RECEIVED
Apr 08 2025
SC Court of Appeals

IN THE COURT OF APPEALS
STATE OF SOUTH CAROLINA
Appellate Case No. 2024-001608
DeQuincey G. Simmons, Appellant
v.
South Carolina Department of Employment and Workforce and Bridgestone Americas Tire Operations, LLC, Respondents

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MOTION TO CLARIFY COURT ORDERS, REQUIRE JUDICIAL AUTHENTICATION, AND STAY PROCEEDINGS PENDING RESOLUTION

INTRODUCTION

Appellant DeQuincey G. Simmons respectfully moves this Court to clarify a series of unsigned and inconsistently attributed orders, confirm the judicial identity of the individuals issuing rulings in this matter, and stay all further appellate proceedings pending the resolution of these constitutional and procedural violations. This motion is necessary to preserve the legitimacy of this appeal, restore procedural equality, and ensure that any future rulings are issued by a properly authorized judicial officer in compliance with the South Carolina Appellate Court Rules and the Due Process Clause of the Fourteenth Amendment.

This motion is not made out of disrespect, but out of necessity. The Court has repeatedly issued orders with no judicial signature, no identifiable authorship, and no acknowledgment of Appellant's filings. Meanwhile, Appellant has been subjected to threats of sanctions, delays in confirmation, and what appears to be procedural favoritism. This filing is not meant to attack the Court but to insist on transparency, accountability, and adherence to the rule of law.

PRELIMINARY STATEMENT REGARDING LACK OF JUDICIAL AUTHENTICATION

Appellant respectfully brings to the Court's attention a recurring and deeply troubling procedural issue that undermines the integrity of this appellate matter: multiple orders have been issued without any clear judicial authorship, signature, or attribution.

Throughout this appeal, the Court has issued at least five formal orders—dated December 30, 2024; January 28, 2025; February 20, 2025; March 7, 2025; and April 7, 2025—each of which imposed legal consequences or resolved contested motions. Yet none of these orders were signed by an identifiable judge or panel. Some were signed "FOR THE COURT" with no name or title, others bore cryptic initials with no printed designation, and one was attributed only to "Paula H. Thomas" with no indication of judicial authority.

Additionally, court personnel—such as Deputy Clerk Catherine Harrison—have issued written communications imposing deadlines and threatening dismissal of filings, without any indication that such instructions originated from a judge or judicial directive. These communications have carried procedural weight equivalent to rulings, despite originating from non-judicial personnel.

This lack of judicial transparency violates both the South Carolina Appellate Court Rules and fundamental principles of due process under the U.S. Constitution. Orders that affect the rights of litigants must be issued and signed by the judges who render them—not clerks, deputies, or unidentified parties operating in the background. In light of these continued irregularities and omissions, it is necessary to examine the governing rules and ethical obligations that define judicial responsibility in South Carolina's appellate system. **JUDICIAL CONDUCT AND PROCEDURAL AUTHORITY**

Appellant further asserts that the procedural breakdowns identified throughout this appeal are not isolated errors but direct violations of the South Carolina Appellate Court Rules and the Code of Judicial Conduct, Rule 501, SCACR. The repeated use of unsigned orders, unexplained initials, and clerical communications acting as rulings reflects not just negligence—but a systemic failure of judicial oversight.

Rule 221, SCACR requires that *"All decisions of the appellate court shall be by written opinion, order or memorandum opinion... [and] shall contain the names of the judges participating in the decision, and the name of the judge delivering the opinion or order."* Orders issued without judicial signatures, without attribution, or with only cryptic initials do not satisfy this rule. They are procedurally invalid on their face.

Rule 267, SCACR mandates that decisions by the Court of Appeals must be made by a panel of three judges unless otherwise ordered by the Chief Judge, and that each decision must *"contain the names of the judges participating and the name of the judge delivering the opinion or order."* The absence of this information in multiple orders issued in this case violates Rule 267 and undermines the legal force of those rulings.

