

RECEIVED

Aug 18 2026

SC Court of Appeals



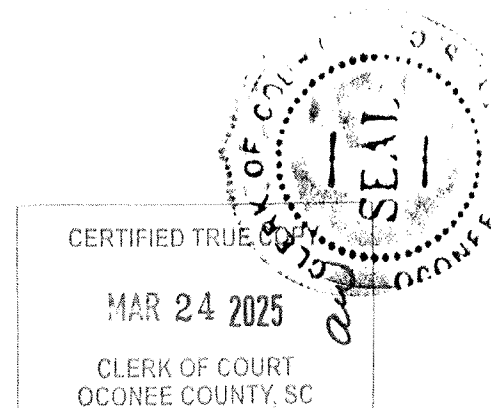
Oconee Common Pleas

Case Caption: Planetone Packaging Llc VS American Pharma Machinery Llc ,
defendant, et al
Case Number: 2023CP3700232
Type: Order/Judgment by Default and Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-03-24 11:43:54 page 6 of 6



R. 0330

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

ORDER OF DEFAULT JUDGMENT

RECEIVED
Apr 15 2025
SC Court of Appeals

Based on the facts set forth in the Affidavit of Default, the undisputed facts set forth in Plaintiff's Amended Complaint, Plaintiff's Motion for Default Judgment as to All Defendants (filed August 17, 2023), Plaintiff's Memorandum in Support of Plaintiff's Damages for January 29, 2025 Damages Hearing (filed January 29, 2025), arguments of counsel and testimony of witness(es) at the January 29, 2025 Damages Hearing, Plaintiff's Affidavit of Attorney's Fees (filed January 31, 2025), and all other filings and facts on record in this matter, it appears to this Court that Defendants American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo (collectively "Defendants") are in default and that Plaintiff is entitled to judgment against Defendants, jointly and severally, for the damages and relief sought in the Amended Complaint.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that Defendants are in default.

IT IS FURTHER ORDERED that based on the evidence, pleadings, arguments of counsel, documents on file with the Court, and witness testimony, I find and conclude that Plaintiff is entitled to an award of the following against Defendants, jointly and severally:

- Actual damages in the amount of Seventy-Four Thousand Seven Hundred and Eighty-Eight Dollars (\$74,788.00), trebled under the South Carolina Unfair Trade Practices Act, for a total of Two Hundred and Twenty-Four Thousand, Three-Hundred and Sixty-Four Dollars (\$224,364.00), plus interest at the judgment rate from the date of this Order until paid in full; and
- Reasonable attorneys' fees and costs of Plaintiff, totaling Thirty-Seven Thousand Seven Hundred and Sixty-Six Dollars and Thirty-Three Cents (\$37,766.33), plus interest at the judgment rate from the date of this Order until paid in full.

For a total judgment amount of **Two-Hundred and Sixty-Two Thousand One-Hundred Thirty Dollars and Thirty-Three Cents (\$262,130.33)**, plus interest from the date of this Order at the judgment rate until paid in full.

IT IS SO ORDERED.

The Honorable R. Lawton McIntosh
Tenth Judicial Circuit

_____, 2025
Oconee, South Carolina



Oconee Common Pleas

Case Caption: Planetone Packaging Llc VS American Pharma Machinery Llc ,
defendant, et al
Case Number: 2023CP3700232
Type: Order/Judgment by Default and Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-03-24 11:44:05 page 3 of 3

ELECTRONICALLY FILED - 2025 Mar 24 11:47 AM - OCONEE - COMMON PLEAS - CASE#2023CP3700232

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

ORDER OF DEFAULT JUDGMENT

RECEIVED

Mar 24 2025

SC Court of Appeals

Based on the facts set forth in the Affidavit of Default, the undisputed facts set forth in Plaintiff's Amended Complaint, Plaintiff's Motion for Default Judgment as to All Defendants (filed August 17, 2023), Plaintiff's Memorandum in Support of Plaintiff's Damages for January 29, 2025 Damages Hearing (filed January 29, 2025), arguments of counsel and testimony of witness(es) at the January 29, 2025 Damages Hearing, Plaintiff's Affidavit of Attorney's Fees (filed January 31, 2025), and all other filings and facts on record in this matter, it appears to this Court that Defendants American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo (collectively "Defendants") are in default and that Plaintiff is entitled to judgment against Defendants, jointly and severally, for the damages and relief sought in the Amended Complaint.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that Defendants are in default.

IT IS FURTHER ORDERED that based on the evidence, pleadings, arguments of counsel, documents on file with the Court, and witness testimony, I find and conclude that Plaintiff is entitled to an award of the following against Defendants, jointly and severally:

- Actual damages in the amount of Seventy-Four Thousand Seven Hundred and Eighty-Eight Dollars (\$74,788.00), trebled under the South Carolina Unfair Trade Practices Act, for a total of Two Hundred and Twenty-Four Thousand, Three-Hundred and Sixty-Four Dollars (\$224,364.00), plus interest at the judgment rate from the date of this Order until paid in full; and
- Reasonable attorneys' fees and costs of Plaintiff, totaling Thirty-Seven Thousand Seven Hundred and Sixty-Six Dollars and Thirty-Three Cents (\$37,766.33), plus interest at the judgment rate from the date of this Order until paid in full.

For a total judgment amount of **Two-Hundred and Sixty-Two Thousand One-Hundred Thirty Dollars and Thirty-Three Cents (\$262,130.33)**, plus interest from the date of this Order at the judgment rate until paid in full.

IT IS SO ORDERED.

The Honorable R. Lawton McIntosh
Tenth Judicial Circuit

_____, 2025
Oconee, South Carolina



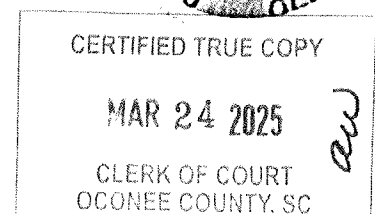
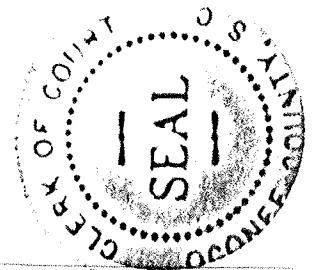
Oconee Common Pleas

Case Caption: Planetone Packaging Llc VS American Pharma Machinery Llc ,
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Case Number: 2023CP3700232
Type: Order/Judgment by Default and Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-03-24 11:44:05 page 3 of 3



R. 0336

FORM 4

**STATE OF SOUTH CAROLINA
COUNTY OF OCONEE
IN THE COURT OF COMMON PLEAS**

JUDGMENT IN A CIVIL CASE

CASE NO. 2023CP3700232

Planetone Packaging LLC
PLAINTIFF(S)

American Pharma Machinery LLC et al
DEFENDANT(S)

Submitted by: R. Lawton McIntosh

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

ORDER INFORMATION

PLAINTIFF IS AWARDED \$1,000 IN ATTORNEY'S FEES (SEE SOUTH CAROLINA COURT OF APPEALS ORDER DATED 11/25/2024). ONLY FORM 4 REQUESTED.

This order ☐ ends ☒ does not end the case.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

RECEIVED
Apr 15 2025
SC Court of Appeals

Page 2 of 4
R. 0338



Oconee Common Pleas

Case Caption: Planetone Packaging Llc VS American Pharma Machinery Llc ,
defendant, et al
Case Number: 2023CP3700232
Type: Order/Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2025-03-31 15:52:25 page 3 of 3

ELECTRONICALLY FILED - 2025 Apr 01 9:11 AM - OCONEE - COMMON PLEAS - CASE#2023CP3700232



AFFIDAVIT OF SERVICE

ELECTRONICALLY FILED - 2023 May 16 11:28 AM - OCONEE - COMMON PLEAS - CASE#2023CP-0232

PlanetONE Packaging, LLC

Case No. 2023-CP-37-00232

(Plaintiff)

VS

Court Common Pleas Oconee County

American Pharma Machinery, LLC and Dorothy Pierce aka Dorothy Wells, AKA Dorothy Aleweny aka Queen Dorothy Amolo

(Defendant)

Personally appeared before me the undersigned, who being duly sworn, deposes and states that he/she served a copy of the following: Amended Summons, Amended Complaint, Exhibit A

UPON American Pharma Machinery, LLC c/o Registered Agent ICAMED

delivering to him/her a copy of the same at 16 Ashwood Ave, Greenville SC 29607

On the 9th day of May 2023 at 7:37 pm am/pm, and that the above papers were served in compliance with all state and local laws.

MANNER OF SERVICE-

XXX Personal: By personally delivering copies to the person being served.

Substituted at Residence: By leaving copies at the dwelling house or usual place of abode of the person being served with a member of the household of suitable age and explaining the general nature of the papers

Substituted at Business: By leaving, during office hours, copies at the office of the person/entity being served with the person apparently in charge thereof

Non-Service: After due search, careful inquiry and diligent attempts at the address(es) listed below, I have been unable to effect process upon the person/entity being served because of the following reason(s): attempted at 709 Mourning Dove Lane Seneca SC 29678 and 750 Mourning Dove Lane Seneca SC this is a large property with a gate and padlock. Spoke to neighbors and they said Dorothy Pierce is staying in Greenville, SC

SWORN to before me this

15 day of May 2023

Charles F. Proietta

Notary Public for SC

My Commission Expires 7-22-32

(process server) Ashleigh Andrews

code HSB/K Bailey

Archived: Monday, August 17, 2026 11:17:37 AM
From: Dorothy Pierce
Mail received time: Fri, 21 Jul 2023 09:09:10
Sent: Thu, 20 Jul 2023 23:34:17
To: Amanda Watkins
Subject: 2023-CP-37-00232
Importance: Normal
Sensitivity: None
Attachments: Motion to dismiss- June 01-2023-CP-37-00232. signed.pdf 

Good evening Amanda,

I received the amended complaint from Plaintiff Planetone on May 09 2023 however I left for Uganda shortly after that due to the death of my friend.

