

**RECEIVED**

**Sep 05 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Grace Knie, Circuit Judge  
Trial Court Case No. 2020-CP-42-02169

---

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

v.

Chi Hun Lim, M.D., Megan Nicholas, P.A., Carolina  
Orthopedic and Neurological Associates, ASC, LLC.....Defendants,

Of which Carolina Orthopedic and Neurological Associates, P.A. is..... Appellant.

---

**NOTICE OF APPEARANCE**

---

John S. Nichols hereby enters a Notice of Appearance as co-counsel for the Respondent  
Andrea Allen, in the above-mentioned matter.

**BLUESTEIN THOMPSON SULLIVAN, LLC**

/s/ John S. Nichols

John S. Nichols (SC Bar No. 4210)

1614 Taylor Street

Columbia, SC 29201

john@bluesteinattorneys.com

*Attorney for Respondent*

September 5, 2025

**RECEIVED**

**Sep 05 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Grace Knie, Circuit Court Judge

---

Case No. 2020-CP-42-02169

---

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

v.

Chi Hun Lim, M.D., Megan Nicholas, P.A., Carolina  
Orthopedic and Neurological Associates, ASC, LLC..... Defendants,

Of which Carolina Orthopedic and Neurological Associates, P.A. is..... Appellant.

---

**PROOF OF SERVICE**

---

I, the undersigned, certify that I have served all counsel in this action with a copy of the Notice of Appearance on behalf of John S. Nichols whom will be co-counsel for the Respondent, specified below by electronic mail to each attorney listed using their primary email address listed in the Attorney Information System.

Gerald D. Jowers, Jr. Esq.  
Kenneth M. Suggs, Esq.  
Janet, Janet & Suggs, LLC  
801 Gervais St.  
Ste. B  
Columbia, SC 29201  
[gjowers@jjsjustice.com](mailto:gjowers@jjsjustice.com)  
[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)

Matthew Macklin White, Esq.  
8801 Fircrest Pl.  
Alexandria, VA 22308  
[mattmwhite@gmail.com](mailto:mattmwhite@gmail.com)

***Attorneys for Respondent***

Adam C. Bach, Esq.  
Emily R. Godwin, Esq.  
Tonnsen Bach, LLC  
1306 S. Church St  
Greenville, SC 29605  
[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)  
[egodwin@tonnsenbach.com](mailto:egodwin@tonnsenbach.com)

Gregory Brown, Esq. (admitted Pro Hac Vice)  
Louise Aponte, Esq. (admitted Pro Hac Vice)  
[gb@lyblaw.net](mailto:gb@lyblaw.net)  
Lowe Yeager Brown, PLLC  
920 Volunteer Landing, Ste 200  
Knoxville, TN 37915

***Attorneys for Carolina Orthopaedic and Neurological Associates, P.A.; Carolina  
Orthopedic and Neurological Associates, A.S.C., LLC***

Gray Culbreath, Esq.  
Jessica W. Laffitte, Esq.  
Gallivan, White & Boyd, PA  
PO Box 7368  
Columbia, SC 29202  
[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)  
[jlaffitte@gwblawfirm.com](mailto:jlaffitte@gwblawfirm.com)

***Attorneys for Carolina Orthopaedic and Neurological Associates, PA***

Vordman Carlisle Traywick, III, Esq.  
Rebecca Laffitte, Esq.  
Robinson Gray Stepp & Laffitte, LLC  
PO Box 11449  
Columbia, SC 29211  
[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)  
[rlaffitte@robinsongray.com](mailto:rlaffitte@robinsongray.com)

***Attorneys for Carolina Orthopaedic and Neurological Associates, ASC., LLC***

Matthew H. Henrikson, Esq.  
Henrikson Law Firm, LLC  
PO Box 26554  
Greenville, SC 29616  
[mhenrikson@henriksonlaw.com](mailto:mhenrikson@henriksonlaw.com)

***Attorney for Alfred Ezman, M.D.***

John M. Grantland, Esq.  
Wesley Brian Sawyer, Esq.  
Murphy & Grantland, PA  
PO Box 6648  
Columbia, SC 29260  
[jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com)  
[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)

Patrick J. McLaughlin, Esq.  
Wukela Law Office  
PO Box 13057  
Florence, SC 29504  
[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)

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

C. Mitchell Brown, Esq.  
William C. Wood, Jr., Esq.  
Nelson Mullins Riley & Scarborough, LLP  
PO Box 11070  
Columbia, SC 29211  
[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)  
[bill.wood@nelsonmullins.com](mailto:bill.wood@nelsonmullins.com)

