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**Feb 11 2026**

**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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**PETITION FOR SUBSTITUTION OF COUNSEL**

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Pursuant to Rule 264 of the South Carolina Appellate Court Rules, Gray T. Culbreath, Esq. and Jessica W. Laffitte, Esq. of the law firm Gallivan, White & Boyd, P.A. hereby respectfully request that they be discharged and relieved of their duties as counsel of record for Carolina Orthopaedic and Neurosurgical Associates, P.A.; and further, that Stephen P. Groves, Esq. and the law firm of Butler Snow, LLP be substituted as counsel of record for Carolina Orthopaedic and Neurosurgical Associates, P.A. in the above-captioned matter.

This petition is based upon Appellant Carolina Orthopedic and Neurological Associates, P.A.’s desire to retain Stephen P. Groves, Esq. and the law firm of Butler Snow, LLP as counsel for the purposes of this appeal. All counsel of record in this appeal have been provided notice of this petition pursuant to Rule 264, SCACR, and have consented to same (**Exhibit A**). Further, a

client representative for Carolina Orthopedic and Neurological Associates, P.A. has been provided notice of this petition pursuant to Rule 264, SCACR, and has consented to same (**Exhibit B**).

Therefore, Carolina Orthopedic and Neurological Associates, P.A. hereby petitions this Court for an Order substituting Stephen P. Groves, Esq. and the law firm of Butler Snow, LLP as its counsel for purposes of this appeal.

Further, Carolina Orthopedic and Neurological Associates, P.A. respectfully requests that Gray T. Culbreath, Esq. and Jessica W. Laffitte, Esq. of the law firm of Gallivan, White & Boyd, P.A. be discharged and relieved of their duties as counsel of record; that they be removed from all pleadings and communications regarding this matter; and that all future correspondence, pleadings, and discovery be served instead upon Stephen P. Groves, Esq. and the law firm of Butler Snow, LLP as counsel for Carolina Orthopedic and Neurological Associates, P.A. in this matter.

Respectfully submitted,

s/Gray T. Culbreath

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)

-and-

s/Stephen P. Groves, Sr.

Stephen P. Groves, Sr. (SC Bar No. 7854)  
BUTLER SNOW, LLP  
25 Calhoun Street, Suite 250  
Charleston, SC 29401  
[stephen.groves@butlersnow.com](mailto:stephen.groves@butlersnow.com)

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

February 11, 2026

## Jillian Hansen

---

**From:** Gray Culbreath  
**Sent:** Thursday, January 29, 2026 10:42 AM  
**To:** Jillian Hansen  
**Subject:** FW: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

**Categories:** GTC



**Gray T. Culbreath**  
Partner  
[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)

**Gallivan, White & Boyd P.A.**  
1201 Main Street | Suite 1200 | Columbia SC 29201  
803 724 1850 Direct | 803 779 1833 Main | 803 779 1767 Fax  
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**From:** Mitch Brown <[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)>  
**Sent:** Thursday, January 29, 2026 10:07 AM  
**To:** Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>  
**Subject:** Re: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

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On Jan 29, 2026, at 10:06 AM, Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)> wrote:

Consent?

**Gray T. Culbreath**

Partner  
[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)

**Gallivan, White & Boyd P.A.**  
1201 Main Street | Suite 1200 | Columbia SC 29201  
803 724 1850 Direct | 803 779 1833 Main | 803 779 1767 Fax  
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**From:** Wesley B. Sawyer <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>  
**Sent:** Tuesday, January 27, 2026 3:37 PM  
**To:** Kenneth M. Suggs <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>; Luther Battiste <[bat@jtbpa.com](mailto:bat@jtbpa.com)>; Ashby Davis <[ADavis@davissnyder.com](mailto:ADavis@davissnyder.com)>; Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>; [mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com); Patrick McLaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>; Adam Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>; [Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)  
**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>; Louise Aponte <[lma@lyb.law](mailto:lma@lyb.law)>; [gb@lyb.law](mailto:gb@lyb.law); Jillian Hansen <[jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)>  
**Subject:** RE: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

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I consent

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**From:** Kenneth M. Suggs <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>  
**Sent:** Tuesday, January 27, 2026 3:35 PM  
**To:** Luther Battiste <[bat@jtbpa.com](mailto:bat@jtbpa.com)>; Ashby Davis <[ADavis@davissnyder.com](mailto:ADavis@davissnyder.com)>; Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>; [mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com); Patrick McLaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>; Wesley B. Sawyer <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>; Adam Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>; [Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)  
**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>; Louise Aponte <[lma@lyb.law](mailto:lma@lyb.law)>; [gb@lyb.law](mailto:gb@lyb.law); [jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)  
**Subject:** Re: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

I consent

Kenneth M. Suggs  
801 Gervais St., Suite B  
Columbia SC 29201  
410-653-3200  
Cell: 803-260-1295

---

**From:** "Luther J Battiste III (E-mail)" <[bat@jtbpa.com](mailto:bat@jtbpa.com)>  
**Date:** Tuesday, January 27, 2026 at 3:32 PM  
**To:** Ashby Davis <[ADavis@davissnyder.com](mailto:ADavis@davissnyder.com)>, Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>, Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>, "Kenneth M. Suggs" <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>, "[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)" <[mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)>, Patrick McLaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>, "Wesley B. Sawyer" <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>, Adam Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>, "[Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)" <[Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)>

**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>, Louise Aponte <[lma@lyb.law](mailto:lma@lyb.law)>, "[gb@lyb.law](mailto:gb@lyb.law)" <[gb@lyb.law](mailto:gb@lyb.law)>, "[jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)" <[jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)>

**Subject:** RE: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

I consent.

