning Dove Lane in Seneca (same address before she, ostensibly, returned to Uganda).

Appellant's Motion seeks more than just an extension of the Court's deadline for Appellant to prove that she appropriately served the record on appeal as required by the South Carolina Appellate Court Rules. (*See* Order, June 8, 2026, at p. 2) ("Within thirty (30) days of the date of this order, Appellant must file the proof of service of the record on appeal."). Indeed, Appellant's Motion:

(1) requests "a thirty (30) day extension of time, up to and including August 8, 2026, to file the proof of service of the record on appeal"; and

(2) declares that she "is diligently preparing the record on appeal and requires additional time to complete international printing and service logistics from Kampala, Uganda."

(*See* Motion, July 7, 2026, at p. 1). Accordingly, Appellant not only seeks an extension to file the proof of service of the record on appeal as Ordered by this Court, she also seeks additional time to "prepar[e]" and "serv[e]" the record on appeal itself. (*Id.*).

Appellant's Motion should be denied as she has failed to show: (1) that she served the Record on Appeal as required by the Order; and (2) good cause for why she needs more time to file the proof of service of the same.

Furthermore, Appellant has admitted she has not tried to serve the Record as required by the Rules because *she has not even prepared it yet*. (*Id.*). Rule 210(b), SCACR requires Appellant to "file the Record on Appeal with the clerk of the appellate court no later than the date [her] brief(s) are due under Rule 211." Rule 210(a) requires Appellant to "serve a copy of the Record on Appeal on each party who has served a brief" with proof of service to be "immediately filed with the" Court. She has done neither and now seeks, without explanation, basis in the rules, or for any other legitimate purpose, an extension of time to do both.

Further, the Motion has no purpose but delay, again reinforcing the frivolousness of this appeal. *See* Rule 269, SCACR ("Where an appeal . . . [or] motion . . . is frivolous or taken solely for the purposes of delay, . . . the appellate court may . . . impose upon offending . . . parties such sanctions as the circumstances of the case and discouragement of like conduct in the future may require.").

Given the above, in addition to all previously-briefed grounds for dismissal, and considering the instant Motion is yet another example of Appellant’s unending, improper delay tactics, Appellant has failed to comply with the South Carolina Appellate Court Rules—this time with respect to the filing and service of the Record on Appeal and lacking any legitimate basis for needing more time to comply. Accordingly, Respondent respectfully requests this Court “issue an order of dismissal” pursuant to Rule 260(a), SCACR.

In sum, 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/ J. Patrick Bradley

Christopher B. Major (SC Bar No. 72872)

J. Patrick Bradley (SC Bar No. 103608)

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Attorneys for Respondent PlanetONE Packaging, LLC

July 17, 2026
Greenville, South Carolina

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PlanetONE Packaging, LLC,Respondent,

v.

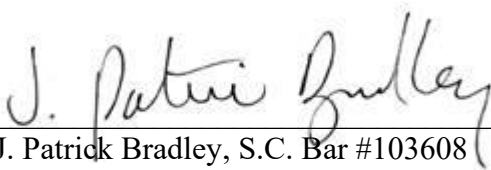
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo Defendants,

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

PROOF OF SERVICE

I, the undersigned counsel for Respondent, do hereby certify that I have on July 17, 2026, caused *Respondent's Return to Appellant's Motion for Extension of Time* 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
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
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**HAYNSWORTH
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SC Court of Appeals

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July 17, 2026

VIA FIRST CLASS MAIL

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

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 Return to Appellant's Motion for Extension of Time (filed July 7, 2026); 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