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Oct 03 2025

SC Court of Appeals

**MOTION FOR EXTENSION OF TIME**

**IN THE SOUTH CAROLINA COURT OF APPEALS**

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**DeQuincey G. Simmons, Appellant**

v.

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

**Appellate Case No. 2024-001608**

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**MOTION FOR EXTENSION OF TIME TO FILE THE RECORD ON APPEAL**

**NOW COMES the Appellant, DeQuincey G. Simmons**, respectfully requesting a final 21-day extension of time to file the Record on Appeal, currently due **October 3, 2025**, and in support thereof states as follows:

1. Appellant has made a good faith effort to comply with all procedural obligations in this matter and has not acted in bad faith or with delay for delay's sake.
2. Appellant has encountered a confluence of extraordinary circumstances outside his control, including but not limited to:
  - Ongoing repairs to property caused by significant hurricane damage, which has required extensive rebuilding and disruption of living and working conditions;
  - Delays and complications stemming from the unavailability of initial contractors, who were detained and deported during the repair process, necessitating a complete restart with new workers and creating further uncertainty;
  - A recent personal accident on **09/27/2024** resulting in physical and mental hardship, for which Appellant is receiving treatment;
  - Ongoing chiropractic and medical care interfering with his ability to complete filings within the initial extension period;
  - Emotional and psychological stress directly related to these combined factors, which has severely impacted the ability to finalize the Record on Appeal with the diligence it requires.
3. Appellant is actively seeking assistance from federal disaster relief programs through the Small Business Administration (SBA), and is still navigating those processes during the same time period the Court's deadline is pending.
4. Appellant is not seeking this extension for improper purposes but to ensure the integrity and completeness of the Record on Appeal in light of genuinely extraordinary and unpredictable circumstances.
5. No party will be prejudiced by the granting of a modest, final 21-day extension.
6. Appellant is aware the Court previously indicated no further extensions would be granted absent extraordinary circumstances. The facts outlined herein meet that threshold, both individually and collectively.

**WHEREFORE**, Appellant respectfully requests the Court grant an additional **21-day extension**, moving the new due date for filing and serving the Record on Appeal to **October 24, 2025**, and for such other relief as the Court deems just and proper.

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

Dated: **October 3, 2025**

*De Quincey Simmons*  
*10/3/2025*

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### **PROOF OF SERVICE**

I certify that a copy of the foregoing Motion for Extension of Time was served via both email and U.S. Mail, first-class postage prepaid, on the following:

**Benjamin T. Cook, Esquire**  
South Carolina Department of Employment and Workforce  
Post Office Box 8597  
Columbia, SC 29202  
BCook@dew.sc.gov

**Benjamin T. Hepner, Esquire**  
Littler Mendelson, P.C.  
110 E Court Street, Suite 201  
Greenville, SC 29601  
BHepner@littler.com

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**SC Court of Appeals**

*DeQuincey G. Simmons*  
*October 3, 2025*

*De Quincey Simmons*  
*10/3/2025*

**Exhibit A – SBA Loan Modification Summary**

**Exhibit B – SBA Progress Report Submission Confirmation**

**Exhibit C – Accident Report**

**Exhibit D – Ongoing Chiropractic Treatment Documentation**

# Loan Modification Summary



U.S. Small Business Administration



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## SBA Disaster Home Loan Modification Request

for Markishia Gilkey and Dequincey Simmons

[REDACTED]

Loan Amount

Current Status

Closing Completed

Loan Modification Number

[REDACTED]

Disaster

Georgia HURRICANES (GA-20013)



### What's happening right now?

Your loan application in progress. Come back to this screen to see if there's anything you need to do.



[View Loan Terms](#)

**Case Manager for this application: Atim Ekpe. For further assistance, please reach out to 1-800-366-6303**

[Need Help?](#)

Exhibit B



## Your Progress Report Request is Submitted

Type: Important Information

Loan Application Number: [REDACTED]

From: U.S. Small Business Administration

09/29/2025, 01:37 PM EDT

A Progress Report has been submitted on your behalf and is under review.

You can view the Progress Inspection Report by clicking "Showing Inactive Applications" on the home screen and then clicking the Loan Modification Request.

SBA will send a message to you if additional information is necessary to process your request.

If you have any questions, please call our Customer Service Center at 1-800-659-2955.

COLLISION FIELDS

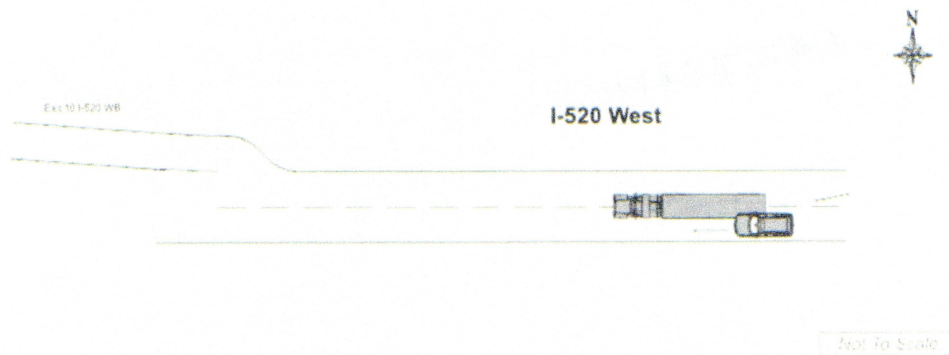
|                            |   |                |                        |                                   |
|----------------------------|---|----------------|------------------------|-----------------------------------|
| Manner of Collision: Angle | Location at Area of Impact: On Roadway - Non-Intersection | Weather: Clear | Surface Condition: Dry | Light Condition: Dark-Not Lighted |
|----------------------------|---|----------------|------------------------|-----------------------------------|

NARRATIVE

On 092724 Vehicle 1 was traveling west bound on I-520 in the right lane. Vehicle 2 was traveling west bound on I-520 in the left lane. Vehicle 1 changed lanes to avoid hitting debris in the roadway, when changing lanes Vehicle 1's left far rear struck Vehicle 2's right far front. Vehicle 1 is at fault for improper lane change.

