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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable J. Durham Cole, Jr., Circuit Court Judge
The Honorable 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 Jefferies Respondent,

v.

Chi Hun Lim, M.D., Megan Nicholas, P.A., Carolina
Orthopedic and Neursurgical Associates, PA Appellants,

**RESPONDENT'S DESIGNATION OF ADDITIONAL MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following matter be included in the Record on Appeal in addition to the matter previously designated by each individual Appellant:

1. Plaintiff's Response to Defendants' Motion for Setoff filed June 26, 2025;
2. Plaintiff's Response to Defendants' Motion for a New Trial Based on Thirteenth Juror Doctrine dated June 26, 2025 with exhibits;
3. Plaintiff's Response to Defendants' Motion for New Trial Absolute and New Trial Nisi Remittitur dated June 26, 2025;
4. Plaintiff's Response to Defendants' Motion for JNOV dated June 26, 2025;
5. Plaintiff's Response to Defendants' Motion to Alter or Amend Judgment dated June 26, 2025 with exhibits;
6. Exhibit 1 to Deposition of Dr. Chris Erb (list of opinions admitted at trial).

I certify that this designation contains no matter which is irrelevant to this appeal.

August 14, 2026

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

John S. Nichols, Esq.

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