**Luther J. Battiste, III, Esquire**

Johnson, Toal & Battiste, P.A.

P.O. Box 1431

Columbia, South Carolina 29202

Phone: (803) 252-9700

Fax: (803) 252-9102

[bat@jtbpa.com](mailto:bat@jtbpa.com)

**Visit Us At** [www.jtblawfirm.com](http://www.jtblawfirm.com)

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<image002.png>

<image003.png>

<image004.jpg>

<image005.png>

---

**From:** Ashby Davis <[ADavis@davissnyder.com](mailto:ADavis@davissnyder.com)>

**Sent:** Tuesday, January 27, 2026 2:51 PM

**To:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>; Kenneth M. Suggs <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>; Luther Battiste <[bat@jtbpa.com](mailto:bat@jtbpa.com)>; [mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com); Patrick Mclaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>; Wesley B. Sawyer <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>; Adam Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>; [Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)

**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>; Louise Aponte <[lma@lyb.law](mailto:lma@lyb.law)>; [gb@lyb.law](mailto:gb@lyb.law); [jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)

**Subject:** RE: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

I consent.

Ashby Davis

---

**From:** Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>

**Sent:** Tuesday, January 27, 2026 12:47 PM

**To:** Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>; Kenneth M. Suggs <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>; [BAT@jtbpa.com](mailto:BAT@jtbpa.com); [mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com); Ashby Davis <[ADavis@davissnyder.com](mailto:ADavis@davissnyder.com)>; Patrick Mclaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>; Wesley B. Sawyer <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>; Adam Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>; [Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)

**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>; Louise Aponte <[lma@lyb.law](mailto:lma@lyb.law)>; [gb@lyb.law](mailto:gb@lyb.law); [jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)

**Subject:** RE: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

We consent. Thanks, Gray.

Lisle

<image006.png>

<image007.gif>  
**VORDMAN CARLISLE TRAYWICK, III MEMBER**  
DIRECT 803.231.7810 2151 Pickens Street  
[VCARD](#) [VIEW BIO](#) Suite 500  
[ROBINSONGRAY.COM](#) PO Box 11449 (29211)  
Columbia, SC 29201

<image008.png>

<image010.jpg>

<image009.jpg>

<image011.jpg>

<image012.jpg>

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**From:** Gray Culbreath <[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)>  
**Sent:** Tuesday, January 27, 2026 12:25 PM  
**To:** Kenneth M. Suggs <[ksuggs@jjsjustice.com](mailto:ksuggs@jjsjustice.com)>; [BAT@jtbp.com](mailto:BAT@jtbp.com); [mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com);  
Lisle Traywick <[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)>; Ashby Davis <[adavis@davissnyder.com](mailto:adavis@davissnyder.com)>; Patrick  
Mclaughlin <[patrick@wukelalaw.com](mailto:patrick@wukelalaw.com)>; Wesley B. Sawyer <[wsawyer@murphygrantland.com](mailto:wsawyer@murphygrantland.com)>; Adam  
Bach <[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)>; [Stephen.Groves@butlersnow.com](mailto:Stephen.Groves@butlersnow.com)  
**Cc:** Elsa Cruz <[ecruz@gwblawfirm.com](mailto:ecruz@gwblawfirm.com)>; Louise Aponte <[ima@lyb.law](mailto:ima@lyb.law)>; [gb@lyb.law](mailto:gb@lyb.law);  
[jhansen@gwblawfirm.com](mailto:jhansen@gwblawfirm.com)  
**Subject:** Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

Dear counsel,

I am writing to advise that Gallivan White and Boyd will be moving to withdraw as counsel for CONA, PA, in the above-captioned matter. Stephen Groves of Butler Snow will take over the representation of CONA, PA.

Please advise as to whether you consent to this substitution of counsel.

---

**Gray T. Culbreath**  
Partner  
[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)  
**Gallivan, White & Boyd P.A.**

1201 Main Street | Suite 1200 | Columbia SC 29201  
803 724 1850 Direct | 803 779 1833 Main | 803 779 1767 Fax  
**Mailing** Post Office Box 7368 | Columbia SC 29202

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## Jillian Hansen

---

**From:** Louise Aponte <lma@lyb.law>  
**Sent:** Friday, February 6, 2026 12:16 PM  
**To:** Gray Culbreath; Greg Brown  
**Cc:** Jillian Hansen; Elsa Cruz  
**Subject:** Re: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

**Categories:** GTC

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Gray,

Yes, CONA PA consents to the substitution of counsel.