These procedural defects also violate **Rule 501, Canon 1** of the South Carolina Code of Judicial Conduct, which demands that *"A judge shall uphold and promote the independence, integrity, and impartiality of the judiciary, and shall avoid impropriety and the appearance of impropriety."* Allowing clerical staff to issue documents carrying the weight of judicial orders—without judicial signatures—creates the **appearance of impropriety** and erodes public confidence in the appellate process.

Canon 2 reinforces this mandate: *"A judge shall perform the duties of judicial office impartially, competently, and diligently."* If judges are not reviewing filings, not issuing rulings, and not identifying themselves on orders, they are not performing their duties. The repeated failure to

rule on Appellant's motions—while Respondents are granted multiple do-overs and expedited docketing—further violates this Canon.

Canon 3(B)(8) provides: *"A judge shall dispose of all judicial matters fairly, promptly, and efficiently."* To date, Appellant's motions filed on March 11, 2025 and March 28, 2025 remain unruled upon. No explanation, no deferral, no assignment—just silence. This is not efficient. This is not prompt. It is a dereliction of judicial duty.

These failures are not merely violations of internal procedure—they implicate federal constitutional rights. In *Tumey v. Ohio*, 273 U.S. 510 (1927), the Supreme Court held that due process requires an impartial and known adjudicator. In *Ward v. Village of Monroeville*, 409 U.S. 57 (1972), the Court emphasized that even the appearance of judicial bias violates the Fourteenth Amendment. In *United States v. Morgan*, 313 U.S. 409 (1941), the Court made clear that the legal validity of a judicial order depends on the authority and identity of the officer rendering it.

In this case, Appellant cannot confirm whether he has been ruled on by one judge, four judges, or none at all. Multiple orders lack judicial signatures. One bears only initials. One is signed by a deputy clerk. One contains no signature of any kind. This is not a functioning appellate process—it is a façade.

LEGAL BASIS AND PROCEDURAL IRREGULARITY

This procedural breakdown is not just an oversight—it is a breach of governing authority. South Carolina Appellate Court Rule 269 expressly states that:

"Where an appeal, petition, motion, or return is frivolous or taken solely for the purposes of delay, or is not in compliance with these Rules, the appellate court may upon its own motion or that of a party, after ten (10) days' notice, impose upon offending attorneys or parties such sanctions as the circumstances of the case and discouragement of like conduct in the future may require."

However, the Court cannot enforce sanctions—or threaten to—absent a clear demonstration that a judicial officer made such a determination. The April 7, 2025 order attempts to "caution" the Appellant about fabricated citations and even threatens sanctions while failing to establish any judge's identity or actual review. This vague, unsigned order references *Rouvet v. Rouvet*, 388 S.C. 301 (Ct. App. 2010) and *State v. Burton*, 356 S.C. 259 (2003), neither of which establish the authority of a deputy clerk to wield judicial power under the guise of a court's voice.

Rule 501, Canon 1 of the South Carolina Code of Judicial Conduct further reinforces that "[a] judge shall uphold and promote the independence, integrity, and impartiality of the judiciary." Allowing clerical staff to sign orders, impose filing deadlines, or threaten parties with sanctions—without judicial review—shatters this canon.

The U.S. Constitution's Due Process Clause (Fourteenth Amendment) prohibits legal consequences issued by administrative staff outside lawful judicial process. This is not merely about formality. It is about who holds the authority to rule. A faceless signature or a clerk's name on judicial documents is not just improper—it is constitutionally infirm.

PROCEDURAL TIMELINE & RESPONSE DISPARITY

The timeline of filings in this matter further reveals the procedural favoritism and imbalance in how Appellant and Respondents have been treated.

• March 11, 2025, 8:54 AM – Appellant submitted a filing by email. No response or acknowledgment was received. Only after personally calling the Court on March 12 did Appellant receive confirmation at 2:49 PM, more than 28 hours later.
• March 28, 2025, 7:56 AM – Appellant filed the Motion to Strike Respondents' Brief, For Sanctions, and to Stay Proceedings via email. Again, no automatic acknowledgment was received. Appellant followed up by phone to confirm receipt. Only then did the Court acknowledge it on March 31 at 3:46 PM, nearly three days later.

