

December 17, 2025

**VIA EMAIL ONLY**

Ms. Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**Dec 17 2025**  
**SC Court of Appeals**

Re: *Carolina Orthopedic and Neurological Associates, P.A. v. Andrea Allen,  
as the Personal Representative of the Estate of Albert Charles Jeffries*  
Appellate Case No. 2025-001716  
GWB File No. 11373-2

Dear Ms. Kitchings:

In response to the Court's correspondence regarding transcript delivery in the above-captioned appeal, please be advised that **the transcript requested on October 13, 2025 was received by our office today, December 17, 2025** after we followed up with the court reporter upon receipt of the Court's correspondence.

Counsel for Appellant CONA, P.A. would show that the court reporter confirmed the transcript was in progress on or about October 13, 2025 following a duplicate request from another law firm. The court reporter further advised that a copy of the transcript would be provided upon completion; however, due to an apparent miscommunication, our office was never provided a copy of the transcript. As noted above, our office contacted the court reporter this morning upon receipt of the Court's correspondence, and thereafter, the transcript was delivered.

A courtesy copy of electronic communications with the court reporter, pursuant to Rule 207(a), SCACR, and a corresponding Proof of Service are submitted herewith for filing in accordance with Supreme Court Order 2022-05-06-03 and Rule 262, SCACR.

We appreciate your patience and understanding, and we offer our apologies for the delay in informing the Court. Please feel free to contact me should you have any questions.

*[Signature page follows]*

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

A handwritten signature in blue ink, appearing to read "Jessica W. Laffitte".

Jessica W. Laffitte

JWL/jh

Enclosures: As Stated

cc: All Counsel of Record (*via email only*)

**From:** info <[info@legaleagleinc.com](mailto:info@legaleagleinc.com)>

**Date:** October 13, 2025 at 1:25:03 PM EDT

**To:** Jessica Laffitte <[jlaffitte@gwblawfirm.com](mailto:jlaffitte@gwblawfirm.com)>

**Cc:** info <[info@legaleagleinc.com](mailto:info@legaleagleinc.com)>, Transcripts <[transcripts@sccourts.org](mailto:transcripts@sccourts.org)>, Velvet Mills <[vmills@legaleagleinc.com](mailto:vmills@legaleagleinc.com)>

**Subject:** Andrea Allen v. Chi Hun Lim, MD, Megan Nicholas, PA, et al. 8-27-25  
Transcript

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Jessia,

Today, Legal Eagle was assigned your transcript copy request in the above referenced matter. This transcript is in production from another party and is due for completion on October 23rd. We will email you a copy at \$1.00 per page once it has been completed. Please let us know if you have any questions.

Thank you,



**Kevin Dehlinger**

Director of Operations

**M** (864) 444-4219 | **P** (864) 467-1373

**E** [kdehlinger@legaleagleinc.com](mailto:kdehlinger@legaleagleinc.com)

107 LeGrand Blvd., Greenville, SC 29607  
[www.LegalEagleInc.com](http://www.LegalEagleInc.com)





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**From:** Kevin Dehlinger <kdehlinger@LegalEagleInc.com>  
**Sent:** Wednesday, December 17, 2025 10:38 AM  
**To:** Jillian Hansen  
**Cc:** info  
**Subject:** Allen v Lim 8-27-25 Transcript  
**Attachments:** Invoice 108284.pdf; ALLEN V LIM 8-27-25.pdf

**CAUTION: EXTERNAL EMAIL ORIGINATING OUTSIDE OF GWB's EMAIL SYSTEM**

Ms. Hansen,

Thank you for your call today. Attached are the transcript and invoice for this hearing. If you have any questions, please let us know.



**Kevin Dehlinger**  
Director of Operations

**M** (864) 444-4219 | **P** (864) 467-1373  
**E** [kdehlinger@legaleagleinc.com](mailto:kdehlinger@legaleagleinc.com)

107 LeGrand Blvd., Greenville, SC 29607  
[www.LegalEagleInc.com](http://www.LegalEagleInc.com)



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**Dec 17 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

Grace Knie, Circuit Court Judge

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Case No. 2020-CP-42-02169  
Appellate Case No. 2025-001716

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

v.