While in Uganda, On June 01, 2023, I mailed a motion to dismiss to the court through the Uganda Post Office. I would like to know if the motion was delivered and properly filed.

I have attached a copy herein.

Thanks,

Dorothy Pierce

STATE OF SOUTH CAROLINA

COUNTY OF OCONEE

PLANETONE PACKAGING

Plaintiff.

vs.

AMERICAN PHARMA MACHINERY, LLC.
, DOROTHY PIERCE

Defendants.

IN THE COURT OF COMMON PLEAS

TENTH JUDICIAL CIRCUIT

CASE NO.: 2023-CP-37-00232

DEFENDANT DOROTHY PIERCE'S
MOTION TO DISMISS IMPROPER PARTY

COMES NOW defendant Dorothy Pierce (herein "the defendant) and respectfully files this motion to dismiss the plaintiff's amended complaint. Defendant states as follows:

FACTUAL BACKGROUND

1. In early May, Defendant Dorothy Pierce had to travel to Uganda due to the death of her dearest friend, Col. Charles Okello Engola Macodwogo ,the former State Minister for Labor, Employment, and Industrial Relations in the Government of Uganda. He was shot and killed by his bodyguard on May 2, 2023.
2. A few days before leaving for Uganda, on May 9, 2023, Plaintiff served the defendant with a copy of the amended complaint.
3. Defendant therefore files this motion to dismiss Plaintiff's Amended Complaint for improper party.

ARGUMENT AND MEMORANDUM OF LAW IN SUPPORT

Defendant Dorothy Pierce is not responsible for the torts committed while acting in furtherance of the company's business.

4. The contract in question was entered into by Plaintiff and American Pharma Machinery LLC, a limited liability company organized and registered under the laws of South Carolina. The plaintiff is suing the wrong party. Under a limited liability company, the member of the company acting on behalf of the company is not responsible for the liability of the company. Section 33-44-303 of the South Carolina Code (2006), states that:
 - a) Except as otherwise provided in subsection (c), the debts, obligations, and liabilities of a limited liability company, whether arising in contract, tort, or otherwise, are solely the debts, obligations, and liabilities of the company. A member or manager is not personally liable for a debt, obligation, or liability of the company solely by reason of being or acting as a member or manager.
 - b) The failure of a limited liability company to observe the usual company formalities or requirements relating to the exercise of its company powers or management of its business is not a ground for imposing personal liability on the members or managers for liabilities of the company.

In *16 Jade St., LLC v. R. Design Const. Co., LLC*, 405 S.C. 384, 747 S.E.2d 770 (2013), the Court withdrew its prior ruling that Carl R. Aten, Jr., a member of R. Design Construction Co., LLC, could be held personally liable for the torts committed by Aten in furtherance of the R. Design's business. This case presents the novel question of whether a member of a limited liability company can be held personally liable for torts committed while acting in furtherance of the company's business. In the Court's revised ruling, the Court answered the questions:

- i. Did the circuit court err in finding Aten can be held personally liable for negligent acts he committed while working for an LLC of which he was a member?

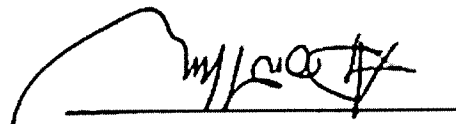
- ii. Did the circuit court err in not finding Catterson personally liable for the tortious acts of Catterson & Sons?

The Court found that Aten owed no duty to Plaintiff and "therefore [found] it unnecessary to reach the novel issue of whether the LLC Act absolves an LLC member of personal liability for negligence committed while acting in furtherance of the company business." 16 Jade St., LLC (2013), at 390, 773. The Court also affirmed its prior ruling that Michael S. Catterson was not personally liable for the actions of Catterson & Sons, a corporation. *Id.*, at 390, 774.

5. In this instant case, defendant Dorothy Pierce is not liable for the torts of American Pharma Machinery, LLC for she acted on behalf of the company and not on her own behalf. Plaintiff had business contractual interest with the company not defendant Dorothy Pierce.

For all of these reasons, the Plaintiff's complaint against the defendant should be dismissed with Prejudice.

Submitted this, June 01, 2023

A handwritten signature in black ink, appearing to read 'Dorothy Pierce', is written over a horizontal line. A large, loopy flourish extends from the left side of the signature, curving around the text below.

Dorothy Pierce

750 Mourning Dove Lane, Seneca, SC 29678

Dorothypierce84@gmail.com

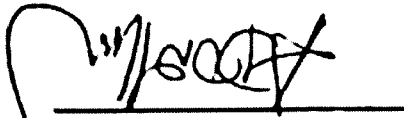
Pro se Plaintiff

CERTIFICATE OF SERVICE

I certify that on this June 01, 2023, I served the foregoing motion to dismiss to the plaintiff utilizing First-Class US Certified Mail, with appropriate postage thereon, upon all parties of record, as follows:

CHRISTOPHER B. MAJOR

One north main 2nd floor
Greenville South Carolina 29601

A handwritten signature in black ink, appearing to read 'Dorothy Pierce', is written over a horizontal line.

Dorothy Pierce

150 Mourning Dove Lane, Seneca, SC 29678

Dorothypierce84@gmail.com

Pro se Plaintiff

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

**MOTION FOR DEFAULT JUDGMENT
TO ALL DEFENDANTS**

(Request for Hearing)

YOU WILL PLEASE TAKE NOTICE that the Plaintiff, PlanetONE Packaging, LLC (hereinafter "Plaintiff"), hereby moves this Court pursuant to Rule 55(b) of the *South Carolina Rules of Civil Procedure* for judgment by default against Defendants American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo (hereinafter collectively "Defendants"), and requests a hearing be set to finalize the total judgment against Defendants.

The grounds for this motion are as follows:

1. Plaintiff filed its Amended Summons and Complaint on March 28, 2023. As alleged in that pleading, and as shown in the exhibit to the complaint, Plaintiff paid Defendants \$22,788.00 for an APM-4D automatic capsule counting machine (hereinafter the "Machine"), Defendants engaged in fraudulent, unfair, and unlawful acts concerning this transaction and in its dealings with Plaintiff, and Plaintiff is entitled to a recovery of damages from Defendants of the monies it paid defendant, the damages it has suffered because of Defendants, the costs and legal fees it has

and will be forced to expend in this matter, and for all treble, punitive, and other damages as alleged and as permitted by state law.

2. Defendants were duly served with a filed copy of the Plaintiff's Amended Summons and Complaint pursuant to the *South Carolina Rules of Civil Procedure* on May 9, 2023 via personal service. The Proofs of Service evidencing the same were filed with this Court on May 16, 2023.

3. After more than thirty (30) days elapsed from the aforementioned service of the Amended Summons and Complaint on Defendants, and because Defendants failed, as required by the *South Carolina Rules of Civil Procedure*, to serve or file any pleading, answer the claims asserted in this action, defend against the claims asserted in this action, or otherwise make an appearance in this action within that timeframe, Plaintiff filed a motion for entry of default against Defendants on June 9, 2023.

4. On June 20, 2023, the Clerk of Court entered default against Defendants pursuant to Rule 55(a), SCRPC.

5. On July 20, 2023, Defendant Pierce emailed the undersigned counsel, the Chief Deputy Clerk of Common Pleas, and several personnel from the chambers of the Honorable Scott R. Sprouse admitting that she received the Amended Complaint on May 9, 2023 and claiming that she had mailed a motion to dismiss on June 1, 2023 from "the Uganda Post Office." A pdf of the purported motion, with no proof of mailing, was attached to the email. No such motion was received by the undersigned or apparently by the Court prior to the email, as no such filing had been docketed by the Court at that time. The certificate of service included in the purported motion contains an address in Seneca, South Carolina and represents that it was served "First-Class US Certified Mail" (emphasis added), which contradicts the assertion that Defendant Pierce made in

the email regarding having mailed the filing from Uganda. On July 21, 2023 the motion to dismiss was docketed by the Court.

6. A motion to set aside default was filed by counsel for Defendant Pierce on July 31, 2023. A hearing on this and the motion to dismiss is set for August 21, 2023.

7. Accordingly, Plaintiff requests this Court hold a hearing, pursuant to Rule 55(b)(1)-(3), SCRCF to determine the amount of Plaintiff's recovery of all damages against Defendants as alleged in the Amended Complaint, as well as all costs and attorneys' fees and treble damages associated with this matter and then issue an Order awarding those damages.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Christopher B. Major

Christopher B. Major (SC Bar No. 72872)
ONE North Main Street, 2nd Floor (29601)
P.O. Box 2048
Greenville, South Carolina 29602
(864)-240-3200
cmajor@hsblawfirm.com

Attorney for Plaintiff PlanetONE Packaging, LLC

August 17, 2023

Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
COUNTY OF OCONEE

Planetone Packaging Llc

v.

American Pharma Machinery Llc et al,
DEFENDANT.

IN THE COURT OF COMMON PLEAS

Warrant No.: 2023CP3700232

**MOTION TO BE RELIEVED AS
COUNSEL**

COMES NOW the defendant, American Pharma Machinery, Llc and Dorothy Pierce, by
and through his undersigned counsel, moves this Court for an Order relieving counsel for the
foregoing reasons:

1. The Defendant consents; and
2. The Rules of Professional Conduct require so.

Respectfully Submitted,

Nekedia Heath
Nekedia Heath, Esq.
Bar No. 104977
Heath Law
P.O. Box 16043
Greenville, 29606
(864) 214-3132

October 23, 2023
Greenville, SC

Archived: Monday, August 17, 2026 11:17:40 AM
From: [Major, Chris](#)
Mail received time: Fri, 21 Jul 2023 09:31:05
Sent: Fri, 21 Jul 2023 09:31:04
To: [Amanda Watkins](#)
Cc: [Sprouse, R. Scott Law Clerk \(Perry Rupert\)](#)
Subject: RE: 2023-CP-37-00232
Importance: Normal
Sensitivity: None

All,

I would object to treating the motion as timely. There is a presumption that mail deposited in the United States mail system was delivered, but I do not believe the presumption would apply outside the United States. Moreover, there has been no evidence offered that the motion was actually mailed such as a pdf of the stamped envelope. The motion is inconsistent on that point, as the certificate of service has a Seneca address, which is inconsistent with the claim that it was signed and mailed from Uganda.