***Attorney for Megan Nicholas, P.A.***

Ashby W. Davis, Esq.  
Ryan J. Ginty, Esq.  
Davis and Snyder, P.A.  
5 Hawthorne Park Court  
Greenville, SC 29615  
[adavis@davissnyder.com](mailto:adavis@davissnyder.com)  
[rginty@davissnyder.com](mailto:rginty@davissnyder.com)

***Attorneys for All Defendants***

September 5, 2025



---

Meredith Brown, Legal Assistant to  
John S. Nichols

## Meredith Brown

---

**From:** Meredith Brown  
**Sent:** Friday, September 5, 2025 12:14 PM  
**To:** John Nichols; gjowers@jjsjustice.com; Kenneth M. Suggs; mattmwhite@gmail.com; abach@tonnsenbach.com; egodwin@tonnsenbach.com; 'gculbreath@gwblawfirm.com'; jlaffitte@gwblawfirm.com; ltraywick@robinsongrey.com; blaffitte@robinsongrey.com; mhenrikson@henriksonlaw.com; 'John M. Grantland'; wsawyer@murphygrantland.com; patrick@wukelalaw.com; mitch.brown@nelsonmullins.com; bill.wood@nelsonmullins.com; adavis@davisnyder.com; rginty@davisnyder.com; gb@lyblaw.net  
**Subject:** Case No: 2020-CP-42-02169- Notice of Appearance  
**Attachments:** 2025.09.05- Notice of Appearance.pdf  
**Categories:** Smokeball

Dear Counsel,

Please find enclosed the Notice of Appearance for John S. Nichols as co-counsel for Respondent Andrea Allen, in the above referenced matter.

Thank you,  
Meredith

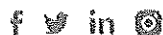


**MEREDITH BROWN OFFICE MANAGER &  
LEGAL ASSISTANT TO JOHN S. NICHOLS**

1614 TAYLOR STREET | PO BOX 7965  
COLUMBIA, SOUTH CAROLINA 29202  
O: 803.779.7599 F: 803.771.8097

[MEREDITH@BLUESTEINATTORNEYS.COM](mailto:MEREDITH@BLUESTEINATTORNEYS.COM)

[BLUESTEINATTORNEYS.COM](http://BLUESTEINATTORNEYS.COM)



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.

## Meredith Brown

---

**From:** Meredith Brown  
**Sent:** Friday, September 5, 2025 12:22 PM  
**To:** ltraywick@robinsongray.com; rlaffitte@robinsongray.com  
**Cc:** John Nichols  
**Subject:** FW: Case No: 2020-CP-42-02169- Notice of Appearance  
**Attachments:** 2025.09.05- Notice of Appearance.pdf  
  
**Categories:** Smokeball

Dear Counsel,

Please see the below original email and attachment of the Notice of Appearance for John S. Nichols as co-counsel for Respondent Andrea Allen, in the above- referenced matter.

The original sent email was returned to me for a typo- error on my part.

Thank you,  
Meredith

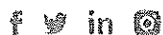


**MEREDITH BROWN OFFICE MANAGER &  
LEGAL ASSISTANT TO JOHN S. NICHOLS**

1614 TAYLOR STREET | PO BOX 7965  
COLUMBIA, SOUTH CAROLINA 29202  
O: 803.779.7599 F: 803.771.8097

[MEREDITH@BLUESTEINATTORNEYS.COM](mailto:MEREDITH@BLUESTEINATTORNEYS.COM)

[BLUESTEINATTORNEYS.COM](http://BLUESTEINATTORNEYS.COM)



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.

**From:** Meredith Brown  
**Sent:** Friday, September 5, 2025 12:14 PM  
**To:** John Nichols <john@bluesteinattorneys.com>; gjowers@jjsjustice.com; Kenneth M. Suggs <ksuggs@jjsjustice.com>; mattmwhite@gmail.com; abach@tonnsenbach.com; egodwin@tonnsenbach.com; 'gculbreath@gwblawfirm.com' <gculbreath@gwblawfirm.com>; jlaffitte@gwblawfirm.com; ltraywick@robinsongrey.com; blaffitte@robinsongrey.com;

mhenrikson@henriksonlaw.com; 'John M. Grantland' <jgrantland@murphygrantland.com>;  
wsawyer@murphygrantland.com; patrick@wukelalaw.com; mitch.brown@nelsonmullins.com;  
bill.wood@nelsonmullins.com; adavis@davissnyder.com; rginty@davissnyder.com; gb@lyblaw.net  
**Subject:** Case No: 2020-CP-42-02169- Notice of Appearance

Dear Counsel,

Please find enclosed the Notice of Appearance for John S. Nichols as co-counsel for Respondent Andrea Allen, in the above referenced matter.