Compare that to the rapid acknowledgment and repeated leniency shown to Respondents:

• April 7, 2025, 3:02 PM – Respondents filed their Response in Opposition to Appellant's March 28 Motion.
• April 7, 2025, 3:20 PM – The Court acknowledged Respondents' filing within 18 minutes.
• April 7, 2025, 3:42 PM – Respondents submitted a "corrected" filing with a missing certificate of service.
• April 7, 2025, 4:12 PM – The Court acknowledged that amended filing within 30 minutes.
• April 7, 2025, 4:16 PM – Respondents submitted yet another correction to include a missing exhibit.
• April 7, 2025, 4:19 PM – Court responded again within 3 minutes, stamping and filing their revised submission.

Respondents had three separate attempts to perfect a filing in the span of a single hour, each time receiving rapid confirmation and accommodation. Meanwhile, Appellant's filings—though timely—were never acknowledged unless manually confirmed through follow-up calls. This not only suggests procedural favoritism, but a systemic disparity in how filings are received, processed, and docketed.

The cumulative effect is denial of equal access to the appellate process, which is a due process violation under both state and federal law. If one party is required to chase down acknowledgment while the other is granted three do-overs with red carpet speed, the judicial process becomes a performance rather than a proceeding.

COURT'S MISUSE OF RESPONDENTS' ACCUSATIONS AND THE "MOOT" DODGE

On April 7, 2025, the Court issued an unsigned order that borrowed specific language from Respondents' filings to accuse Appellant of using "non-existent case law and quotations."

Notably, the phrase appears verbatim in Respondents' March 20, 2025 response, in which they claim Appellant fabricated a quote from *Williams v. Reed*, 361 U.S. 349 (1960):

"Excessive delays in the processing of claims for public assistance may deprive claimants of property without due process."

Respondents alleged this quote did not appear in the case. Rather than independently investigate or cite actual page numbers, the Court echoed their claim—without citing the quote, the case, or the page, and without offering Appellant any opportunity to respond.

This is not judicial review. This is judicial copy-paste.

Even more concerning, the Court's April 7 Order included a threat of sanctions under Rule 269, SCACR—again, without identifying the alleged violations, offering proof, or providing the mandatory ten (10) days' notice required by the Rule. The threat itself was unsigned, issued anonymously, and procedurally unsupported.

Additionally, Appellant had moved to stay the appeal pending resolution of the motion to strike and other procedural violations. The Court declared this request "moot" in the April 7 Order, without analysis, without addressing Appellant's reasoning, and without any review of the broader due process concerns raised. It was simply dismissed in passing—like an inconvenience, not a filing.

This is not an isolated event. It reflects a pattern:
• The Court reuses Respondents' arguments without independent review;
• It imposes warnings on Appellant without due process;
• And it ignores substantive motions by declaring them "moot" without engaging with their content.

These actions are procedurally improper, constitutionally questionable, and require immediate clarification.

LEGAL FRAMEWORK: DUE PROCESS, JUDICIAL ACCOUNTABILITY, AND EQUAL PROTECTION UNDER THE LAW

The procedural issues identified in this motion do not exist in a vacuum. They implicate core constitutional rights, judicial ethics, and established precedent from both the South Carolina judiciary and the United States Supreme Court. Appellant outlines the following legal framework in support of this motion:

1. Judicial Orders Must Be Issued by an Identifiable Judicial Officer
• *Tumey v. Ohio*, 273 U.S. 510 (1927)
• *In re Murchison*, 349 U.S. 133 (1955)

2. Clerical Staff Cannot Exercise Judicial Power
- *Johnson v. Mississippi*, 403 U.S. 212 (1971)
- Rule 501, Canon 1, SCACR

3. Due Process Requires Notice, Opportunity to Respond, and Clarity of Accusation
- *Mathews v. Eldridge*, 424 U.S. 319 (1976)
- *Goldberg v. Kelly*, 397 U.S. 254 (1970)