Christopher B. Major | Attorney
Direct 864.240.3211 | cmajor@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: Amanda Watkins <awatkins@oconeesc.com>
Sent: Friday, July 21, 2023 9:29 AM
To: Dorothy Pierce <dorothypierce84@gmail.com>
Cc: Major, Chris <cmajor@hsblawfirm.com>; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>; Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprousesec@sccourts.org>
Subject: RE: 2023-CP-37-00232

Please have a motion/order cover sheet along with the \$25 filing fee when submitting your motion. Thank you.

Amanda Watkins
Chief Deputy Clerk of Common Pleas
Oconee County Clerk of Court
205 W Main St.
PO Box 678
Walhalla, SC 29691
(864)916-7303 fax (864)638-4282
awatkins@oconeesc.com

CONFIDENTIALITY NOTICE: All e-mail correspondence to and from this address may be subject to public disclosure under the

South Carolina Freedom of Information Act (FOIA).

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential, proprietary, and/or privileged information protected by law. If you are not the intended recipient, you may not read, use, copy, or distribute this e-mail message or its attachments. If you believe you have received this e-mail message in error, please contact the sender by reply e-mail or telephone immediately and destroy all copies of the original message.

From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Friday, July 21, 2023 9:18 AM

To: Amanda Watkins <awatkins@oconeesc.com>

Cc: cmajor@hsblawfirm.com; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>; Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprousesec@sccourts.org>

Subject: Re: 2023-CP-37-00232

Thank you. I will bring a copy momentarily.

On Fri, Jul 21, 2023, 9:17 AM Amanda Watkins <awatkins@oconeesc.com> wrote:

Good morning Dorothy,

The Clerk's records do not show that we received this motion filing.

Respectfully,

Amanda Watkins
Chief Deputy Clerk of Common Pleas
Oconee County Clerk of Court
205 W Main St.
PO Box 678
Walhalla, SC 29691
(864)916-7303 fax (864)638-4282
awatkins@oconeesc.com

CONFIDENTIALITY NOTICE: All e-mail correspondence to and from this address may be subject to public disclosure under the South Carolina Freedom of Information Act (FOIA).

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential, proprietary, and/or privileged information protected by law. If you are not the intended recipient, you may not read, use, copy, or distribute this e-mail message or its attachments. If you believe you have received this e-mail message in error, please contact the sender by reply e-mail or telephone immediately and destroy all copies of the original message.

From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Thursday, July 20, 2023 7:34 PM

To: Amanda Watkins <awatkins@oconeesc.com>; cmajor@hsblawfirm.com; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>; Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprousesec@sccourts.org>

Subject: 2023-CP-37-00232

Good evening Amanda,

I received the amended complaint from Plaintiff Planetone on May 09 2023 however I left for Uganda shortly after that due to the death of my friend.

R. 0351

While in Uganda, On June 01, 2023, I mailed a motion to dismiss to the court through the Uganda Post Office. I would like to know if the motion was delivered and properly filed.

I have attached a copy herein.

Thanks,

Dorothy Pierce

Archived: Monday, August 17, 2026 11:16:49 AM
From: [Dorothy Pierce](#)
Mail received time: Fri, 21 Jul 2023 12:26:38
Sent: Fri, 21 Jul 2023 16:26:03
To: [Major, Chris](#)
Cc: [Amanda Watkins](#)
Subject: Re: 2023-CP-37-00232
Importance: Normal
Sensitivity: None
Attachments: [image001.gif](#) 

Major,

I will provide each and every piece of evidence in my custody.

I understand that you do not understand the international mailing system but Uganda post office is a government agency that offers all US postal services.

Just so you know, you are not getting away with anything under my watch.

You can't file a frivolous lawsuit against improper party and hope to get away with it.

Regards,

Dorothy

On Fri, Jul 21, 2023, 11:40 AM Major, Chris <cmajor@hsblawfirm.com> wrote:

All,

I apologize for continuing this dialogue, but I feel I must respond to Ms. Pierce's baseless allegations of fraud. Ms. Pierce seems to be unaware of the distinction between an entry of default and a default judgment. There has been an entry of default entered consistent with the Rules of Civil Procedure. There has not yet been a default judgment entered.

I would also note that the purported "certificate of service" contradicts Ms. Pierce's claim that a motion to dismiss was mailed from Uganda, since the certificate of service represents on its face that the motion was served via "First-Class US Certified Mail" (emphasis added). Ms. Pierce should be able to provide the signature card if service was effectuated as she represents in the document attached to her email.



Christopher B. Major | Attorney
Direct 864.240.3211 | cmajor@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>

Sent: Friday, July 21, 2023 11:24 AM

To: Major, Chris <cmajor@hsblawfirm.com>

Cc: Amanda Watkins <awatkins@oconeesc.com>; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>;
Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprousesec@sccourts.org>

Subject: Re: 2023-CP-37-00232

I disagree in totality.

I left the country temporarily and a return address would only be the Seneca address, not the Ugandan address.

The Court knew that I was out of the country.

Besides, I was not notified of any motion or hearing for a default judgment.

The plaintiff has definitely procured a default judgment fraudulently if any.

I will proceed with filing a motion to dismiss the case.

Thanks,

Dorothy

On Fri, Jul 21, 2023, 9:49 AM Major, Chris <cmajor@hsblawfirm.com> wrote:

All,

I should have also noted in my prior email that a default has already been entered against both Defendants in this matter. So I would submit that the only proper vehicle at this time for relief is a motion to set aside the entry of default.

Haynsworth Sinkler Boyd P.A.

Christopher B. Major | Attorney
Direct 864.240.3211 | cmajor@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: Amanda Watkins <awatkins@oconeesc.com>

Sent: Friday, July 21, 2023 9:29 AM

To: Dorothy Pierce <dorothypierce84@gmail.com>

Cc: Major, Chris <cmajor@hsblawfirm.com>; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>;
Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprousesec@sccourts.org>

Subject: RE: 2023-CP-37-00232

Please have a motion/order cover sheet along with the \$25 filing fee when submitting your motion. Thank you.

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Friday, July 21, 2023 9:18 AM

To: Amanda Watkins <awatkins@oconeesc.com>

Cc: cmajor@hsblawfirm.com; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprouselc@sccourts.org>; Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprouseesc@sccourts.org>

Subject: Re: 2023-CP-37-00232

Thank you. I will bring a copy momentarily.

On Fri, Jul 21, 2023, 9:17 AM Amanda Watkins <awatkins@oconeesc.com> wrote:

Good morning Dorothy,

The Clerk's records do not show that we received this motion filing.

Respectfully,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: Dorothy Pierce <dorothypierce84@gmail.com>

Sent: Thursday, July 20, 2023 7:34 PM

To: Amanda Watkins <awatkins@oconeesc.com>; cmajor@hsblawfirm.com; Sprouse, R. Scott Law Clerk (Perry Rupert) <rssprousele@sccourts.org>; Sprouse, R. Scott Secretary (Katherine R. Hattenstein) <rssprouseesc@sccourts.org>

Subject: 2023-CP-37-00232

Good evening Amanda,

I received the amended complaint from Plaintiff Planetone on May 09 2023 however I left for Uganda shortly after that due to the death of my friend.

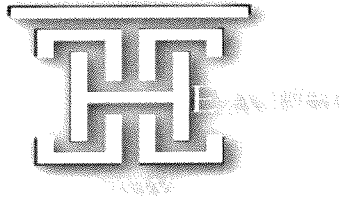
While in Uganda, On June 01, 2023, I mailed a motion to dismiss to the court through the Uganda Post Office. I would like to know if the motion was delivered and properly filed.

I have attached a copy herein.

Thanks,

Dorothy Pierce

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Re: PlanetONE Packaging, LLC v. American Pharma Machinery, LLC. and Delores Pierce a/k/a Dorothy Wells, a/k/a Dorothy Aleweny a/k/a Queen Dorothy Amolo

Case No.: 2023cp3700232

July 31, 2023

Please be advised that Heath Law, LLC has been retained to represent Dorothy Pierce in all matters pertaining to her defense Breach of Contract claim(s).

Should you have further questions or concerns, please do not hesitate to contact our office.

Thank you,

s/Nekedia Heath
Nekedia Heath, Esq.
Heath Law, LLC
P.O. Box 16043
Greenville, SC 29606
(864) 214-3132

Archived: Monday, August 17, 2026 11:16:52 AM
From: Dorothy Pierce
Mail received time: Mon, 23 Oct 2023 14:55:52
Sent: Mon, 23 Oct 2023 18:55:37
To: Amanda Watkins
Cc: McIntosh, Lawton Secretary (Tammy Jennings)
Subject: Re: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.
Importance: Normal
Sensitivity: None

Amanda,

I may need time to retain a new attorney to represent American Pharma Machinery (Company) in this case since I had to release Nekeida Heath as attorney

I will be representing myself in Prose on this matter. The company however requires an attorney.

Thank you.

Dorothy Pierce

On Mon, Oct 23, 2023 at 2:31 'a0PM Amanda Watkins <awatkins@oconeesc.com> wrote:

Tammy, thank you!

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>
Sent: Monday, October 23, 2023 2:20 PM
To: Amanda Watkins <awatkins@oconeesc.com>; McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>
Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothyperce84@gmail.com>
Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Amanda,

Judge McIntosh is on vacation this week, but we will be talking to him throughout the week. We will get you an answer as soon as we can.