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

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**PROOF OF SERVICE**

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This is to certify that the undersigned counsel has caused to be served this day the  
**Correspondence regarding Transcript Delivery** 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 on the following  
page:

<p>Gerald Drayton Jowers, Jr., Esq. Kenneth M. Suggs, Esq. Janet, Janet &amp; Suggs, LLC 801 Gervais Street, Suite B Columbia, SC 29201 <a href="mailto:gjowers@jjsjustice.com">gjowers@jjsjustice.com</a> <a href="mailto:ksuggs@jjsjustice.com">ksuggs@jjsjustice.com</a></p> <p>Luther J. Battiste, III, Esq. Johnson, Toal &amp; Battiste, P.A. 1615 Barnwell Street Columbia, SC 29202 <a href="mailto:bat@jtbpa.com">bat@jtbpa.com</a></p> <p>John S. Nichols, Esq. Bluestein Thompson Sullivan, LLC 1614 Taylor Street Columbia, SC 29201 <a href="mailto:john@bluesteinattorneys.com">john@bluesteinattorneys.com</a></p> <p><b><i>Attorneys for Plaintiff/Respondent Andrea Allen, as the Personal Representative of the Estate of Albert Charles Jeffries</i></b></p>	<p>Ashby W. Davis, Esq. Ryan Justin Ginty, Esq. Davis and Snyder, P.A. 5 Hawthorne Park Court Greenville, SC 29615 <a href="mailto:adavis@davisnyder.com">adavis@davisnyder.com</a> <a href="mailto:rginty@davisnyder.com">rginty@davisnyder.com</a></p> <p><b><i>Attorneys for All Defendants</i></b></p>
<p>John Martin Grantland, Esq. Wesley B. Sawyer, Esq. Murphy &amp; Grantland, P.A. PO Box 6648 Columbia, SC 29260 <a href="mailto:jgrantland@murphygrantland.com">jgrantland@murphygrantland.com</a> <a href="mailto:wsawyer@murphygrantland.com">wsawyer@murphygrantland.com</a></p> <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><b><i>Attorneys for Defendant Chi Hun Lim, M.D.</i></b></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><b><i>Attorneys for Defendant Meghan Nicholas, P.A.</i></b></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><b><i>Attorneys for Defendants Carolina Orthopedic and Neurological Associates, ASC, LLC and Carolina Orthopedic and Neurological Associates, P.A.</i></b></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><b><i>Attorneys for Defendant Carolina Orthopedic and Neurological Associates, ASC, LLC</i></b></p>

A copy of the email serving the aforementioned to all counsel of record is attached hereto.

Respectfully submitted,

s/Jessica W. Laffitte

Gray T. Culbreath (SC Bar No. 11907)

Jessica W. Laffitte (SC Bar No. 100256)

GALLIVAN WHITE & BOYD, P.A.

Post Office Box 7368

1201 Main Street, Suite 1200

Columbia, South Carolina 29201

[GCulbreath@gwblawfirm.com](mailto:GCulbreath@gwblawfirm.com)

[JLaffitte@gwblawfirm.com](mailto:JLaffitte@gwblawfirm.com)

***Attorneys for Appellant Carolina Orthopedic and  
Neurological Associates, P.A.***

December 17, 2025

## Jillian Hansen

---

**From:** Jillian Hansen  
**Sent:** Wednesday, December 17, 2025 11:47 AM  
**To:** 'gjowers@jjsjustice.com'; 'ksuggs@jjsjustice.com'; 'bat@jtbpa.com'; 'john@bluesteinattorneys.com'; 'adavis@davissnyder.com'; 'rginty@davissnyder.com'; 'jgrantland@murphygrantland.com'; 'wsawyer@murphygrantland.com'; 'patrick@wukelalaw.com'; 'mitch.brown@nelsonmullins.com'; 'bill.wood@nelsonmullins.com'; 'abach@tonnsenbach.com'; 'egodwin@tonnsenbach.com'; 'ltraywick@robinsongray.com'; 'blaffitte@robinsongray.com'  
**Cc:** Gray Culbreath; Jessica Laffitte  
**Subject:** 11373-2 Allen v. Lim, et al. - Transcript Delivery  
**Attachments:** [FINAL] Ltr to SC CoA re Transcript Delivery 12-17-25.pdf; [FINAL] Proof of Service - Correspondence re Transcript Delivery.pdf  
  
**Categories:** GTC

Good morning,

Attached hereto and served upon you, please find correspondence from Jessica Laffitte, Esq. on behalf of Appellant CONA, P.A. which will be submitted to the South Carolina Court of Appeals today. A copy of this message will be affixed to the Proof of Service, which will also be submitted today.

Kind regards,  
Jillian



**RECEIVED**  
**Dec 17 2025**  
**SC Court of Appeals**

**Jillian Hansen**  
Paralegal  
jhansen@gwblawfirm.com

**Gallivan, White & Boyd P.A.**  
1201 Main Street | Suite 1200 | Columbia SC 29201  
803 724 1702 Direct | 803 779 1833 Main | 803 779 1767 Fax  
**Mailing** Post Office Box 7368 | Columbia SC 29202

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