4. The Appearance of Judicial Bias or Favoritism Is a Constitutional Violation
- *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009)

5. A Case Cannot Be Declared Moot While Unresolved Issues Remain
- *Chafin v. Chafin*, 568 U.S. 165 (2013)

6. Procedural Bias and Unequal Access to the Court Record Violates Due Process
- *North Carolina v. Pearce*, 395 U.S. 711, 725 (1969)
- *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996)
- *Bush v. Gore*, 531 U.S. 98 (2000)
- *Gideon v. Wainwright*, 372 U.S. 335 (1963)

GROUNDS FOR STAY OF PROCEEDINGS

Appellant respectfully moves this Court to stay all proceedings in this matter on the basis that multiple prior filings, objections, and motions submitted by Appellant have gone unaddressed, unresolved, or have been dismissed without judicial explanation. The progression of this appeal cannot continue while unresolved violations of due process and procedural equality remain on the record.

Key filings submitted by Appellant—including those on March 11, 2025 and March 28, 2025—raised substantive procedural challenges and specific objections to Respondents' conduct and the Court's acceptance of their filings. These motions were not reviewed by an identifiable judge, not acknowledged in the docket with proper attribution, and in some instances, were responded to only after Appellant followed up directly by phone. In one instance, the Court declared a pending motion "moot" without addressing the argument presented.

By continuing this appeal while these motions remain unresolved, the Court undermines Appellant's ability to secure meaningful review and a fair appellate record. Further proceedings must be held in abeyance until these violations are reviewed, ruled upon, and corrected by an identifiable judicial authority.

Appellant is not requesting delay for delay's sake, but is instead asserting the right to be heard—fully, properly, and fairly—before this appeal continues.

- *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982)
- *Mathews v. Eldridge*, 424 U.S. 319 (1976)

FLIPPING RESPONDENTS' CITED CASES

The Court cites *Rouvet v. Rouvet*, 388 S.C. 301 (Ct. App. 2010), and *State v. Burton*, 356 S.C. 259 (2003), to support its warning against Appellant's conduct. But in both cases, the courts issued fully signed, authored opinions, and the pro se litigants were afforded complete opportunities to present arguments before judgment was entered.

Here, Appellant has been denied meaningful review, denied identification of judicial officers, and denied engagement on multiple prior motions. The standards cited in *Rouvet* and *Burton* support fairness—not anonymous threats and unexplained dismissals.

EXHIBITS

Appellant includes the following exhibits as documentation of the procedural irregularities, clerical overreach, and unsigned rulings addressed in this motion. These exhibits are resubmitted for clarity and completeness, regardless of whether previously filed:

- **Exhibit A** – Order dated December 30, 2024, attributed to "Paula H. Thomas" with no judicial title or signature.
- **Exhibit B** – Order dated January 28, 2025, signed by Deputy Clerk Catherine Harrison, imposing filing consequences without judicial signature.
- **Exhibit C** – Notice dated February 20, 2025, issued by Deputy Clerk Harrison, stating that Appellant's objection "would not be considered" unless corrected, without judicial review or signature.
- **Exhibit D** – Order dated March 7, 2025, signed only with initials "H.B.W. C.J.", with no printed name or judge attribution.
- **Exhibit E** – Order dated April 7, 2025, unsigned and echoing language from Respondents' March 20, 2025 submission, threatening sanctions without citing specific violations or providing opportunity to respond.

These exhibits form a documented pattern of unsigned and procedurally unsupported rulings, inconsistent acknowledgement timelines, and administrative overreach inconsistent with constitutional requirements and SCACR.

Appellant asserts that none of the orders included in Exhibits A through E are legally binding or enforceable, as they were not issued by an identifiable judicial officer in accordance with Rule 269, SCACR, or the Due Process Clause of the Fourteenth Amendment. These documents—some signed by administrative staff, others bearing initials or lacking signatures entirely—reflect a fragmented and legally opaque process.

Notably, the orders display at least three distinct signatures or identifiers:

1. "Paula H. Thomas" with no judicial designation,
2. Deputy Clerk Catherine Harrison, a non-judicial administrator,
3. "H.B.W. C.J.", a cryptic set of initials with no clarification.
   One order carries no signature at all.