Thank you,

Tammy Jennings

Administrative Assistant

Judge R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

(864)- 260-4059

lmcintoshsc@sccourts.org

From: Amanda Watkins <awatkins@oconeesc.com>
Sent: Monday, October 23, 2023 2:18 PM
To: McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>
Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothyperce84@gmail.com>
Subject: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

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Good Afternoon Chase,

The above case is set for several motion hearings on Tuesday, 10/31 at 2pm. Plaintiff's Counsel has contacted the Clerk's Office concerning two of these motions. The motion to set aside default and motion for default judgment were removed by Judge Maddox from the August term to be set for the next term of court depending on the outcome of the motion to set aside judgment. Would Judge McIntosh be agreeable with the Clerk's Office removing the motion for default judgment to a future term since that hearing depends on the outcome of the Defendant's motion to set aside judgment?

Also, just so the Judge is aware, the Defendant's Attorney, Nekedia Heath, has e-filed a motion and order to be relieved as counsel. Currently, this proposed order is in Judge Sprouse's Queue for consideration.

Please let me know how Judge McIntosh would like these motions handled.

Respectfully requested,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

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Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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**Archived:** Monday, August 17, 2026 11:17:00 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Mon, 30 Oct 2023 14:10:17  
**Sent:** Mon, 30 Oct 2023 18:11:08  
**To:** [Bradley, Patrick](#)  
**Cc:** [Amanda Watkins](#)  
**Subject:** Re: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [USPS-WA0016.jpg](#)  [SPS7.jpg](#) 

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Chris,

I sent copies of the receipts to my ex-attorney several weeks ago.

The post office called my personal assistant that the packages weren't delivered but returned to Uganda. Because it was already paid for, I advised them to resend the packages. The copy mailed to the court arrived some time ago. I'm sure your copy arrived too.

I have attached a copy of the receipt herein for your reference.

I will need time to hire a new attorney for American Pharma Machinery LLC,

I will proceed with defending my case pro se in tomorrow's hearing.

Thanks,

Dorothy

On Mon, Oct 30, 2023, 1:55 PM Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)> wrote:

Plaintiff PlanetONE would also reiterate its request for a continuance of tomorrow's hearing on Plaintiff's pending motion for default judgment, which is currently set to proceed after the Defendants' pending (and disputed) motions (which were continued by Judge Maddox at a hearing in August).

*If tomorrow's hearings on Defendants' motions go forward*, Plaintiff reiterates its request that tomorrow's hearing on Plaintiff's motion for default judgment, which is set to proceed after the Defendants' pending motions, be continued to the term of court after Defendants' pending motions are heard. Defendants' pending motions were continued by Judge Maddox at a hearing in August with the understanding that any hearing on Plaintiff's motion for default judgment would follow after a ruling on Defendants' motions.

*If tomorrow's hearings on Defendants' motions do not go forward*, Plaintiff would request clarity from the court on next steps. Plaintiff is prepared to file a memorandum today outlining the sequence of events here, but would emphasize that Judge Maddox previously continued the hearings on Defendants' motions to the next term of court requesting receipt of the promised proof of mailing from Defendants. That has not been provided, either prior to Defendants' counsel's recent motion to be relieved as counsel or after the entry of the court's order granting said motion last week.

Plaintiff is happy to set forth any further detail necessary in a filing with the court to clarify the issues, but given that Defendants have not provided any proof of mailing as directed by Judge Maddox, **Plaintiff requests the hearings on Defendants' motions go forward tomorrow with the Plaintiff's motion for default judgment being set for the next term of court.**

Please advise of any additional information needed from Plaintiff today, if tomorrow's hearings on Defendants' pending motions will go forward, if tomorrow's hearing on Plaintiff's pending motion for default judgment will be continued as requested, and if any further action is needed from Plaintiff at this time.

Thank you,  
Patrick

Haynsworth Sinkler Boyd P.A.

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:** Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>

**Sent:** Monday, October 30, 2023 1:18 PM

**To:** McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>; McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>

**Cc:** Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>; Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

**Subject:** RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Good Afternoon Chase,

I wanted to check back in with your office on the pending motions set for tomorrow. Current motions before the court are: Def. Pierce's Motion/Dismiss, Def. American Pharma's Motion/Set Aside Default, and Plt's Motion/Default Judgment. Since the first email, sent on 10/23, both Ms. Pierce and American Pharma's Attorney of Record has been relieved of counsel. Ms. Pierce is moving forward as Pro Se for herself at this time, however, American Pharma no longer has representation. Please let us know how the Judge would like to handle these motion hearings.

Respectfully requested,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)

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---

**From:** Amanda Watkins

**Sent:** Tuesday, October 24, 2023 10:08 AM

**To:** McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>; McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>

**Cc:** Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com); [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com); Dorothy Pierce <[dorothyperce84@gmail.com](mailto:dorothyperce84@gmail.com)>

**Subject:** RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Good morning Chase,

I wanted to let you know Judge Sprouse approved the Order for Attorney Heath to be relieved as counsel. She has been made inactive on this case.

Thank you,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)

R. 0363

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---

**From:** McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>

**Sent:** Monday, October 23, 2023 3:00 PM

**To:** Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>; McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>

**Cc:** Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com); [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com); Dorothy Pierce <[dorothyperce84@gmail.com](mailto:dorothyperce84@gmail.com)>

**Subject:** RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Sorry I duplicated Tammy's response! Saw it after I sent the email.

Respectfully,

**Chase Kinsey**

Law Clerk to the

Honorable R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

Cell: (864) 760-5936

Office: (864) 260-4059

[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)

---

**From:** Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>

**Sent:** Monday, October 23, 2023 2:32 PM

**To:** McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>; McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>

**Cc:** Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com); [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com); Dorothy Pierce <[dorothyperce84@gmail.com](mailto:dorothyperce84@gmail.com)>

**Subject:** RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

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Tammy, thank you!

Amanda Watkins

Chief Deputy Clerk of Common Pleas

R. 0364

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PO Box 678

Walhalla, SC 29691

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**From:** McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>

**Sent:** Monday, October 23, 2023 2:20 PM

**To:** Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>; McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>

**Cc:** Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com); [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com); Dorothy Pierce <[dorothyperce84@gmail.com](mailto:dorothyperce84@gmail.com)>

**Subject:** RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Amanda,

Judge McIntosh is on vacation this week, but we will be talking to him throughout the week. We will get you an answer as soon as we can.

Thank you,

**Tammy Jennings**

Administrative Assistant

Judge R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

(864)- 260-4059

[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)

---

**From:** Amanda Watkins <[awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)>

**Sent:** Monday, October 23, 2023 2:18 PM

**To:** McIntosh, Lawton Law Clerk (Chase Kinsey) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>; McIntosh, Lawton Secretary (Tammy

R. 0365

Jennings) <[jmcintosh@sccourts.org](mailto:jmcintosh@sccourts.org)>

Cc: Nekedia Heath <[nekedia@heathlaw.org](mailto:nekedia@heathlaw.org)>; [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com); [pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com); Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

Subject: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

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Good Afternoon Chase,

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Also, just so the Judge is aware, the Defendant's Attorney, Nekedia Heath, has e-filed a motion and order to be relieved as counsel. Currently, this proposed order is in Judge Sprouse's Queue for consideration.

Please let me know how Judge McIntosh would like these motions handled.

Respectfully requested,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

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Kampala GPO

RECEIPT No.: B-GPO-76-29340

TIN: 1000027427

Po 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 PLEAS

Reciever Address. 205 W MAINST.
WALHALLA SC
29691 USA

Reciever Contact. +8649167303

Vat UGX 0

Postage Fee. UGX 15,957

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Total: UGX 15,957

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R. 0368

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

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Thank You!!! Please Come Again**

Archived: Monday, August 17, 2026 11:16:55 AM
From: [Dorothy Pierce](#)
Mail received time: Mon, 30 Oct 2023 15:23:36
Sent: Mon, 30 Oct 2023 19:24:28
To: [Major, Chris](#)
Cc: [Bradley, Patrick](#)
Subject: Re: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.
Importance: Normal
Sensitivity: None
Attachments: [image001.gif](#)  [image001.gif](#) 

Bradley,

Your inappropriate accusations are offensive to me.

You have been dealing with my attorney and yet you are here trying to misrepresent facts. Nothing has changed. You received the mailed parcel and kept the truth to yourself and trying to manipulate the court about a package in your possession. This is a standard fraudulent practice.

You filed a frivolous lawsuit against me knowing that your client did business with my company. I will be filing sanctions against you for this frivolous lawsuit against me.

I won't tolerate this.

You should know that your illegal default order will go to the Supreme Court if it's not vacated.

I will see you tomorrow in court!!!!!!

Best regards,

Dorothy

On Mon, Oct 30, 2023, 3:00 PM Major, Chris <cmajor@hsblawfirm.com> wrote:

We have received nothing from Ms. Pierce, American Pharma, or the Defendants' prior attorney until this email today and nothing has been filed with the court. Similarly, serious questions exist about the authenticity of these documents. Even setting that aside, as set forth in our memorandum of law previously-filed with the court on August 17, 2023, Ms. Pierce proceeded at her own risk by purportedly depositing court papers with a carrier not recognized by South Carolina law as a valid method for service, cannot prove she did so, and has contradicted herself on numerous occasions.

Ultimately, we would request the court not approach these motions in piecemeal fashion if, as Ms. Pierce notes, counsel is going to be retained to represent American Pharma. The only defense motion that could be heard tomorrow without American Pharma is Ms. Pierce's motion to dismiss, but like American Pharma Ms. Pierce is currently in default pursuant to the Court's Entry of Default Against All Defendants entered on June 20, 2023. Thus her motion to dismiss, even proceeding pro se as to

herself only, should not be heard until the default issue is resolved, one way or another, as to all Defendants. The same applies to Plaintiff's motion for default judgment, which we would ask be placed on a calendar after Defendants' motions attacking the default have been decided so that we can coordinate witness travel without the risk of their attendance becoming moot depending on how Defendants' motions are resolved.

