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Apr 17 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

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.

**CONSENT MOTION FOR EXTENSION FOR APPELLANT MEGAN NICHOLAS TO
SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant Megan Nicholas, P.A. (hereinafter “Appellant Nicholas”) respectfully requests a fifteen (15) day extension of time to serve and file her Initial Brief and Designation of Matter, which is presently due April 27, 2026.

This extension request is based on the parties having a mediation next week on April 23, 2026. The mediation could not have been set earlier due to Appellant Carolina Orthopaedic and Neurosurgical Associates, P.A.’s substitution of counsel of Attorney Groves for Attorneys Culbreath and Laffitte, and the schedules of multiple attorneys in this case. Based on these extenuating and extraordinary circumstances, Appellant Nicholas’ respectfully requests a minimum of fifteen (15) day extension of time to file her Initial Brief and Designation of Matter. Respondent’s counsel consents. If the Court grants this request, and extends the deadline for

fifteen (15) days, Appellant Nicholas' Initial Brief and Designation of Matter would be due on May 13, 2026. Appellant Nicholas requests that the current deadline of April 27, 2026 be held in abeyance pending the Court's consideration.

Respectfully submitted,

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PROOF OF SERVICE

I, the undersigned, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant Megan Nicholas, P.A., certify that I have served all counsel in this action with a copy of the document(s) specified below by electronic mail to each attorney listed using their primary email address listed in the Attorney Information System.

Pleading(s): Consent Motion for Extension for Appellant Megan Nicholas to
Serve and File Initial Brief and Designation of Matter

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April 17, 2026