Appellant cannot determine whether he has been ruled on by one judge, four judges, or no judge at all. This lack of transparency is not merely confusing—it is unconstitutional.

- *Ward v. Village of Monroeville*, 409 U.S. 57 (1972)
- *United States v. Morgan*, 313 U.S. 409 (1941)
- *Tumey v. Ohio*, 273 U.S. 510 (1927)

These orders are submitted not as valid rulings, but as **evidence of procedural disarray** and the ongoing failure of the Court to provide Appellant with identifiable judicial oversight.

RELIEF REQUESTED
Appellant respectfully requests that this Court:

1. **Clarify** the April 7, 2025 Order by identifying:
   a. The specific case law or quotations alleged to be "non-existent" or incorrect, and
   b. The judicial officer(s) responsible for issuing the Order, including whether it was reviewed or signed by a judge;
2. **Authenticate** all prior orders issued in this matter by:
   a. Confirming the identity and judicial status of the individual(s) responsible for the rulings issued on December 30, 2024; January 28, 2025; February 20, 2025; March 7, 2025; and April 7, 2025; and
   b. Stating whether any of these orders were issued under lawful judicial authority, or by administrative staff without proper judicial delegation;
3. **Review and rule on** all previously submitted motions and objections filed by Appellant, including filings on March 11, 2025 and March 28, 2025, which have not been acknowledged or addressed by the Court;
4. **Declare invalid** any orders or rulings issued by non-judicial personnel or anonymous authors lacking proper judicial authority or review;
5. **Stay all further appellate proceedings**, including current and future deadlines, until the Court resolves the above issues and issues a signed, judicially-authored ruling confirming the integrity and legitimacy of this appellate process;
6. **Affirm** that administrative personnel—including clerks, deputy clerks, or other staff—shall not issue orders carrying legal weight unless signed and expressly authorized by a judicial officer;
7. **Confirm** that Appellant shall receive equal procedural treatment, including timely acknowledgment of filings, equal access to corrections, and full review of motions before denial or dismissal;

and

8. **Grant any further relief** this Court deems necessary to uphold the South Carolina Appellate Court Rules, the Code of Judicial Conduct, and Appellant's constitutional right to due process and equal protection under the law.

DeQuincey Simmons, Pro Se

2503 Hiers Ct Hephzibah, GA 30815

Email: dequinceysimmons@gmail.com

De Quincey Simmons
4/8/2025

Exhibit A

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201

TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

December 30, 2024

Mr. Benjamin Thomas Cook, Esquire
PO Box 8597
Columbia SC 29202

Mr. Benjamin Tradd Hepner, Esquire
110 E. Court Street, Suite 201
Suite 201
Greenville SC 29601

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

Dear Counsel:

Pursuant to the Court's order filed December 30, 2024, you may file an initial brief of respondent within thirty (30) days from the date of this letter or the appeal will proceed without consideration of your brief.

Very truly yours,

Catherine Harrison, deputy

CLERK

cc: DeQuincey G. Simmons

Exhibit B

The South Carolina Court of Appeals

DeQuincey G. Simmons, Appellant,

v.

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

Appellate Case No. 2024-001608

The Honorable Ralph King Anderson, III
Trial Court Case No. 2023ALJ220429AP

ORDER

The time for serving and filing the initial brief of respondents is hereby extended until February 19, 2025.

FOR THE COURT

BY Catherine Hanisal, deputy
CLERK

Columbia, South Carolina

FILED
Jan 28 2025

cc:
DeQuincey G. Simmons
Benjamin Thomas Cook, Esquire
Benjamin Tradd Hepner, Esquire

Exhibit C

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211

1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201

TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

February 20, 2025

DeQuincey G. Simmons
2503 Hiers Ct.
Hephzibah GA 30815

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

Dear Mr. Simmons:

Upon reviewing your objection to respondents' extension request, the following deficiency has 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 your filing will not be considered:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

Catherine Harrison, deputy

CLERK

cc: Benjamin Thomas Cook, Esquire
Benjamin Tradd Hepner, Esquire

Exhibit D

The South Carolina Court of Appeals

DeQuincey G. Simmons, Appellant,

v.

