

RECEIVED

Apr 21 2026

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Spartanburg County
Honorable J. Derham Cole, Jr., Circuit Court Judge
Honorable Grace Gilchrist Knie, Circuit 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 Hum Lim, M.D.; Megan Nichols, P.A.; and Carolina Orthopedic
and Neurological Associates, P.A.,

Appellants.

**MOTION FOR EXTENSION OF TIME (3rd) IN WHICH
TO FILE THE INITIAL BRIEF AND DESIGNATION OF MATTER
OF THE APPELLANT, CAROLINA ORTHOPEDIC AND
NEUROLOGICAL ASSOCIATES, P.A.**

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
E-Mail: Stephen.Groves@butlersnow.com

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

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellant, Carolina Orthopedic and Neurological Associates, P.A. (“CONA-PA”), pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, and respectfully requests this Court of Appeals to grant CONA-PA a fifteen (15) day extension of time in which to serve CONA-PA’s *Initial Appellant’s Brief and Designation of Matter to be Included in the Record on Appeal* (the “DOM”) in this appellate matter. The basis for this motion is the parties will be conducting a mediation of this matter on Thursday, 23 April 2026. The mediation, however, could not have been set earlier due to CONA-PA’s substitution of the undersigned as its appellate counsel in place of Gray T. Culbreath, Esquire and Jessica L. Laffitte, Esquire, as well as the schedules of multiple attorneys in this case. Based on these extenuating and extraordinary circumstances, CONA-PA respectfully requests a minimum of fifteen (15) day extension of time to file CONA-PA’s *Initial Appellant’s Brief and DOM*. John S. Nichols, Esquire, appellate counsel for the Respondent, Andrea Allen, as Personal Representative of the Estate of Albert Charles Jeffries, deceased (“Ms. Allen”), has kindly consented to this additional extension request.

Based upon the current briefing schedule CONA-PA’s *Initial Appellant’s Brief and DOM* are currently due to be served on or before **Monday, 27 April 2026**. Consequently, in anticipation of a favorable reception and subsequent grant of this extension motion, CONA-PA’s *Initial Appellant’s Brief and DOM* would then be due on or before **Wednesday, 13 May April 2026**.

Finally, CONA-PA respectfully requests this Court of Appeals to hold the briefing time in abeyance until such time as this extension motion may be considered and ruled upon.

Respectfully submitted:

BUTLER SNOW LLP

By: *Stephen P. Groves, Sr.*
Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
E-Mail: Stephen.Groves@butlersnow.com

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

Charleston, South Carolina

21 April 2026

OTHER COUNSEL OF RECORD
WILL BE SHOWN ON
THE FOLLOWING PAGES

OTHER COUNSEL OF RECORD

Gerald D. Jowers, Jr., Esquire
Kenneth M. Suggs, Esquire
JANET, JANET & SUGGS, LLC
801 Gervais Street, Suite B
Columbia, South Carolina 29201
E-Mail: gjowers@jjsjustice.com
ksuggs@jjsjustice.com

Luther J. Battiste, III, Esquire
JOHNSON, TOAL & BATTISTE, P.A.
1615 Barnwell Street
Columbia, South Carolina 29202
E-Mail: bat@jtbp.com

John S. Nichols, Esquire
BLUESTEIN THOMPSON SULLIVAN LLC
1614 Taylor St
Columbia, SC 29201
E-Mail: john@bluesteinattorneys.com

*Attorneys for Respondent,
Andrea Allen, as the Personal Representative of the
Estate of Albert Charles Jeffries*

Ashby W. Davis, Esquire
Ryan Justin Ginty, Esquire
DAVIS AND SNYDER, P.A.
5 Hawthorne Park Court
Greenville, South Carolina 29615
E-Mail: adavis@davissnyder.com
rginty@davissnyder.com

Mitchell D. Appleby, Esq.
MOONEYHAM BERRY, LLC
Post Office Box 8359
Greenville, South Carolina 29604
E-Mail: mitch@mbllc.com

*Attorneys for the Appellants,
Carolina Orthopedic and Neurological Associates, P.A.;
Chi Hun Lim, M.D., and Megan Nicholas, P.A.*

Adam Crittenden Bach, Esquire
Emily R. Godwin, Esquire
TONNSEN BACH, LLC
1306 South Church Street
Greenville, South Carolina 29605
E-Mail: abach@tonnsenbach.com
egodwin@tonnsenbach.com

Gregory Brown, Esquire
Louise Aponte, Esquire
LOWE YEAGER BROWN, PLLC
920 Volunteer Landing,
Suite 200
Knoxville, Tennessee 37915
E-Mail: lma@lyb.law
gb@lyb.law

*Attorneys for the Appellant,
Carolina Orthopedic and Neurological Associates, PA*

C. Mitchell Brown, Esquire
William C. Wood, Jr., Esquire
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Post Office Box 11070
Columbia, South Carolina 29211
E-Mail: mitch.brown@nelsonmullins.com
bill.wood@nelsonmullins.com

*Attorneys for the Appellant,
Meghan Nicholas, P.A.*

Vordman Carlisle "Lisle" Traywick, III, Esquire
Sarah C. Frierson, Esquire
Rebecca Laffitte, Esquire
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
E-Mail: ltraywick@robinsongray.com
blaffitte@robinsongray.com
sfrierson@robinsongray.com