Haynsworth Sinkler Boyd P.A.

Christopher B. Major | Attorney
Direct 864.240.3211 | cmajor@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>

Sent: Monday, October 30, 2023 2:11 PM

To: Bradley, Patrick <pbradley@hsblawfirm.com>

Cc: Amanda Watkins <awatkins@oconeesc.com>; McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>; Nekedia Heath <nekedia@heathlaw.org>; Major, Chris <cmajor@hsblawfirm.com>

Subject: Re: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Chris,

I sent copies of the receipts to my ex-attorney several weeks ago.

The post office called my personal assistant that the packages weren't delivered but returned to Uganda. Because it was already paid for, I advised them to resend the packages. The copy mailed to the court arrived some time ago. I'm sure your copy arrived too.

I have attached a copy of the receipt herein for your reference.

I will need time to hire a new attorney for American Pharma Machinery LLC,

I will proceed with defending my case pro se in tomorrow's hearing.

Thanks,

Dorothy

On Mon, Oct 30, 2023, 1:55 PM Bradley, Patrick <pbradley@hsblawfirm.com> wrote:

Plaintiff PlanetONE would also reiterate its request for a continuance of tomorrow's hearing on Plaintiff's pending motion for default judgment, which is currently set to proceed after the Defendants' pending (and disputed) motions (which were continued by Judge Maddox at a hearing in August).

If tomorrow's hearings on Defendants' motions go forward, Plaintiff reiterates its request that tomorrow's hearing on Plaintiff's motion for default judgment, which is set to proceed after the Defendants' pending motions, be continued to the term of court after Defendants' pending motions are heard. Defendants' pending motions were continued by Judge Maddox at a

hearing in August with the understanding that any hearing on Plaintiff's motion for default judgment would follow after a ruling on Defendants' motions.

If tomorrow's hearings on Defendants' motions do not go forward, Plaintiff would request clarity from the court on next steps. Plaintiff is prepared to file a memorandum today outlining the sequence of events here, but would emphasize that Judge Maddox previously continued the hearings on Defendants' motions to the next term of court requesting receipt of the promised proof of mailing from Defendants. That has not been provided, either prior to Defendants' counsel's recent motion to be relieved as counsel or after the entry of the court's order granting said motion last week.

Plaintiff is happy to set forth any further detail necessary in a filing with the court to clarify the issues, but given that Defendants have not provided any proof of mailing as directed by Judge Maddox, **Plaintiff requests the hearings on Defendants' motions go forward tomorrow with the Plaintiff's motion for default judgment being set for the next term of court.**

Please advise of any additional information needed from Plaintiff today, if tomorrow's hearings on Defendants' pending motions will go forward, if tomorrow's hearing on Plaintiff's pending motion for default judgment will be continued as requested, and if any further action is needed from Plaintiff at this time.

Thank you,
Patrick

Haynsworth Sinkler Boyd P.A.

J. Patrick Bradley | Attorney
Direct 864.240.4567 | 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: Amanda Watkins <awatkins@oconeesc.com>

Sent: Monday, October 30, 2023 1:18 PM

To: McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>

Cc: Nekedia Heath <nekedia@heathlaw.org>; Major, Chris <cmajor@hsblawfirm.com>; Bradley, Patrick <pbradley@hsblawfirm.com>; Dorothy Pierce <dorothypierce84@gmail.com>

Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Good Afternoon Chase,

I wanted to check back in with your office on the pending motions set for tomorrow. Current motions before the court are: Def. Pierce's Motion/Dismiss, Def. American Pharma's Motion/Set Aside Default, and Plt's Motion/Default Judgment. Since the first email, sent on 10/23, both Ms. Pierce and American Pharma's Attorney of Record has been relieved of counsel. Ms. Pierce is moving forward as Pro Se for herself at this time, however, American Pharma no longer has representation. Please let us know how the Judge would like to handle these motion hearings.

Respectfully requested,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court
205 W Main St.
PO Box 678
Walhalla, SC 29691
(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: Amanda Watkins
Sent: Tuesday, October 24, 2023 10:08 AM
To: McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>
Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothypierce84@gmail.com>
Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Good morning Chase,

I wanted to let you know Judge Sprouse approved the Order for Attorney Heath to be relieved as counsel. She has been made inactive on this case.

Thank you,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>

Sent: Monday, October 23, 2023 3:00 PM

To: Amanda Watkins <awatkins@oconeesc.com>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>

Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothypierce84@gmail.com>

Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Sorry I duplicated Tammy's response! Saw it after I sent the email.

Respectfully,

Chase Kinsey

Law Clerk to the

Honorable R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

Cell: (864) 760-5936

Office: (864) 260-4059

lmcintoshlc@sccourts.org

From: Amanda Watkins <awatkins@oconeesc.com>

Sent: Monday, October 23, 2023 2:32 PM

To: McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>; McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>

Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothypierce84@gmail.com>

Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

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

Tammy, thank you!

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

R. 0374

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

awatkins@oconeesc.com

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From: McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>

Sent: Monday, October 23, 2023 2:20 PM

To: Amanda Watkins <awatkins@oconeesc.com>; McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>

Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothyperce84@gmail.com>

Subject: RE: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

Amanda,

Judge McIntosh is on vacation this week, but we will be talking to him throughout the week. We will get you an answer as soon as we can.

Thank you,

Tammy Jennings

Administrative Assistant

Judge R. Lawton McIntosh

P.O. Box 8002

Anderson, SC 29622

(864)- 260-4059

lmcintoshsc@sccourts.org

From: Amanda Watkins <awatkins@oconeesc.com>

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To: McIntosh, Lawton Law Clerk (Chase Kinsey) <lmcintoshlc@sccourts.org>; McIntosh, Lawton Secretary (Tammy Jennings) <lmcintoshsc@sccourts.org>

Cc: Nekedia Heath <nekedia@heathlaw.org>; cmajor@hsblawfirm.com; pbradley@hsblawfirm.com; Dorothy Pierce <dorothypierce84@gmail.com>

Subject: 2023CP3700232 // Planetone Packaging LLC vs. American Pharma Machinery LLC, et al.

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

Good Afternoon Chase,

The above case is set for several motion hearings on Tuesday, 10/31 at 2pm. Plaintiff's Counsel has contacted the Clerk's Office concerning two of these motions. The motion to set aside default and motion for default judgment were removed by Judge Maddox from the August term to be set for the next term of court depending on the outcome of the motion to set aside judgment. Would Judge McIntosh be agreeable with the Clerk's Office removing the motion for default judgment to a future term since that hearing depends on the outcome of the Defendant's motion to set aside judgment?

Also, just so the Judge is aware, the Defendant's Attorney, Nekedia Heath, has e-filed a motion and order to be relieved as counsel. Currently, this proposed order is in Judge Sprouse's Queue for consideration.

Please let me know how Judge McIntosh would like these motions handled.

Respectfully requested,

Amanda Watkins

Chief Deputy Clerk of Common Pleas

Oconee County Clerk of Court

205 W Main St.

PO Box 678

Walhalla, SC 29691

(864)916-7303 fax (864)638-4282

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**Archived:** Monday, August 17, 2026 11:17:04 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Mon, 6 Nov 2023 16:38:40  
**Sent:** Mon, 6 Nov 2023 21:39:40  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#)  [image001.gif](#) 

---

Hello Chris,

I will send you my comments by Wednesday end of the day.

Thanks,

Dorothy

On Mon, Nov 6, 2023, 3:45 PM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

Attached is a draft order setting out the rulings of the Court at the hearing and in his Form 4 Order. I would like to send this to chambers by the close of business on Friday, so please send me any comments on the order before then.

[Haynsworth Sinkler Boyd P.A.](#)

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@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](#)

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R. 0378

**Archived:** Monday, August 17, 2026 11:17:11 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 10 Nov 2023 11:01:57  
**Sent:** Fri, 10 Nov 2023 16:02:55  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#)  [image001.gif](#) 

---

Major,

I'm of the opinion that we finalize the proof of mailing verification so that the order is conclusive of my non default.

I think this is the right thing to do.

Best regards,

Dorothy Pierce

On Fri, Nov 10, 2023, 10:59 AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

As I have not received any comments to the proposed order, I will plan on sending it to the Court today.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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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:** Monday, November 6, 2023 4:40 PM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>

**Subject:** Re: PLANETone Packaging v. Pierce et al.

Hello Chris,

I will send you my comments by Wednesday end of the day.

Thanks,

Dorothy

On Mon, Nov 6, 2023, 3:45 PM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

Attached is a draft order setting out the rulings of the Court at the hearing and in his Form 4 Order. I would like to send this to chambers by the close of business on Friday, so please send me any comments on the order before then.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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ONE North Main, 2nd Floor | Greenville, SC 29601  
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**Archived:** Monday, August 17, 2026 11:17:07 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 10 Nov 2023 11:49:45  
**Sent:** Fri, 10 Nov 2023 16:49:27  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#) 

---

Yes, please do. Let the court decide.

On Fri, Nov 10, 2023 at 11:05 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

The Judge ruled that there would be a later hearing and finding on the proof. There will no doubt be a separate order from the Court setting forth its findings on that issue. The order that the Court requested last week is of his rulings at that hearing. I can forward these emails when I transmit the proposed order so that they have your opinion that the order should wait until after the mailing issue has been addressed.

Haynsworth Sinkler Boyd P.A.

Christopher B. Major | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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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:** Friday, November 10, 2023 11:03 AM  
**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>  
**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>  
**Subject:** Re: PLANETone Packaging v. Pierce et al.

Major,

I'm of the opinion that we finalize the proof of mailing verification so that the order is conclusive of my non default.

I think this is the right thing to do.

