

RECEIVED

Jul 27 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

**REPLY TO RESPONDENT’S RETURN TO APPELLANT’S MOTION TO EXTEND DEADLINE TO FILE
RECORD ON APPEAL.**

Appellant Dorothy Pierce (“Appellant”), proceeding without counsel, respectfully submits this Reply pursuant to Rule 240(f), SCACR.

Respondent has sought extensions of time in this appeal on more than one occasion, and its requests were granted by this Court. Yet Respondent now takes the draconian position that Appellant should not be permitted to seek similar procedural relief and that Appellant should be punished with dismissal, sanctions, and attorney’s fees merely for requesting additional time through the proper judicial process.

Respondent’s position is inconsistent and inequitable. Appellant did not purport to extend her own deadline. She filed a Motion before expiration of the deadline and asked this Court to exercise the authority expressly granted to it under Rule 263(b), SCACR. Seeking relief authorized by the Appellate Court Rules is not misconduct, frivolous conduct, or evidence that an appeal was taken solely for delay.

I. THE MOTION PROPERLY REQUESTED ADDITIONAL TIME

The Court required Appellant to file proof of service of the Record by July 8, 2026. Appellant first had to complete, print, and serve the Record before filing that proof.

Appellant therefore requested additional time to complete the Record and arrange international printing and service from Uganda. Rule 263(b), SCACR, authorizes the Court to extend these deadlines.

II. THE MOTION WAS TIMELY

Appellant filed the Motion on July 7, 2026, before the July 8 deadline, and requested a limited extension through August 8, 2026.

The Record contained hundreds of pages, required substantial preparation, and had to be printed and served internationally. Appellant was also addressing another appellate deadline due July 8. These circumstances established good cause.

.III. THE FILING EMAIL WAS NOT AN IMPROPER EX PARTE COMMUNICATION

Appellant properly filed her Motion by email with the Court. She was not required to copy Respondent's counsel on the filing email as a courtesy, particularly because Respondent had previously rejected that courtesy. Appellant separately served Respondent by U.S. Mail as permitted by Rule 262(c), SCACR. Therefore, the filing email was not an improper ex parte communication.

IV. RESPONDENT INCORRECTLY IDENTIFIES THE SERVICE DATE

Respondent received the Motion on July 15, 2026, but service occurred earlier. Under Rule 262(c)(2), SCACR, service by mail is complete upon mailing, not receipt. Appellant submitted the Motion to Postal Methods on July 7, and it was processed on July 8. Respondent timely responded and suffered no prejudice.

V. APPELLANT COMPLETED THE RECORD

Appellant requested additional time to complete and serve a substantial Record from Uganda. The Record is now complete and has been electronically filed. A bound paper copy is being served upon Respondent, after which proof of service will be filed.

VI. DISMISSAL AND SANCTIONS ARE UNWARRANTED

Appellant requested relief authorized by Rule 263(b) before the deadline expired and has now completed the Record. The Motion was neither frivolous nor filed for delay. Respondent's requests for dismissal, sanctions, and attorney's fees should be denied.

PRAYER FOR RELIEF

For the foregoing reasons, Appellant respectfully requests that this Court:

1. Grant Appellant's Motion for Extension of Time through August 8, 2026;
2. Deny Respondent's Requests as contained in their Return to Appellant's Motion.
3. Grant such other relief as the Court considers just and proper.

Respectfully submitted, this July 27, 2026



Dorothy Pierce, Appellant, Pro Se
P.O. Box 209910, Kampala GPO
Kampala, Uganda
Email: dorotheypierce84@gmail.com

RECEIVED

Jul 27 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

PROOF OF SERVICE

I certify that on July 27, 2026, I served a true and correct copy of the foregoing **Reply To Respondent's Return To Appellant's Motion To Extend Deadline To File Record On Appeal.** upon counsel for Respondent by United States Mail addressed as follows:

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

Respectfully submitted,



Dorothy Pierce, Appellant, Pro Se
P.O. Box 209910, Kampala GPO
Kampala, Uganda
Email: dorotheypierce84@gmail.com