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Mar 16 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

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

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.

**APPELLANT CHI HUN LIM’S MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant Chi Hun Lim, M.D. (hereinafter “Appellant Lim”) respectfully requests a thirty (30) day extension to file his initial brief and designation of matter.

Due to numerous other deadlines/obligations in other matters, the required review of multiple transcripts, and counsel’s multiple, pre-planned out-of-state trips, Appellant Lim’s counsel requests this extension to allow sufficient time to prepare his initial brief and designation of matter. Based on the current briefing schedule, Appellant Lim’s initial brief and designation of matter are currently due on March 27, 2026. If the Court grants the requested thirty (30) day extension, Appellant Lim’s initial brief and designation of matter would then be due on or before April 27, 2026. Appellant Lim requests that the current deadline of March 27, 2026 be held in abeyance pending the Court’s consideration and resolution of this Motion.

Respectfully submitted this the 16th day of March, 2026.

MURPHY & GRANTLAND, P.A.

By: s/Wesley B. Sawyer

Wesley B. Sawyer (S.C. Bar No. 100229)

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Attorneys for Appellant Chi Hun Lim, M.D.

Columbia, South Carolina

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

Andrea Allen, as 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 **Appellant Chi Hun Lim’s Motion for Extension of Time to File 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 below on the following page:

<p>Gerald Drayton Jowers, Jr., Esq. Kenneth M. Suggs, Esq. Janet, Janet & Suggs, LLC 801 Gervais Street, Suite B Columbia, SC 29201 gjowers@jjsjustice.com ksuggs@jjsjustice.com</p> <p>Luther J. Battiste, III, Esq. Johnson, Toal & Battiste, P.A. 1615 Barnwell Street Columbia, SC 29202 bat@jtbpa.com</p> <p>John S. Nichols, Esq. Bluestein Thompson Sullivan LLC 1614 Taylor St Columbia, SC 29201 john@bluesteinattorneys.com</p> <p><i>Attorneys for Plaintiff/Respondent Andrea Allen, as the Personal Representative of the Estate of Albert Charles Jeffries</i></p>	<p>Ashby W. Davis, Esq. Ryan Justin Ginty, Esq. Davis and Snyder, P.A. 5 Hawthorne Park Court Greenville, SC 29615 adavis@davissnyder.com rginty@davissnyder.com</p> <p>Mitchell D. Appleby, Esq. Mooneyham Berry, LLC PO Box 8359 Greenville, SC 29604 mitch@mblc.com</p> <p><i>Attorneys for All Defendants</i></p>
<p>Patrick James McLaughlin, Esq. Wukela Law Office Post Office Box 13057 Florence, SC 29504 patrick@wukelalaw.com</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 & Scarborough, LLP PO Box 11070 Columbia, SC 29211 mitch.brown@nelsonmullins.com bill.wood@nelsonmullins.com</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 gb@lyb.law lma@lyb.law</p> <p>Adam Crittenden Bach, Esq. Emily R. Godwin, Esq.</p>	<p>Vordman Carlisle “Lyle” Traywick, III, Esq. Sarah Cameron Frierson, Esq. Robinson Gray Stepp & Laffitte, LLC PO Box 11449 Columbia, SC 29211 ltraywick@robinsongray.com sfrierson@robinsongray.com</p> <p><i>Attorneys for Defendant Carolina Orthopedic and Neurological Associates, ASC, LLC</i></p>

<p>Tonnson Bach, LLC 1306 S. Church Street Greenville, SC 29605 abach@tonnsenbach.com egodwin@tonnsenbach.com</p> <p><i>Attorneys for Defendants Carolina Orthopedic and Neurological Associates, ASC, LLC and Carolina Orthopedic and Neurological Associates, P.A.</i></p>	
<p>Stephen Peterson Groves, Sr. BUTLER SNOW, LLP 25 Calhoun Street, Suite 250 Charleston, SC 29401 stephen.groves@butlersnow.com</p> <p><i>Attorneys for Defendant Carolina Orthopedic and Neurological Associates, P.A.</i></p>	

Respectfully submitted,

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Columbia, South Carolina
March 16, 2026

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Subject: Andrea Allen v. Chi Hun Lim, M.D. - Case No. 2025-001716 (1950-0330)
Date: Monday, March 16, 2026 3:08:54 PM
Attachments: [image001.png](#)
[image002.png](#)
[Motion for Extension of Time to File Initial Brief and DOM.PDF](#)
[Proof of Service.PDF](#)

Good afternoon,

Please see the attached for service upon you Appellant Chi Hun Lim's Motion for Extension of Time to File Initial Brief and Designation of Matter, which is being filed with the South Carolina Court of Appeals today. A copy of this message will also be filed along with the included Proof of Service. Thank you.

Kindest regards,



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RECEIVED
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Hand-Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

Re: Andrea Allen v. Chi Hun Lim, M.D.
Appellate Case No.: 2025-001716
Civil Action No.: 2020-CP-42-02169
Our File No.: 1950-0330

Dear Ms. Kitchings:

Please find enclosed our check in the amount of \$50.00 for Appellant Chi Hun Lim's Motion for Extension of Time to File Initial Brief and Designation of Matter filed March 16, 2026, in the above-referenced matter.

By copy of this letter, I am serving same on all counsel. Thank you for your gracious consideration of this request.

Yours truly,

s/Wesley B. Sawyer

Wesley B. Sawyer

WBS/mlk

Enclosure

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