Best regards,

Dorothy Pierce

R. 0381

On Fri, Nov 10, 2023, 10:59 AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

As I have not received any comments to the proposed order, I will plan on sending it to the Court today.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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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:** Monday, November 6, 2023 4:40 PM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>

**Subject:** Re: PLANETone Packaging v. Pierce et al.

Hello Chris,

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Thanks,

Dorothy

On Mon, Nov 6, 2023, 3:45 PM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

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**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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ONE North Main, 2nd Floor | Greenville, SC 29601  
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**Archived:** Monday, August 17, 2026 11:17:14 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 09:28:18  
**Sent:** Fri, 8 Dec 2023 14:27:58  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#) 

---

Chris,

Has the court already signed the order you drafted in this matter?

I have not received any signed order.

I do not wish to miss any statutory protected deadlines in this matter.

Please advise,

Dorothy Pierce

On Fri, Nov 10, 2023 at 11:49 'a0AM Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)> wrote:  
Yes, please do. Let the court decide.

On Fri, Nov 10, 2023 at 11:05 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

The Judge ruled that there would be a later hearing and finding on the proof. There will no doubt be a separate order from the Court setting forth its findings on that issue. The order that the Court requested last week is of his rulings at that hearing. I can forward these emails when I transmit the proposed order so that they have your opinion that the order should wait until after the mailing issue has been addressed.

Haynsworth Sinkler Boyd P.A.

Christopher B. Major | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@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:** Friday, November 10, 2023 11:03 AM  
**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>  
**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>  
**Subject:** Re: PLANETone Packaging v. Pierce et al.

Major,

I'm of the opinion that we finalize the proof of mailing verification so that the order is conclusive of my non default.

I think this is the right thing to do.

Best regards,

Dorothy Pierce

On Fri, Nov 10, 2023, 10:59 AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

As I have not received any comments to the proposed order, I will plan on sending it to the Court today.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)  
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**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Sent:** Monday, November 6, 2023 4:40 PM  
**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>  
**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>  
**Subject:** Re: PLANETone Packaging v. Pierce et al.

Hello Chris,

I will send you my comments by Wednesday end of the day.

Thanks,

Dorothy

On Mon, Nov 6, 2023, 3:45 PM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

Attached is a draft order setting out the rulings of the Court at the hearing and in his Form 4 Order. I would like to send this to chambers by the close of business on Friday, so please send me any comments on the order before then.

**Christopher B. Major** | Attorney

Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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**Archived:** Monday, August 17, 2026 11:17:29 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 09:36:52  
**Sent:** Fri, 8 Dec 2023 14:36:33  
**To:** [Major, Chris](#)  
**Cc:** [oscarsmile4](#)  
**Subject:** Re: Affidavit of Mailing-2023CP3700232  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#) 

---

Chris,

An affidavit of Mailing was sent to you by Oscar Ojok. Did you receive this Affidavit or NOT?

If you had any specific requirements, you needed to communicate to Ojok Oscar who asked you for a valid mailing address several weeks ago after sending you a copy of his Affidavit.

Secondly, I have not received any court order yet since you drafted it.

I will take this matter to the Court of Appeals at this time as soon as I receive the order.

Best Regards,

Dorothy Pierce

On Fri, Dec 8, 2023 at 9:29 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

[Ms. Pierce,](#)

[It is inappropriate to constantly drag court officials into every communication you send me, especially these absurd diatribes. You are the one under a Court order to provide proof of the supposed June mailings that were not received by me or the Court. The one whose credibility is at issue here is you, not me or my client.](#)

[I will respond to you regarding what we need pursuant to Judge McIntosh's Order in a separate communication that does not take up any more time of the court officers.](#)

[Haynsworth Sinkler Boyd P.A.](#)

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**Sent:** Friday, December 8, 2023 9:21 AM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** oscarsmile4 <[oscarsmile4@gmail.com](mailto:oscarsmile4@gmail.com)>; [lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org); [lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org); [awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)

**Subject:** Re: Affidavit of Mailing-2023CP3700232

Mr. Major,

I expect you to be forthcoming about all the shipments from Uganda. Oscar Ojok mailed out an Affidavit again to the PO box address that you provided. Did you receive this mail or not? We have mailed documents three times and you claim you did not receive them and yet all parcels ever mailed from Uganda get delivered. In case of a bad address, it gets redelivered. You gotta be honest. You will NOT force a default judgment upon me by misrepresenting facts to the court

You are responsible for having a mailing address that receives mail.

If you procure a default judgment fraudulently, I will appeal this to the Court of Appeals.

Best regards,

Dorothy Pierce

On Fri, Nov 10, 2023 at 10:58 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Mr. Ojok,

My mailing address is P.O. Box 2048, Greenville, SC 29602.

Haynsworth Sinkler Boyd P.A.

Christopher B. Major | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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

**From:** oscarsmile4 <[oscarsmile4@gmail.com](mailto:oscarsmile4@gmail.com)>

**Sent:** Friday, November 10, 2023 10:57 AM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** [lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org); [lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org); [awatkins@oconeesc.com](mailto:awatkins@oconeesc.com); [dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)

**Subject:** Affidavit of Mailing-2023CP3700232

Hello Mr. Major,

My name is Oscar Ojok.

I'm the personal assistant to Queen Dorothy. I was the one that mailed the legal documents to you and and the South

R. 0388

Carolina court of common pleas. Queen Dorothy tells me that up to now your copy has never been delivered. I would like to mail to you my affidavit of Mailing. Please provide a valid mailing address that you use so that I can mail a hard copy of the affidavit.

Yours,

Oscar Ojok.

Sent from my Galaxy

---

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**Archived:** Monday, August 17, 2026 11:17:18 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 09:50:07  
**Sent:** Fri, 8 Dec 2023 14:49:46  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#) 

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Posta Uganda does not have any client Portal.

The sender has to go physically to the address with a parcel and the employees create a receipt and receive a package once it's paid.

Secondly, we already sent you a copy of the June receipt and an Affidavit.

The first address that you have on your pleadings according to your own words does not receive mail. You provided a second Mailing Address. It is not contested that I was in Uganda. It is not contested that my friend had died. The fact that I was not within the country alone would have been sufficient to vacate the default.

And now, you are not even forthcoming about receiving the third Mail to the address you provided. At this point, I don't trust you. The last time in court, you and the judge were discussing your heritage.

On Fri, Dec 8, 2023 at 9:35 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

Judge McIntosh's order is attached. It was just filed this week and we are in the process of getting it served on you. As mentioned in the order, I will need login credentials for the E-Posta account from which the alleged June shipment was made. I also need all communications with Mr. Ojok about any mailing to me or the Court in this matter and any electronic communications or files relating to the mailing or any proof the mailing occurred as you have represented to the Court.

Haynsworth Sinkler Boyd P.A.

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**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

**Sent:** Friday, December 8, 2023 9:28 AM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>; McIntosh, Lawton Law Clerk (Grace Kerley) <[lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org)>; McIntosh, Lawton Secretary (Tammy Jennings) <[lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org)>

**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>

**Subject:** Re: PLANETone Packaging v. Pierce et al.

Chris,

Has the court already signed the order you drafted in this matter?

I have not received any signed order.

I do not wish to miss any statutory protected deadlines in this matter.

Please advise,

Dorothy Pierce

On Fri, Nov 10, 2023 at 11:49 'a0AM Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)> wrote:

Yes, please do. Let the court decide.

On Fri, Nov 10, 2023 at 11:05 'a0AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

The Judge ruled that there would be a later hearing and finding on the proof. There will no doubt be a separate order from the Court setting forth its findings on that issue. The order that the Court requested last week is of his rulings at that hearing. I can forward these emails when I transmit the proposed order so that they have your opinion that the order should wait until after the mailing issue has been addressed.

Haynsworth Sinkler Boyd P.A.

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**Sent:** Monday, November 6, 2023 4:40 PM

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retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

**Archived:** Monday, August 17, 2026 11:17:33 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 10:08:54  
**Sent:** Fri, 8 Dec 2023 15:10:16  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: Affidavit of Mailing-2023CP3700232  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#)  [image001.gif](#) 

---

Chris,

I have met very dubious lawyers in this State. My trust in lawyer's words is zero.

You have to understand this.

I lost my friend, flew to Uganda, partially participated in an in-party primaries as demanded by the constituents. I had the busiest schedules, still, made sure a motion to dismiss was sent to you and the court.

I'm a sole owner of my company, which means to hire a lawyer, I needed to be physically here in the United States. This alone, would have been enough to vacate the default on both American Pharma and myself.

And by the way, I tried to talk to a few lawyers while in Uganda for American Pharma but didn't get a reply.

So, I look at "keeping in default until I prove the mailing" which I have already done, as a trick. I won't play along with it. All you have to do is reject everything I provide, like you have been doing and keep making unreasonable demands then I will be out of time to appeal the order.

I don't trust lawyers in this state and i don't know if i trust judges in this county. Everyone is friends with everyone.

If we can't reach a resolution in the next 10 days as to "Proof of Mailing" which I believe I have already done. I will have to appeal the order and also have a lawyer file a motion to vacate the default on behalf of American Pharma.

Best regards,

Dorothy Pierce

On Fri, Dec 8, 2023, 9:44 AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

As I indicated before, it is inappropriate to continually drag the Court officers into every communication. If you need to communicate with me, please do it directly without inappropriately dragging them into the discussion. I did receive the recent mailing from Mr. Ojok. I have also emailed you a copy of the Order that was just entered this week. A formal mailing will be forthcoming. Please provide the information requested in my separate email (and which the Court directed you to provide) as soon as possible so we can keep this matter moving along.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney

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

**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

**Sent:** Friday, December 8, 2023 9:37 AM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** oscarsmile4 <[oscarsmile4@gmail.com](mailto:oscarsmile4@gmail.com)>; [lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org); [lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org); [awatkins@oconeesc.com](mailto:awatkins@oconeesc.com);

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Secondly, I have not received any court order yet since you drafted it.