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

Appellate Case No. 2024-001608

The Honorable Ralph King Anderson, III
Trial Court Case No. 2023ALJ220429AP

ORDER

The Court has received respondent's motion for extension of time to file the initial brief of respondents and designation of matter. Appellant's objection was received. The motion is Granted. The time for serving and filing the initial brief of respondent and designation of matter is hereby extended until March 12, 2025.

_____ C.J.
FOR THE COURT

Columbia, South Carolina

cc:
DeQuincey G. Simmons
Benjamin Thomas Cook, Esquire
Benjamin Tradd Hepner, Esquire

FILED
Mar 07 2025

Exhibit E

The South Carolina Court of Appeals

DeQuincey G. Simmons, Appellant,

v.

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

Appellate Case No. 2024-001608

ORDER

Appellant filed a "motion to strike Respondents' brief and for sanctions for procedural violations and unjustified extensions." Respondents filed a return, opposing Appellant's motion to strike and for sanctions and arguing for sanctions against Appellant due to his citations to non-existent case law and non-existent quotations from existing case law.[1] Appellant filed a reply, reiterating his earlier arguments and asking to hold the appeal in abeyance pending resolution of his motion. After careful consideration, we deny Appellant's motion to strike Respondents' brief and for sanctions. Further, we deny Respondent's motion for

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[1] We take this opportunity to caution Appellant not to use non-existent citations and quotations. *See* Rule 269, SCACR ("Where an appeal, petition, motion[,] or return is frivolous or taken solely for the purposes of delay, or is not in compliance with these Rules, the appellate court may upon its own motion or that of a party, after ten (10) days['] notice, impose upon offending attorneys or parties such sanctions as the circumstances of the case and discouragement of like conduct in the future may require."); *Rouvet v. Rouvet*, 388 S.C. 301, 310, 696 S.E.2d 204, 208 (Ct. App. 2010) ("[L]ack of familiarity with legal proceedings is not an acceptable excuse and the court will hold a layman to the same standard as an attorney."); *State v. Burton*, 356 S.C. 259, 265 n.5, 589 S.E.2d 6, 9 n.5 (2003) ("A pro se litigant who knowingly elects to represent himself assumes full responsibility for complying with substantive and procedural requirements of the law.").

Exhibit E

sanctions against Appellant. Finally, we hold Appellant's motion to hold the appeal in abeyance is moot. If Appellant wishes to file an initial reply brief, Appellant shall file and serve his initial reply brief within ten days of the date of this order and the record on appeal shall be due thirty days thereafter. If Appellant does not wish to file an initial reply brief, Appellant shall file and serve the record on appeal within thirty days of the date of this order.

FOR THE COURT

Columbia, South Carolina

FILED
Apr 07 2025

cc:
DeQuincey G. Simmons
Benjamin Thomas Cook, Esquire
Benjamin Tradd Hepner, Esquire

RECEIVED
Apr 08 2025
SC Court of Appeals

Appellate Case No. 2024-001608

PROOF OF SERVICE

Re: Motion to Clarify Court Orders, Require Judicial Authentication, and Stay Proceedings Pending Resolution

Dated: April 8, 2025

I, **DeQuincey G. Simmons**, hereby certify that I have served a copy of the foregoing **Motion to Clarify Court Orders, Require Judicial Authentication, and Stay Proceedings Pending Resolution** on the following parties by **email** and **U.S. Mail**, postage prepaid, on **April 8, 2025**:

Benjamin T. Cook, Esquire
Post Office Box 8597
Columbia, SC 29202
BCook@dew.sc.gov

Benjamin T. Hepner, Esquire
110 E Court St., Suite 201
Greenville, SC 29601
(864) 775-3200
BHepner@littler.com

I affirm that the above statements are true and correct to the best of my knowledge.

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

DeQuincey Simmons
4/8/2025