*Attorneys for the Appellant,
Carolina Orthopedic and Neurological Associates, ASC, LLC*

Wesley B. Sawyer, Esquire
John Grantland, Esquire
MURPHY & GRANTLAND, P.A.
Post Office Box 6648
Columbia, South Carolina 29260
E-Mail: wsawyer@murphygrantland.com
jgrantland@murphygrantland.com

Patrick James McLaughlin, Esquire
WUKELA LAW OFFICE
Post Office Box 13057
Florence, South Carolina 29504
E-Mail: patrick@wukelalaw.com

*Attorneys for the Appellant,
Chi Hun Lim, M.D.*

100459025.v1

RECEIVED

Apr 21 2026

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Spartanburg County
Honorable J. Derham Cole, Jr., Circuit Court Judge
Honorable Grace Gilchrist Knie, Circuit 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 Hum Lim, M.D.; Megan Nichols, P.A.; and Carolina Orthopedic
and Neurological Associates, P.A.,

Appellants.

**PROOF OF SERVICE FOR
MOTION FOR EXTENSION OF TIME (3rd) IN WHICH
TO FILE THE INITIAL BRIEF AND DESIGNATION OF MATTER
OF THE APPELLANT, CAROLINA ORTHOPEDIC AND
NEUROLOGICAL ASSOCIATES, P.A.**

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street,
Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
E-Mail: Stephen.Groves@butlersnow.com

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

I, Stephen P. Groves, Sr., Esquire, hereby certify that **21 April 2026**, pursuant to Rule 262(a)(3), SCACR, and Supreme Court Order No. 2024-04-24-01 (*amending Supreme Court Order No.. 2022-05-06-03*), I electronically served a copy of the **Motion for Extension of Time (3^d) in Which to File Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal** submitted by the Appellant, Carolina Orthopedic and Neurological Associates, P.A, on All Counsel of Record via e-mail at the addresses noted:

Gerald D. Jowers, Jr., Esquire
Kenneth M. Suggs, Esquire
JANET, JANET & SUGGS, LLC
801 Gervais Street, Suite B
Columbia, South Carolina 29201
E-Mail: gjowers@jjsjustice.com
ksuggs@jjsjustice.com

Luther J. Battiste, III, Esquire
JOHNSON, TOAL & BATTISTE, P.A.
1615 Barnwell Street
Columbia, South Carolina 29202
E-Mail: bat@jtbpa.com

John S. Nichols, Esquire
BLUESTEIN THOMPSON SULLIVAN LLC
1614 Taylor St
Columbia, SC 29201
E-Mail: john@bluesteinattorneys.com

*Attorneys for Respondent,
Andrea Allen, as the Personal Representative of the
Estate of Albert Charles Jeffries*

Ashby W. Davis, Esquire
Ryan Justin Ginty, Esquire
DAVIS AND SNYDER, P.A.
5 Hawthorne Park Court
Greenville, South Carolina 29615
E-Mail: adavis@davissnyder.com
rginty@davissnyder.com

Mitchell D. Appleby, Esq.
MOONEYHAM BERRY, LLC
Post Office Box 8359
Greenville, South Carolina 29604
E-Mail: mitch@mbllc.com

*Attorneys for the Appellants,
Carolina Orthopedic and Neurological Associates, P.A.;
Chi Hun Lim, M.D., and Megan Nicholas, P.A.*

Adam Crittenden Bach, Esquire
Emily R. Godwin, Esquire
TONNSEN BACH, LLC
1306 South Church Street
Greenville, South Carolina 29605
E-Mail: abach@tonnsenbach.com
egodwin@tonnsenbach.com

Gregory Brown, Esquire
Louise Aponte, Esquire
LOWE YEAGER BROWN, PLLC
920 Volunteer Landing,
Suite 200
Knoxville, Tennessee 37915
E-Mail: lma@lyb.law
gb@lyb.law

*Attorneys for the Appellant,
Carolina Orthopedic and Neurological Associates, PA*

C. Mitchell Brown, Esquire
William C. Wood, Jr., Esquire
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Post Office Box 11070
Columbia, South Carolina 29211
E-Mail: mitch.brown@nelsonmullins.com
bill.wood@nelsonmullins.com

Attorneys for the Appellant, Meghan Nicholas, P.A.

Vordman Carlisle "Lisle" Traywick, III, Esquire
Sarah C. Frierson, Esquire
Rebecca Laffitte, Esquire
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
E-Mail: ltraywick@robinsongray.com
blaffitte@robinsongray.com
sfrierson@robinsongray.com

*Attorneys for the Appellant,
Carolina Orthopedic and Neurological Associates, ASC, LLC*

Wesley B. Sawyer, Esquire
John Grantland, Esquire
MURPHY & GRANTLAND, P.A.
Post Office Box 6648
Columbia, South Carolina 29260
E-Mail: wsawyer@murphygrantland.com
jgrantland@murphygrantland.com

Patrick James McLaughlin, Esquire
WUKELA LAW OFFICE
Post Office Box 13057
Florence, South Carolina 29504
E-Mail: patrick@wukelalaw.com

Attorneys for the Appellant, Chi Hun Lim, M.D.

Signed: *Stephen P. Groves, Sr.*
Stephen P. Groves, Sr.

Charleston, South Carolina
21 April 2026
100459653.v1