BWC was active.

DIAGRAM



PROPERTY DAMAGE INFORMATION

Damage Other Than Vehicle: Owner:

WITNESS INFORMATION

| Name (Last, First) | Address | City | State | Zip Code | Telephone Number |
|--------------------|---------|------|-------|----------|------------------|
|--------------------|---------|------|-------|----------|------------------|

OCCUPANT INFORMATION

|   |  |           |           |                                 |   |                      |                        |                               |                                |                         |
|---|--|-----------|-----------|---------------------------------|---|----------------------|------------------------|-------------------------------|--------------------------------|-------------------------|
| 1 | Name (Last, First): DAVIS, WILLIE      |           |           |                                 | Address: 608 HERNDON ST MILLEN (JENKINS), GA 30442        |                      |                        |                               |                                |                         |
|   | Age: 60                                | Sex: Male | Unit #: 1 | Position: Front Seat-Left Side  | Safety Eq: Lap and Shoulder Belt Used                     | Ejected: Not Ejected | Extricated: No         | Air Bag: Non-Deployed Air Bag | Injury: No Apparent Injury (O) | Taken for Treatment: No |
|   | Injured Taken To: N/A                  |           | By: N/A   |                                 | EMS Notified Time:  | EMS Arrival Time:    | Hospital Arrival Time: |                               |                                |                         |
| 2 | Name (Last, First): SIMMONS, DEQUINCEY |           |           |                                 | Address: 2503 HIERS CT HEPHZIBAH (RICHMOND), GA 30815     |                      |                        |                               |                                |                         |
|   | Age: 51                                | Sex: Male | Unit #: 2 | Position: Front Seat-Left Side  | Safety Eq: Lap and Shoulder Belt Used                     | Ejected: Not Ejected | Extricated: No         | Air Bag: Non-Deployed Air Bag | Injury: No Apparent Injury (O) | Taken for Treatment: No |
|   | Injured Taken To: N/A                  |           | By: N/A   |                                 | EMS Notified Time:  | EMS Arrival Time:    | Hospital Arrival Time: |                               |                                |                         |
| 3 | Name (Last, First): LESTER, DOMINQUE   |           |           |                                 | Address: 2613 TEAKWOOD DR. HEPHZIBAH (RICHMOND), GA 30815 |                      |                        |                               |                                |                         |
|   | Age: 39                                | Sex: Male | Unit #: 2 | Position: Front Seat-Right Side | Safety Eq: Lap and Shoulder Belt Used                     | Ejected: Not Ejected | Extricated: No         | Air Bag: Non-Deployed Air Bag | Injury: No Apparent Injury (O) | Taken for Treatment: No |
|   | Injured Taken To: N/A                  |           | By: N/A   |                                 | EMS Notified Time:  | EMS Arrival Time:    | Hospital Arrival Time: |                               |                                |                         |
| 4 | Name (Last, First):                    |           |           |                                 | Address:  |                      |                        |                               |                                |                         |
|   | Age: 0                                 | Sex:      | Unit #: 0 | Position:                       | Safety Eq:  | Ejected:             | Extricated:            | Air Bag:                      | Injury:                        | Taken for Treatment:    |
|   | Injured Taken To:                      |           | By:       |                                 | EMS Notified Time:  | EMS Arrival Time:    | Hospital Arrival Time: |                               |                                |                         |

ADMINISTRATIVE

|   |                                      |   |
|---|--------------------------------------|---|
| Photos Taken: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | By:                                  | Officer Note: If collision resulted in a fatality, please send prompt notification to the GDOT Crash Reporting Unit via either email at GeorgiaFARS@dot.ga.gov or Fax at (404) 635-2963 |
| Report By: BACHAND, JESSE (C785)  | Agency: Richmond Co Sheriff's Office | Report Date: 9/28/2024 08:55  |
| Checked By: Benson, Chuck   |                                      | Date Checked: 9/30/2024   |

DEGRAAF CHIROPRACTIC ASSOCIATES INC.

2424 Peach Orchard Road • Augusta, GA 30906  
706.560.0180 • fax 706.560.0181 • degraff2@bellsouth.net

Exhibit D

To Whom it may Concern:

DeQuincey Simmons was seen in this office on 10/3/25 for treatment of a neuromuscular condition. If you have any further questions please feel free to contact us at the number listed above.

(Personal Health information is not available without written consent)

REMARKS:


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Thank you,

  
\_\_\_\_\_  
Signature

10/3/25

# AFTER VISIT SUMMARY

Dequincey Simmons MRN: 

 9/30/2025 9:00 AM  Piedmont Orthopedics - OrthoAtlanta Evans 706-620-3635

## Instructions from Jacob Goodrich



### Ambulatory referral to Pain Clinic (Aaron Sanders)

Address: 840 Stevens Creek Road AUGUSTA GA 30907  
Phone: 706-396-6389  
Specialty: Pain Medicine  
For: Lumbar radiculopathy

## Today's Visit



You saw Jacob Goodrich on Tuesday September 30, 2025 for: Follow Up and MRI Review of the Lower Back. The

following issue was addressed: Lumbar radiculopathy.



### Done Today

MRI comparison of outside films

## What's Next