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Best Regards,

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**Cc:** oscarsmile4 <[oscarsmile4@gmail.com](mailto:oscarsmile4@gmail.com)>; [lmcintoshlc@sccourts.org](mailto:lmcintoshlc@sccourts.org); [lmcintoshsc@sccourts.org](mailto:lmcintoshsc@sccourts.org); [awatkins@oconeesc.com](mailto:awatkins@oconeesc.com)

**Subject:** Re: Affidavit of Mailing-2023CP3700232

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If you procure a default judgment fraudulently, I will appeal this to the Court of Appeals.

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Mr. Ojok,

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**Sent:** Friday, November 10, 2023 10:57 AM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

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**Subject:** Affidavit of Mailing-2023CP3700232

Hello Mr. Major,

My name is Oscar Ojok.

I'm the personal assistant to Queen Dorothy. I was the one that mailed the legal documents to you and and the South Carolina court of common pleas. Queen Dorothy tells me that up to now your copy has never been delivered. I would like to mail to you my affidavit of Mailing. Please provide a valid mailing address that you use so that I can mail a hard copy of the affidavit.

Yours,

Oscar Ojok.

Sent from my Galaxy

---

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**Archived:** Monday, August 17, 2026 11:17:22 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 10:16:37  
**Sent:** Fri, 8 Dec 2023 15:17:58  
**To:** [Major, Chris](#)  
**Cc:** [McIntosh, Lawton Law Clerk \(Grace Kerley\)](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#)  [image001.gif](#) 

---

Chris,

I'm not harassing the court in any way. I made a follow-up on a decision which involved the court. You included the court in your email thread prior to my email this morning. I just sent you an email to the email thread.

You want to paint me an a dishonest person to the court after I provided everything to you and yet you definitely don't want to come clean about mails being sent to you.

My email questioning your honesty suddenly becomes harassment.

I have zero trust in lawyers in this State. It's unfortunate that the court will believe a lawyer's words even when they are misrepresenting facts over and over even when a pro se like me is telling the truth.

On Fri, Dec 8, 2023, 10:08 AM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

I am not going to enable your continued harassment of the Court officials. If you want to communicate with me, please do it in the proper manner.

Haynsworth Sinkler Boyd P.A.

**Christopher B. Major** | Attorney  
Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)

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**Sent:** Friday, December 8, 2023 9:50 AM

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**Archived:** Monday, August 17, 2026 11:17:25 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Fri, 8 Dec 2023 10:18:39  
**Sent:** Fri, 8 Dec 2023 15:19:59  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None  
**Attachments:** [image001.gif](#)  [image001.gif](#) 

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**Archived:** Monday, August 17, 2026 11:16:42 AM  
**From:** [Dorothy Pierce](#)  
**Mail received time:** Thu, 11 Jan 2024 12:20:49  
**Sent:** Thu, 11 Jan 2024 17:22:43  
**To:** [Major, Chris](#)  
**Cc:** [Bradley, Patrick](#)  
**Subject:** Re: PLANETone Packaging v. Pierce et al.  
**Importance:** Normal  
**Sensitivity:** None

---

Mr. Major,

During the court hearing, the judge stated that I provide proof of mailing and you stated that the evidence submitted was not accompanied by an affidavit. Oscar sent you an affidavit shortly and later you changed the final draft order to a different requirement.

We don't have an online with Posta Uganda. Ojok Oscar doesn't have an online account with Posta Uganda.

Mr. Ojok has inquired if opening an online account will show past mailings. The post office stated it will show only the orders from the time of account creation.

Lastly, if we had any online account with post Uganda, providing you with access to an online account would be a breach of privacy and not acceptable.

You have every proof that the document was mailed to you, not once but twice.

We need to schedule a hearing to determine the evidence provide.

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**Sent:** Monday, November 6, 2023 4:40 PM

**To:** Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)>

**Cc:** Bradley, Patrick <[pbradley@hsblawfirm.com](mailto:pbradley@hsblawfirm.com)>; Pack, Angie <[apack@hsblawfirm.com](mailto:apack@hsblawfirm.com)>; Lollis, Paula <[Plollis@hsblawfirm.com](mailto:Plollis@hsblawfirm.com)>

**Subject:** Re: PLANETone Packaging v. Pierce et al.

Hello Chris,

I will send you my comments by Wednesday end of the day.

Thanks,

Dorothy

On Mon, Nov 6, 2023, 3:45 PM Major, Chris <[cmajor@hsblawfirm.com](mailto:cmajor@hsblawfirm.com)> wrote:

Ms. Pierce,

Attached is a draft order setting out the rulings of the Court at the hearing and in his Form 4 Order. I would like to send this to chambers by the close of business on Friday, so please send me any comments on the order before then.

**Christopher B. Major** | Attorney

Direct 864.240.3211 | [cmajor@hsblawfirm.com](mailto:cmajor@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](#)

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

In The Court of Appeals

[In The Supreme Court]

APPEAL FROM OCONEE COUNTY

Court of Common Pleas CASE NO.: 2023-CP-37-00232

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No.: 2024-000334

PlanetONE Packaging, LLC.....Respondent,

V.

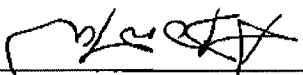
American Pharma Machinery, LLC, and Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Alweny a/k/a Queen Dorothy Amolo, Defendants,

Of Whom Dorothy Pierce a/k/a Dorothy Wells a/k/a Dorothy Alweny a/k/a Queen Dorothy Amolo is the Appellant.

NOTICE OF APPEAL

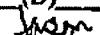
This is to formally notify all concerned parties that the undersigned, as Appellant, hereby files a Notice of Appeal pursuant to the Form 4 Order issued by the Honorable Judge McIntosh on February 10, 2024. This order denied the Appellant's Motion for Reconsideration, which was originally submitted on January 16, 2024. The basis for this appeal is predicated on matters of law.

Dated this March 06, 2024.

  
\_\_\_\_\_  
DOROTHY PIERCE -Appellant (Pro se)  
750 Mourning dove lane, Seneca, SC.29678.

Copies to:

Atty \_\_\_\_\_ (P) ☒ (D) \_\_\_\_\_

DSS \_\_\_\_\_ other 

Mailed \_\_\_\_\_ Boxed \_\_\_\_\_ handed ☒

R. 0411

FILED OCONEE COUNTY, SC  
MELISSA C. BURTON  
CLERK OF COURT  
2024 MAR 19 P 4:12

ENTERED  
  
COMPUTER

## CERTIFICATE OF SERVICE

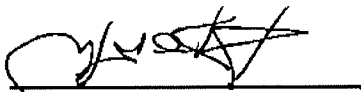
I certify that on this March 19, 2024, I served the foregoing Notice of Appeal to the respondent utilizing Certified mail as follows:

CHRISTOPHER B. MAJOR

cmajor@hsblawfirm.com

1 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

FILED OCONEE COUNTY, SC  
MELISSA C. BURTON  
CLERK OF COURT  
2024 MAR 19 P 4:12

ENTERED  
  
COMPUTER

R. 0412

## FORM 4

STATE OF SOUTH CAROLINA  
COUNTY OF Oconee  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2023CP3700232

Planetone Packaging Llc  
PLAINTIFF(S)

American Pharma Machinery Llc et al  
DEFENDANT(S)

## DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled);  
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ Bankruptcy;  
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
☐ Affirmed; ☐ Reversed; ☐ Remanded;  
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

Defendant Pierces motion to reconsider the Courts January 16th, 2024 order is denied without the necessity of a hearing. No formal order is required.

## ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

## For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 02/06/2024 .

Dorothy Pierce for Dorothy Pierce  
Queen Dorothy Amolo  
Dorothy Aleweny  
Dorothy Wells  
Dorothy Pierce for Dorothy Pierce  
American Pharma Machinery Llc

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

---



Oconee Common Pleas

**Case Caption:** Planetone Packaging Llc VS American Pharma Machinery Llc ,  
defendant, et al  
**Case Number:** 2023CP3700232  
**Type:** Order/Electronic Form 4

S/R. LAWTON McINTOSH

S/R.LAWTON McINTOSH

Electronically signed on 2024-02-06 11:36:37 page 3 of 3



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

CATHERINE S. HARRISON  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11829  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

March 12, 2024

Dorothy Pierce  
750 Mourning Dove Lane  
Seneca SC 29678

Re: PlanetONE Packaging LLC v. Dorothy Pierce  
Appellate Case No. 2024-000334

Dear Ms. Pierce:

Upon reviewing your notice of appeal, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or this matter will be dismissed:

- You must provide proof of filing the notice of appeal with Oconee County Court of Common Pleas.
- The accompanying proof of service is not in compliance with the SCACR. Pursuant to Rule 262(c)(3), SCACR, and *Re: Methods of Electronic Filing & Service Under Rule 262 of the South Carolina Appellate Court Rules*, S.C. Sup. Ct. Order dated May 6, 2022, only lawyers admitted to practice in South Carolina may serve other lawyers using the lawyer's primary email address in AIS, unless an agreement has been made in writing. You must provide proof of service via U.S. Mail or hand delivery.

