

RECEIVED

Apr 21 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.

**CONSENT MOTION FOR EXTENSION FOR APPELLANT CHI HUN LIM 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 Chi Hun Lim, M.D. (hereinafter “Appellant Lim”) respectfully requests a fifteen (15) day extension to serve and file his initial brief and designation of matter, which is currently due April 27, 2026.

This extension request is based on the parties having a mediation next week on April 23, 2026. It was not possible to set the mediation 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 Lim respectfully requests a fifteen (15) day extension of time to serve and file his initial brief and designation of matter. Respondent’s counsel consents. If the Court grants this request and extends the deadline for fifteen (15) days,

then Appellant Lim's initial brief and designation of matter would be due on May 13, 2026. Appellant Lim requests that the current deadline of April 27, 2026 be held in abeyance pending the Court's consideration.

Respectfully submitted this the 21th day of April, 2026.

MURPHY & GRANTLAND, P.A.

By: s/Wesley B. Sawyer

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

John Grantland (S.C. Bar No. 64158)

Post Office Box 6648

Columbia, SC 29260

(803) 782-4100

wsawyer@murphygrantland.com

jgrantland@murphygrantland.com

Attorneys for Appellant Chi Hun Lim, M.D.

Columbia, South Carolina
April 21, 2026

RECEIVED

Apr 21 2026

SC Court of Appeals

IN 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 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 **Consent Motion for Extension for Appellant Chi Hun Lim to Serve and 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@mbllc.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,

MURPHY & GRANTLAND, P.A.

s/Wesley B. Sawyer
Wesley B. Sawyer, Esquire
S.C. Bar # 100229
John Grantland, Esquire
S.C. Bar # 64158
Post Office Box 6648
Columbia, South Carolina 29260
(803) 782-4100
wsawyer@murphygrantland.com
jgrantland@murphygrantland.com
Attorneys for Appellant Chi Hun Lim, M.D.

Columbia, South Carolina
April 21, 2026

From: [Michelle Kiser](#)
To: "[gjowers@jjsjustice.com](#)"; "[ksuggs@jjsjustice.com](#)"; "[bat@jtbpa.com](#)"; "[adavis@davisnyder.com](#)"; "[rginty@davisnyder.com](#)"; "[mitch@mbllc.com](#)"; Patrick McLaughlin; "[mitch.brown@nelsonmullins.com](#)"; "[bill.wood@nelsonmullins.com](#)"; "[abach@tonnsenbach.com](#)"; "[egodwin@tonnsenbach.com](#)"; "Lisle Traywick"; "[qb@lyb.law](#)"; "[john@bluesteinattorneys.com](#)"; John M. Grantland; Wesley B. Sawyer; "[lma@lyb.law](#)"; "Eileen Hindman"; "[mattmwhite@gmail.com](#)"; "Jeff Wald"; "Madison Guyton"; "Meredith Keane"; "[stephen.groves@butlersnow.com](#)"; Renee Dillon; "[sfrierson@robinsongray.com](#)"
Subject: Andrea Allen v. Chi Hun Lim, M.D. - Case No. 2025-001716 (1950-0330)
Date: Tuesday, April 21, 2026 8:51:51 AM
Attachments: [Consent Motion for Extension of Time Appellant Lim's Initial Brief & DOM.PDF](#)
[image001.png](#)
[image002.png](#)
[Proof of Service.PDF](#)

RECEIVED

Apr 21 2026

Good morning,

SC Court of Appeals

Please see the attached for service upon you the Consent Motion for Extension for Appellant Chi Hun Lim to Serve and 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,



Michelle L. Kiser

Legal Assistant

for Wesley B. Sawyer, Esquire,

Timothy J. Newton, Esquire,

and W. Tradd Stover, Esquire

mkiser@murphygrantland.com

Post Office Box 6648

Columbia, SC 29260

Direct: 803-205-1526(ext. 1526)

Fax: 803-782-4140

www.murphygrantland.com



Please be advised that this e-mail and any files transmitted with it are confidential attorney-client communications or may otherwise be privileged or confidential and are intended solely for the individual or entity to whom they are addressed. If you are not the intended recipient, please do not read, copy or retransmit this communication but destroy it immediately. Any unauthorized dissemination, distribution or copying of this communication is strictly prohibited.



April 21, 2026

RECEIVED
Apr 21 2026
SC Court of Appeals

Hand-Delivered

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

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 Consent Motion for Extension for Appellant Chi Hun Lim to Serve and File Initial Brief and Designation of Matter filed April 21, 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

Cc: Gerald Drayton Jowers, Jr., Esq. (gjowers@jjsjustice.com)
Kenneth M. Suggs, Esq. (ksuggs@jjsjustice.com)
Luther J. Battiste, III, Esq. (bat@jtbpa.com)
John S. Nichols, Esq. (john@bluesteinattorneys.com)
Ashby W. Davis, Esq. (adavis@davissnyder.com)
Ryan Justin Ginty, Esq. (rginty@davissnyder.com)
Mitchell D. Appleby, Esq. (mitch@mblc.com)
Patrick James McLaughlin, Esq. (patrick@wukelalaw.com)
John Grantland, Esq. (jgrantland@murphygrantland.com)
C. Mitchell Brown, Esq. (mitch.brown@nelsonmullins.com)
William C. Wood, Jr., Esq. (bill.wood@nelsonmullins.com)
Gregory Brown, Esq. (gb@lyb.law)

Louise Aponte, Esq. (lma@lyb.law)
Adam Crittenden Bach, Esq. (abach@tonnsenbach.com)
Emily R. Godwin, Esq. (egodwin@tonnsenbach.com)
Vordman Carlisle “Lyle” Traywick, III, Esq. (ltraywick@robinsongray.com)
Sarah Cameron Frierson, Esq. (sfrierson@robinsongray.com)
Stephen Peterson Groves, Sr., Esq. (stephen.groves@butlersnow.com)