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Aug 25 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 REPLY BRIEF**

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 ten (10) day extension to serve and file his Reply Brief, which is currently due August 31, 2026. This is Appellant Lim’s second request for an extension of this deadline.

This extension request is based on his counsel having numerous other deadlines and work obligations for other matters, including many work obligations which require pre-planned, out-of-state travel. Based on these circumstances, Appellant Lim respectfully requests a ten (10) day extension of time to serve and file his Reply Brief. Respondent’s counsel consents. If the Court grants this request and extends the deadline for ten (10) days, then Appellant Lim’s Reply Brief would be due on September 10, 2026. Appellant Lim requests that the current deadline of August 31, 2026 be held in abeyance pending the Court’s consideration.

Respectfully submitted this the 25th day of August, 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
August 25, 2026

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APPEAL FROM SPARTANBURG COUNTY
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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 Orthopaedic and
Neurological Associates, PA, 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 Reply Brief 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:

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 Luther J. Battiste, III, Esq. Johnson, Toal & Battiste, P.A. 1615 Barnwell Street Columbia, SC 29202 bat@jtbpa.com John S. Nichols, Esq. Bluestein Thompson Sullivan LLC 1614 Taylor St Columbia, SC 29201 john@bluesteinattorneys.com <i>Attorneys for Plaintiff/Respondent Andrea Allen, as the Personal Representative of the Estate of Albert Charles Jeffries</i>	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 Mitchell D. Appleby, Esq. Mooneyham Berry, LLC PO Box 8359 Greenville, SC 29604 mitch@mbllc.com <i>Attorneys for All Defendants</i>
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Gregory Brown, Esq. Louise Aponte, Esq. Lowe Yeager Brown, PLLC 920 Volunteer Landing, Suite 200 Knoxville, TN 37915 gb@lyb.law lma@lyb.law Adam Crittenden Bach, Esq. Emily R. Godwin, Esq. Tonnsen Bach, LLC 1306 S. Church Street Greenville, SC 29605 abach@tonnsenbach.com	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 <i>Attorneys for Defendant Carolina Orthopedic and Neurological Associates, ASC, LLC</i>

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

Respectfully submitted,

MURPHY & GRANTLAND, P.A.

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Columbia, South Carolina
August 25, 2026

From: [Michelle Kiser](#)
To: ["gjowers@jjsjustice.com"](#); ["ksuggs@jjsjustice.com"](#); ["bat@jtbpa.com"](#); ["adavis@davisssnyder.com"](#); ["rginty@davisssnyder.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, August 25, 2026 12:20:58 PM
Attachments: [Consent Motion for Extension.PDF](#)
[image001.png](#)
[image002.png](#)
[Proof of Service.PDF](#)
[Kitchings 08-25-26 Encl. Filing Fee for Motion.PDF](#)

Good afternoon,

Please see the attached for service upon you correspondence, the Consent Motion for Extension for Appellant Chi Hun Lim to Serve and File Reply Brief, and Proof of Service, which are being filed with the South Carolina Court of Appeals today. A copy of this message will also be filed along with the attached Proof of Service. Thank you.

Kindest regards,



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August 25, 2026

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 the Consent Motion for Extension for Appellant Chi Hun Lim to Serve and File Reply Brief filed August 25, 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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