Very truly yours,

*Catherine Hannissaw, deputy*

CLERK

cc: John Patrick Bradley, Esquire  
Christopher B. Major, Esquire

Public Index Message Screenshot showing date of damages  
hearing set by the Court for November 14, 2024

|                       |                                                              |        |  |                  |                  |                                                                                     |
|-----------------------|--------------------------------------------------------------|--------|--|------------------|------------------|-------------------------------------------------------------------------------------|
| Pierce, Dorothy       | Motion/Continuance and Cert of Service                       | Motion |  | 11/07/2024-15:21 | 11/13/2024-15:24 |  |
| Pierce, Dorothy       | Service/Proof Of/Emailed Hearing Notice                      | Filing |  | 10/10/2024-14:45 | 03/24/2025-14:45 |  |
| Bradley, John Patrick | 11/14/2024_MOTION_Roster/Notice of Motions Roster Publicatio | Action |  | 10/10/2024-14:42 | 11/13/2024-14:42 |                                                                                     |
| Pierce, Dorothy       | 11/14/2024_MOTION_Roster/Notice of Motions Roster Publicatio | Action |  | 10/10/2024-14:42 | 11/13/2024-14:42 |                                                                                     |
| Major, Christopher B. | 11/14/2024_MOTION_Roster/Notice of Motions Roster Publicatio | Action |  | 10/10/2024-14:42 | 11/13/2024-14:42 |                                                                                     |

# Public Index Message Screenshot re-setting damages hearing for January 29, 2025

|                       |                                                              |        |  |                  |                  |  |
|-----------------------|--------------------------------------------------------------|--------|--|------------------|------------------|--|
| Pierce, Dorothy       | Notice/Notice of Hearing                                     | Filing |  | 12/12/2024-16:28 | 03/24/2025-16:39 |  |
| Pierce, Dorothy       | 1/29/2025_MOTION_Roster/Notice of Motions Roster Publication | Action |  | 12/12/2024-16:28 | 03/24/2025-16:28 |  |
| Bradley, John Patrick | 1/29/2025_MOTION_Roster/Notice of Motions Roster Publication | Action |  | 12/12/2024-16:28 | 03/24/2025-16:28 |  |
| Major, Christopher B. | 1/29/2025_MOTION_Roster/Notice of Motions Roster Publication | Action |  | 12/12/2024-16:28 | 03/24/2025-16:28 |  |

**From:** [Dorothy Pierce](#)  
**To:** [Court Of Appeals Filings](#)  
**Subject:** NOTICE OF APPEAL  
**Date:** Wednesday, March 12, 2025 2:04:43 PM  
**Attachments:** [Notice of Appeal- Planetone- 2025.pdf](#)  
[Order Jan 31 2025.pdf](#)  
[Feb 26 order on fees.pdf](#)

---

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

Clerk,

Attached is the Notice of Appeal document for filing and certificate of service. The filing fee will be mailed to your office momentarily.

--

**DOROTHY PIERCE- Appellant.**  
**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**

**From:** [Dorothy Pierce](#)  
**To:** [Court Of Appeals Filings](#); [Bradley, Patrick](#); [Major, Chris](#)  
**Subject:** Motion to Amend Notice of Appeal and Amended Notice of Appeal-Appellate Case No. 2025-00049  
**Date:** Monday, March 24, 2025 2:03:50 PM  
**Attachments:** [POS- MOTION TO AMEND NOTICE OF APPEAL.pdf](#)  
[AMENDED NOTICE OF APPEAL- Planetone.pdf](#)  
[Motion to Amend Notice of Appeal- Planetone.pdf](#)  
[POS AMENDED NOTICE OF APPEAL- PLANETONE.pdf](#)  
[2023CP3700232 Order0001 March 24 2025 Final order.pdf](#)

---

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

Dear Clerk,

Please find attached the following documents for filing in the above-referenced case:

1. **Motion to Amend Notice of Appeal to Include Final Order**
2. **Amended Notice of Appeal**
3. **Proof of Service for Both Documents**
4. **Copy of the Final Order to Be Included in the Appeal**

I respectfully request that these documents be filed accordingly. Kindly confirm receipt at your earliest convenience.

Thank you for your time and assistance.

--

**DOROTHY PIERCE, Appellant**  
**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**

RECEIVED

Mar 24 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY

PlanetONE Packaging, LLC, Respondent,

V.

American Pharma Machinery, LLC, and Dorothy Piercea/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a QueenDorothy Amolo, Defendants,

Of whom Dorothy Pierce a/k/a Dorothy Wells a/k/aDorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

Case No. 2023-CP-37-00232

Appellate Case No. 2025-00049

**MOTION TO AMEND NOTICE OF APPEAL**

Appellant, Dorothy Pierce, respectfully moves this Court for leave to amend her Notice of Appeal filed on March 12, 2025, to include the final order signed by the Circuit Court on March 24, 2025. This motion is made pursuant to Rule 203(f), SCACR, and is supported by the following grounds:

**FACTUAL BACKGROUND**

1. On March 12, 2025, Appellant filed a Notice of Appeal following the Circuit Court's orders dated January 31, 2025 (determining damages) and February 26, 2025 (denying Appellant's request to cross-examine counsel on attorney's fees).
2. At the time of filing, Appellant reasonably believed that the January 31, 2025, and February 26, 2025, orders were final, as both conclusively resolved the substantive issues in the case. See **Elam v. S.C. Dep't of Transp.**, 361 S.C. 9, 602 S.E.2d 772 (2004) (holding that an appeal may proceed if the court's ruling resolved all substantive matters, even if additional ministerial actions, such as the signing of a formal order, remain pending).
3. On March 24, 2025, after Appellant had already filed her Notice of Appeal, the Circuit Court signed a formal final order prepared by Respondent's counsel as instructed by the Court.
4. Appellant now seeks to amend her Notice of Appeal to include the March 24, 2025 final order to ensure the entire record is properly before the Court.

## **LEGAL ARGUMENT**

1. Rule 203(f), SCACR, provides that an appellant may amend a notice of appeal with leave of the appellate court. Courts routinely permit amendments to a notice of appeal when doing so serves the interests of justice and ensures all relevant issues are properly reviewed.
2. The South Carolina Supreme Court has held that procedural technicalities should not obstruct a litigant's right to appellate review when the party has acted diligently to protect their rights. See **Bowie v. Town of West Pelzer**, 302 S.C. 245, 247, 395 S.E.2d 738, 739 (1990) (noting that technical defects in a notice of appeal should not bar review if no prejudice results).
3. Here, Appellant timely filed her Notice of Appeal on March 12, 2025, within 30 days of receiving written notice of the January 31, 2025, and February 26, 2025, orders. Since the March 24, 2025, order is merely a formal confirmation of those prior rulings, Appellant's initial filing substantially complied with Rule 203(b)(1), SCACR.
4. Permitting this amendment will not prejudice Respondent, as the March 24, 2025, order reflects the same substantive rulings already contested in Appellant's appeal. Furthermore, Respondent's counsel was the party responsible for drafting the March 24, 2025, final order, and thus cannot claim surprise or hardship.

## **CONCLUSION**

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

1. Grant Appellant leave to amend her Notice of Appeal to include the March 24, 2025, final order;
2. Grant any further relief this Court deems just and proper.

Respectfully submitted,

Dated March 24, 2025

S/N Dorothy Pierce

DOROTHY PIERCE, Pro Se Plaintiff

750 Mourning Dove Lane, Seneca, SC 29678

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

---

APPEAL FROM OCONEE COUNTY

PlanetONE Packaging, LLC, Respondent,

V.

American Pharma Machinery, LLC, and Dorothy Piercea/k/a Dorothy Wells a/k/a Dorothy Aleweny a/k/a QueenDorothy Amolo, Defendants,

Of whom Dorothy Pierce a/k/a Dorothy Wells a/k/aDorothy Aleweny a/k/a Queen Dorothy Amolo is the Appellant.

---

**Case No. 2023-CP-37-00232**

**Appellate Case No. 2025-00049**

---

**PROOF OF SERVICE**

I certify that on March 24, 2025, I served the foregoing Motion to Amend Notice of Appeal utilizing US Postal Service, with appropriate postage thereon, upon all parties of record, as follows:

CHRISTOPHER B. MAJOR

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

Greenville South Carolina 29601

S/N Dorothy Pierce

DOROTHY PIERCE, Pro Se Plaintiff

750 Mourning Dove Lane, Seneca, SC 29678

Dorothypierce84@gmail.com

Pro se Appellant

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY  
PlanetONE Packaging, LLC, Respondent,  
V.

American Pharma Machinery, LLC, and Dorothy Piercea/k/a Dorothy Wells a/k/a Dorothy  
Aleweny a/k/a QueenDorothy 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.

**Case No. 2023-CP-37-00232**  
**Appellate Case No. 2025-00049**

**AMENDED NOTICE OF APPEAL**

Pursuant to Rule 203(f), SCACR, Appellant, Dorothy Pierce, hereby submits this Amended Notice of Appeal to include the final order signed on March 24, 2025. This amendment supplements the original Notice of Appeal filed on March 12, 2025.

NOTICE IS HEREBY GIVEN that Appellant, Dorothy Pierce, appeals to the South Carolina Court of Appeals from the following orders issued by the Honorable R. Lawton McIntosh, Circuit Court Judge:

1. Order on Damages dated January 31, 2025;
2. Order Denying Cross-Examination on Attorney's Fees dated February 26, 2025; and
3. Final Order dated March 24, 2025.

This appeal is taken from each of these orders, including all underlying rulings, factual findings, and conclusions of law. Appellant contends that these orders contain reversible errors of law and procedural irregularities that resulted in significant prejudice.

**Dated March 24, 2025**

S/N Dorothy Pierce

DOROTHY PIERCE, Pro Se Plaintiff

750 Mourning Dove Lane, Seneca, SC 29678

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

---

APPEAL FROM OCONEE COUNTY

PlanetONE Packaging, LLC, Respondent,  
V.

American Pharma Machinery, LLC, and Dorothy Piercea/k/a Dorothy Wells a/k/a Dorothy  
Aleweny a/k/a QueenDorothy 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.

---

**Case No. 2023-CP-37-00232**  
**Appellate Case No. 2025-00049**

---

**PROOF OF SERVICE**

I certify that on March 24, 2025, I served the foregoing Amended Notice of Appeal utilizing  
US Postal Service, with appropriate postage thereon, upon all parties of record, as follows:

CHRISTOPHER B. MAJOR

One North main 2<sup>nd</sup> floor  
Greenville South Carolina 29601

S/N Dorothy Pierce

DOROTHY PIERCE, Pro Se Plaintiff  
750 Mourning Dove Lane, Seneca, SC 29678  
Dorothypierce84@gmail.com  
Pro se Appellant