

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Oct 19 2026
SC Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas
The Honorable R. Lawton McIntosh, Circuit Court Judge

Lower Court Case No. 2022-CP-37-00108
Appellate Case No. 2026-001168

Dorothy Pierce and American Pharma Machinery, LLC, *Plaintiffs*,

v.

Clements Electrical, Inc.; Alton Frederick Clements, Jr.; Janet Gay Clements; Jason Dix;
Nicholas Behringer; Jeffery Pilgrim; Sherry L. Burgess; Nicholson H. Jerry; Francesco Majia
Armando Frank; Melissa C. Chastain; Jared Adam Pierce, *Defendants*,

of which Dorothy Pierce is the *Appellant*,

and

Clements Electrical, Inc.; Alton Frederick Clements, Jr.; Janet Gay Clements; Jason Dix;
Nicholas Behringer; and Jeffery Pilgrim are the *Respondents*.

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO SERVE AND FILE INITIAL BRIEF**

Appellant Dorothy Pierce, appearing pro se, moves under Rules 240 and 263(a) of the South Carolina Appellate Court Rules (SCACR) for a thirty (30) day extension of time to serve and file her Initial Brief. She asks that the deadline be extended from October 19, 2026 to **November 18, 2026**. In support, Appellant states:

PROCEDURAL BACKGROUND

1. This appeal arises from Oconee County Court of Common Pleas Case No. 2022-CP-37-00108, filed February 9, 2022.

2. On December 9, 2025, the circuit court granted the Clements Electrical Defendants' Motion to Strike Appellant's Complaint. On February 17, 2026, the court denied Appellant's Motion to Reconsider by Form 4 order. Appellant received that order from the Clerk of Court on May 14, 2026.

3. Appellant served her Notice of Appeal on May 18, 2026. The appeal seeks review of the February 17, 2026 order, the order striking the Complaint, the order granting sanctions after the March 22, 2023 hearing, and related interlocutory rulings.

4. Appellant received the transcript of proceedings on September 17, 2026, and gave notice of its delivery to the Court and counsel that day.

5. Under Rule 208(a)(1), SCACR, the Initial Brief is due thirty (30) days after receipt of the transcript. The thirtieth day fell on Saturday, October 17, 2026, so under Rule 234(a), SCACR, the brief is due Monday, October 19, 2026.

6. This motion is filed on or before that deadline. This is Appellant's first request for an extension of time to file the Initial Brief.

GOOD CAUSE FOR THE EXTENSION

7. This case was litigated in the circuit court for several years, beginning in February 2022. As a result, the circuit court docket contains approximately 1,112 docket entries with approximately 1,430 attached documents, in addition to the transcript, all of which Appellant must review to prepare the Initial Brief.

8. Despite diligent effort, Appellant has not been able to complete the review of these materials and the drafting of the Initial Brief within the thirty (30) days allowed by Rule 208(a)(1), SCACR.

9. Appellant needs an additional thirty (30) days to finish the brief. This request is made in good faith and not for purposes of delay.

CONCLUSION

For these reasons, Appellant asks the Court to grant this motion and extend the time to serve and file her Initial Brief by thirty (30) days, to and including **November 18, 2026**.

Respectfully submitted,

/s/ Dorothy Pierce

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et al., *Defendants*,
of which Dorothy Pierce is the *Appellant*, and Clements Electrical, Inc., et al. are the
Respondents.

PROOF OF SERVICE

I, Dorothy Pierce, certify that on October 19, 2026, I served a true and correct copy of the foregoing **Appellant's Motion for Extension of Time to Serve and File Initial Brief** upon opposing counsel by electronic mail, addressed as follows:

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October 19, 2026