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Feb 19 2025

SC Court of Appeals

Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: DeQuincey Simmons v. SCDEW, et al.
Appellate Case No. 2024-001608

Objection to Respondents' Repeated Extension Requests

Dear Ms. Kitchings,

12/19/2025 VIA Email

I am writing to formally object to the Respondents' latest request for an extension to file their response brief. The Respondents have demonstrated a clear pattern of repeated delays in this matter, and their continued requests for additional time are both unjustified and prejudicial.

To illustrate the excessive nature of these delays:

- **November 2, 2023:** The case was assigned.
- **December 4, 2023:** Respondents requested a **10-day extension** to file the record on appeal.
- **March 22, 2024:** The Court granted the December 4, 2023 motion, resulting in a delay of over three months.
- **December 30, 2024:** The Court issued an order stating that the case would proceed if the Respondents failed to produce their brief.
- **January 27, 2025:** Respondents requested a **21-day extension**, which was granted, setting the deadline to **February 19, 2025**.
- **February 18, 2025:** Respondents submitted another **21-day extension request**, seeking to push the deadline to **March 12, 2025**.

This repeated cycle of extensions has resulted in substantial delays, despite the Respondents having ample time to file their required brief. It is worth noting that the Court's ruling on the December 4, 2023 motion was only issued on **March 22, 2024**, a delay of over three months. Allowing further extensions risks prolonging this case indefinitely, unfairly prejudicing me as the Appellant by preventing a timely resolution.

Moreover, the Respondents' justification for these repeated extensions—work obligations in other matters—is not a sufficient basis for continued delay. Litigation involves deadlines, and multiple extensions should not be granted simply because a party has other professional commitments.

Given the time that has already been afforded to the Respondents, I respectfully request that the Court **deny the latest extension request** and hold the Respondents to the existing deadlines to prevent further undue delay.

Thank you for your time and consideration.

Sincerely,

[Your Name]

[Your Contact Information]