All the best,

Louise M. Aponte  
Attorney



**LOWE  
YEAGER  
BROWN PLLC**

920 Volunteer Landing, Suite 200  
Knoxville, TN 37915  
Direct/Text: 865.316.9554  
Main: 865.521.6527 | Fax: 865.637.0540

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**From:** Gray Culbreath <gculbreath@gwblawfirm.com>  
**Date:** Friday, February 6, 2026 at 10:44 AM  
**To:** Greg Brown <gb@lyb.law>  
**Cc:** Louise Aponte <lma@lyb.law>, Jillian Hansen <jhansen@gwblawfirm.com>, Elsa Cruz <ecruz@gwblawfirm.com>  
**Subject:** RE: Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

Following up on this



**Gray T. Culbreath**

Partner  
[gculbreath@gwblawfirm.com](mailto:gculbreath@gwblawfirm.com)

**Gallivan, White & Boyd P.A.**  
1201 Main Street | Suite 1200 | Columbia SC 29201  
803 724 1850 Direct | [803 779 1833](tel:8037791833) Main | 803 779 1767 Fax  
**Mailing** Post Office Box 7368 | Columbia SC 29202

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**From:** Gray Culbreath  
**Sent:** Monday, January 26, 2026 1:57 PM  
**To:** gb@lyb.law  
**Cc:** Louise Aponte <lma@lyb.law>; Jillian Hansen <jhansen@gwblawfirm.com>; Elsa Cruz <ecruz@gwblawfirm.com>  
**Subject:** Allen v. Lim - Appellate Case No. 2025-001716 Substitution of counsel

Dear Greg,

As you know, we were retained by MagMutual to represent the interests of CONA, PA, in the appeal of the above-captioned matter. MagMutual has determined that our firm should be replaced because of concern over a potential conflict with Dr. Lim's counsel. As a result, they have engaged Stephen Groves of the firm Butler Snow to undertake the representation of CONA, PA, in this appeal. Louise and I discussed this last week.

Please advise whether CONA, PA, will consent to this substitution.

I look forward to hearing from you.



**Gray T. Culbreath**

Partner

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

**Gallivan, White & Boyd P.A.**

1201 Main Street | Suite 1200 | Columbia SC 29201

803 724 1850 Direct | [803 779 1833](tel:8037791833) Main | 803 779 1767 Fax

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**Feb 11 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace Knie, Circuit Court Judge

---

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

---

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.

---

**PROOF OF SERVICE**

---

This is to certify that the undersigned counsel has caused to be served this day the original  
**Petition for Substitution of Counsel** 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/Gray T. Culbreath

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)

-and-

s/Stephen P. Groves, Sr.

Stephen P. Groves, Sr. (SC Bar No. 7854)  
BUTLER SNOW, LLP  
25 Calhoun Street, Suite 250  
Charleston, SC 29401  
[stephen.groves@butlersnow.com](mailto:stephen.groves@butlersnow.com)

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

February 11, 2026

## Jillian Hansen

---

**From:** Jillian Hansen  
**Sent:** Wednesday, February 11, 2026 11:39 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; 'Stephen Groves'  
**Subject:** RE: 11373-2 Allen v. Lim, et al. - Petition for Substitution of Counsel  
**Attachments:** Ex. A - Notice of Intent to & Consent by All Counsel.pdf; Ex. B - Consent by Client.pdf  
**Categories:** GTC

Good morning,

My apologies for the double message – attached please find the Exhibits A and B to the previously circulated Petition.

Kind regards,  
Jillian



**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  
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## Jillian Hansen

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**From:** Jillian Hansen  
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**Cc:** Gray Culbreath; Jessica Laffitte; Stephen Groves  
**Subject:** 11373-2 Allen v. Lim, et al. - Petition for Substitution of Counsel  
**Attachments:** [FINAL] Petition for Substitution of Counsel.pdf; [FINAL] Proof of Service - Substitution of Counsel.pdf  
**Categories:** GTC

Good morning,

Attached hereto and served upon you, please find Appellant CONA, P.A.'s Petition for Substitution of Counsel 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**

**Feb 11 2026**

**SC Court of Appeals**



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

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February 11, 2026

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**Feb 11 2026**  
**SC Court of Appeals**

**VIA HAND DELIVERY**

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

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:

Enclosed herewith, please find courtesy copies of Appellant Carolina Orthopedic and Neurological Associates, P.A.'s Petition for Substitution of Counsel pursuant to Rule 264, SCACR as well as its corresponding Proof of Service. These documents have already been submitted for electronic filing in accordance with Supreme Court Order 2022-05-06-03 and Rule 262, SCACR.

Also enclosed is my firm's check in the amount of Fifty and No/100 Dollars (\$50.00) for payment of the associated filing fee.

Please feel free to contact me should you have any questions.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Gray T. Culbreath

GTC/jh  
Enclosures: As Stated

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