

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

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MAR 03 2025
SC Court of Appeals

Re: DeQuincey Simmons v. SCDEW and Bridgestone Americas Tire Operations, LLC
Appellate Case No. 2024-001608

Objection to Respondents' Repeated Extension Requests

February 20, 2025 – VIA EMAIL

Dear Ms. Kitchings,

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. The Court's ruling on the December 4, 2023 motion was not issued until 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.

Furthermore, the Court **previously instructed Respondents that the case would proceed without their brief** if they failed to submit it in time. This order clearly indicated that Respondents were expected to be prepared by the set deadlines. Granting yet another extension undermines the Court's directive and signals that non-compliance with deadlines carries no consequence.

Additionally, the Respondents have already had ample time to prepare their brief, given that this case originated in small claims court and the relevant facts have been available for an extended

period. Their ongoing delay tactics place an undue burden on me as a **pro se litigant**, prolonging the appeals process and causing unnecessary hardship.

Request for Denial of Extension

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.

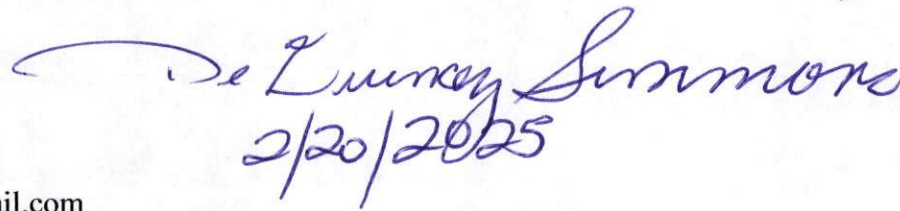
Proof of Service

In compliance with SCACR, I have served a copy of this **objection** and **proof of service** to:

- **Benjamin T. Hepner** – Littler Mendelson, P.C. (**BHepner@littler.com**)
- **Benjamin T. Cook** – South Carolina Department of Employment Workforce (**BCook@dew.sc.gov**)

Thank you for your time and consideration.

Sincerely,
DeQuincey G. Simmons
2503 Hiers Ct.
Hephzibah, GA 30815
dequinceysimmons@gmail.com
706-495-0738



DeQuincey G. Simmons
2/20/2025

**IN THE COURT OF APPEALS OF SOUTH CAROLINA
APPELLATE CASE NO. 2024-001608**

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MAR 03 2025

SC Court of Appeals

DeQuincey Simmons,
Appellant,

v.

**South Carolina Department of Employment Workforce and Bridgestone Americas Tire
Operations, LLC,**
Respondents.

PROOF OF SERVICE

I, **DeQuincey G. Simmons**, certify that on **February 20, 2025**, I served a copy of **Appellant's
Objection to Respondents' Third Request for Extension of Time to File Response Brief**
upon the following individuals via [**email/U. S. Mail**]:

- **Benjamin T. Hepner**
Little Mendelson, P.C.
110 E Court St, Suite 201, Greenville., SC 29601
BHepner@littler.com
- **Benjamin T. Cook**
South Carolina Department of Employment Workforce
- **Post Office Box 8597**
- **Columbia, SC 29202**
BCook@dew.sc.gov

I served this document by [**describe method—U.S. Mail and/or Email**]

Court Address:

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

I certify that the foregoing statement is true and correct under the penalties of perjury.

Dated: February 20, 2025

Signature:

DeQuincey G. Simmons

2503 Hiers Ct.

Hephzibah, GA 30815

dequinceysimmons@gmail.com 706-495-0738

DeQuincey Simmons 2/20/2025

DeQuincey Simmons
2503 Hiers Ct
Hephzibah, GA 30815

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SC Court of Appeals

Jenny Abbott Kitchings
Post office Box 11629
Columbia, South Carolina 29211

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