

**RECEIVED**

**Feb 18 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.

---

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT CAROLINA  
ORTHOPEDIC AND NEUROLOGICAL ASSOCIATES, P.A.’S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

---

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant Carolina Orthopedic and Neurological Associates, P.A. (hereinafter “Appellant CONA, PA”) respectfully requests a thirty (30) day extension to file its initial brief and designation of matter. This is Appellant CONA, PA’s first request for an extension of these deadlines. Appellant CONA, PA respectfully requests this extension on the grounds that it is currently in the process of substituting its counsel, as evidenced by its February 11, 2026 Petition for Substitution of Counsel previously filed in this action.

The current deadline for Appellant CONA, PA to file its initial brief and designation of matter is February 25, 2026. Should this Court grant the instant request for a thirty (30) day

extension, Appellant CONA, PA's initial brief and designation of matter would be due on March 27, 2026. Appellant CONA, PA requests that the current deadline of February 25, 2026 be held in abeyance pending the Court's consideration and resolution of this Motion.

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)

***Attorneys for Appellant Carolina Orthopedic and  
Neurological Associates, P.A.***  
*(withdrawal & relief as counsel pending)*

-and-

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)

***Attorney for Appellant Carolina Orthopedic and  
Neurological Associates, P.A.***  
*(substitution as counsel pending)*

February 18, 2026

**RECEIVED**  
**Feb 18 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 **Motion for Extension of Time to File Appellant Carolina Orthopedic and Neurological Associates, P.A.’s Initial Brief and Designation of Matter** 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)

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

*(withdrawal & relief as counsel pending)*

-and-

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)

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

*(substitution as counsel pending)*

February 18, 2026

## Jillian Hansen

---

**From:** Jillian Hansen  
**Sent:** Wednesday, February 18, 2026 2:47 PM  
**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:** 11373-2 Allen v. Lim, et al. - Motion for Extension of Time  
**Attachments:** [FINAL] Motion for Extension of Time - Initial Brief & DOM.pdf; [FINAL] Proof of Service - Motion for Extension.pdf  
  
**Categories:** GTC

Good afternoon,

Attached hereto and served upon you, please find Appellant CONA, P.A.'s Motion for Extension of Time to File Initial Brief and Designation of Matter 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 18 2026**  
**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

[vCard](#) | [BioURL](#) | [Website](#)

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

February 18, 2026

**VIA HAND DELIVERY**

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

**RECEIVED**

**Feb 18 2026**

**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:

Enclosed herewith, please find courtesy copies of Appellant Carolina Orthopedic and Neurological Associates, P.A.'s Motion for Extension of Time to File Initial Brief and Designation of Matter pursuant to Rules 240 and 263(b), 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*)

February 18, 2026

**RECEIVED**  
**Feb 18 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 Motion for Extension of Time to File Initial Brief and Designation of Matter pursuant to Rules 240 and 263(b), 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*)