Thank you,  
Meredith



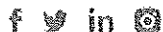
**MEREDITH BROWN OFFICE MANAGER &  
LEGAL ASSISTANT TO JOHN S. NICHOLS**

1614 TAYLOR STREET | PO BOX 7965  
COLUMBIA, SOUTH CAROLINA 29202

O: 803.779.7599 F: 803.771.8097

[MEREDITH@BLUESTEINATTORNEYS.COM](mailto:MEREDITH@BLUESTEINATTORNEYS.COM)

[BLUESTEINATTORNEYS.COM](http://BLUESTEINATTORNEYS.COM)



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.

September 5, 2025

**RECEIVED**

**Sep 05 2025**

**SC Court of Appeals**

VIA ELECTRONIC MAIL (ctappfilings@sccourts.org)

The Hon. Jenny A. Kitchings  
Clerk of the Court of Appeals  
Court of Appeals of South Carolina  
1220 Gervais Street  
Columbia, SC 29201

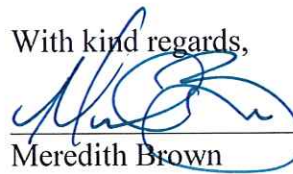
RE: Andrea Allen, as Personal Representative of the Estate of Albert Charles Jeffries, Respondent, vs. Chi Hun Lim, M.D., Megan Nicholas, P.A., Carolina Orthopedic and Neurological Associates, ASC, LLC, Defendants, Of which Carolina Orthopedics and Neurological Associates, P.A. is, Appellant.  
Circuit Court Case No: 2020-CP-42-02169

Dear Ms. Kitchings:

I have enclosed for filing a Notice of Appearance for John S. Nichols, Esq. as co-counsel for the Respondent, along with the Proof of Service.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions or need any additional information.

With kind regards,



Meredith Brown

Legal Assistant to John S. Nichols, Esq.

Enclosures as Stated

cc: John S. Nichols, Esq. ([john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com))  
Gerald D. Jowers, Esq. ([gjowers@jjsjustice.com](mailto:gjowers@jjsjustice.com))  
Kenneth M. Suggs, Esq. ([ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com))  
Matthew M. White, Esq. ([mattmwhite@gmail.com](mailto:mattmwhite@gmail.com))  
Adam C. Bach, Esq. ([abach@tonnsenbach.com](mailto:abach@tonnsenbach.com))  
Emily R. Godwin, Esq. ([egodwin@tonnsenbach.com](mailto:egodwin@tonnsenbach.com))

Gray Cubreath, Esq. ([gcubreath@gwblawfirm.com](mailto:gcubreath@gwblawfirm.com))  
Jessica W. Laffitte, Esq. ([jlaffitte@gwblawfirm.com](mailto:jlaffitte@gwblawfirm.com))  
Vordman Carlisle Traywick, III, Esq. ([ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com))  
Rebecca Laffitte, Esq. ([rlaffitte@robinsongray.com](mailto:rlaffitte@robinsongray.com))  
Matthew Henrikson, Esq. ([mhenrikson@henriksonlaw.com](mailto:mhenrikson@henriksonlaw.com))  
John M. Grantland, Esq. ([jgrantland@murphygrantland.com](mailto:jgrantland@murphygrantland.com))  
Wesley B. Sawyer, Esq. ([wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com))  
Patrick J. McLaughlin, Esq. ([patrick@wukelalaw.com](mailto:patrick@wukelalaw.com))  
C. Mitchell Brown, Esq. ([mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com))  
William C. Wood, Jr., Esq. ([bill.wood@nelsonmullins.com](mailto:bill.wood@nelsonmullins.com))  
Ashby W. Davis, Esq. ([adavis@davissnyder.com](mailto:adavis@davissnyder.com))  
Ryan J. Ginty, Esq. ([rginty@davissnyder.com](mailto:rginty@davissnyder.com))  
Gregory Brown, Esq. ([gb@lyblaw.net](mailto:gb@lyblaw.net))  
Louise Aponte, Esq.