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**Aug 27 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas  
Honorable Grace Gilchrist Knie, Circuit Court Judge

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Civil Action No. 2020-CP-42-02169

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Andrea Allen, as the Personal Representative of the Estate  
of Albert Charles Jefferies, deceased, ..... Respondent,

v.

Chi Hun Lim, M.D., Megan Nicholas, P.A., and Carolina  
Orthopaedic and Neurological Associates, PA ..... Appellants.

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**NOTICE OF APPEAL**

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Defendant Chi Hun Lim, M.D. (hereinafter “Appellant”) appeals: (1) the jury verdict and judgment entered thereon; (2) the evidentiary and other rulings adverse to Appellant before and during trial; (3) the Form 4 Order filed May 9, 2025, ruling on the Motion To Amend Answer, and (4) the Order filed July 28, 2025, ruling on post-trial motions. Copies of the Orders are attached hereto. Appellant received written notice of the order denying the post-trial motions on July 28, 2025.

*[Signature Page Follows]*

Respectfully submitted,

MURPHY & GRANTLAND, P.A.

By: s/Wesley B. Sawyer

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*Attorneys for Appellant Chi Hun Lim, M.D.*

Columbia, South Carolina

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**PROOF OF SERVICE**

This is to certify that the undersigned counsel has caused to be served this day the original **Notice of Appeal** via electronic mail to the address stated in the Supreme Court Order 2022-05-06-03 and in accordance with Rule 262, SCACR, and additionally via electronic mail to the following counsel of record in this matter as set forth below on the following page:

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<p>Patrick James McLaughlin, Esq.  Wukela Law Office  Post Office Box 13057  Florence, SC 29504  <a href="mailto:patrick@wukelalaw.com">patrick@wukelalaw.com</a></p> <p><i>Attorneys for Defendant Chi Hun Lim, M.D.</i></p>	<p>C. Mitchell Brown, Esq.  William C. Wood, Jr., Esq.  Nelson Mullins Riley &amp; Scarborough, LLP  PO Box 11070  Columbia, SC 29211  <a href="mailto:mitch.brown@nelsonmullins.com">mitch.brown@nelsonmullins.com</a>  <a href="mailto:bill.wood@nelsonmullins.com">bill.wood@nelsonmullins.com</a></p> <p><i>Attorneys for Defendant Meghan Nicholas, P.A.</i></p>
<p>Gregory Brown, Esq. Louise  Aponte, Esq.  Lowe Yeager Brown, PLLC  920 Volunteer Landing, Suite 200  Knoxville, TN 37915</p> <p>Adam Crittenden Bach, Esq. Emily R.  Godwin, Esq.  Tonnsen Bach, LLC 1306 S.  Church Street Greenville, SC  29605  <a href="mailto:abach@tonnsenbach.com">abach@tonnsenbach.com</a>  <a href="mailto:egodwin@tonnsenbach.com">egodwin@tonnsenbach.com</a></p> <p><i>Attorneys for Defendants Carolina Orthopedic and  Neurological Associates, ASC, LLC and  Carolina Orthopedic and Neurological  Associates, P.A.</i></p>	<p>Vordman Carlisle “Lyle” Traywick, III,  Esq. Rebecca Laffitte, Esq.  Robinson Gray Stepp &amp; Laffitte, LLC  PO Box 11449  Columbia, SC 29211  <a href="mailto:ltraywick@robinsongray.com">ltraywick@robinsongray.com</a>  <a href="mailto:blaffitte@robinsongray.com">blaffitte@robinsongray.com</a></p> <p><i>Attorneys for Defendant Carolina Orthopedic and  Neurological Associates, ASC, LLC</i></p>

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Columbia, South Carolina  
August 27, 2025

## Wesley B. Sawyer

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**From:** Wesley B. Sawyer  
**Sent:** Wednesday, August 27, 2025 4:14 PM  
**To:** gjowers@jjsjustice.com; ksuggs@jjsjustice.com; bat@jtbpa.com; adavis@davisnyder.com; rginty@davisnyder.com; John M. Grantland; Patrick McLaughlin; mitch.brown@nelsonmullins.com; bill.wood@nelsonmullins.com; abach@tonnsenbach.com; egodwin@tonnsenbach.com; ltraywick@robinsongray.com; blaffitte@robinsongray.com; Gray Culbreath; Jessica Laffitte; Jillian Hansen  
**Subject:** CONA, ASC, LLC v. Allen (2020CP4202169) - Notice of Appeal  
**Attachments:** Lim - Notice of Appeal.pdf; Proof of Service - Lim Notice of Appeal.PDF

Dear Counsel:

Pursuant to Rule 262(c)(3), SCACR, attached for service upon you is a Notice of Appeal, as well as a Proof of Service, being filed in the Court of Appeals of South Carolina this afternoon.

A copy of this email will be filed with the Proof of Service.

Should you have any questions or concerns, please don't hesitate to contact us.

Thank you,

Wes Sawyer



WESLEY B. SAWYER

Shareholder

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