

RECEIVED
Oct 28 2026
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable Grace Knie, Circuit Court Judge

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
Neurosurgical Associates, PA, Appellants.

PROOF OF SERVICE

This is to certify that the undersigned counsel has caused to be served this day the **Final Reply Brief of Appellant Chi Hun Lim, M.D.** 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 pages:

<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 Megan 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. Tonnsen Bach, LLC 1306 S. Church Street Greenville, SC 29605 abach@tonnsenbach.com</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>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
October 28, 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: Wednesday, October 28, 2026 10:30:56 AM
Attachments: [Final Reply Brief of Appellant Chi Hun Lim, M.D..pdf](#)
[image001.png](#)
[image002.png](#)
[Final Brief of Appellant Chi Hun Lim, M.D..pdf](#)

Good morning,

Please see the attached for service upon you the Final Brief of Appellant Chi Hun Lim, M.D. with the Proof of Service and the Final Reply Brief of Appellant Chi Hun Lim, M.D. with 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 included Proofs of Service. Thank you so much!

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



RECEIVED
Oct 28 2026
SC Court of Appeals

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.



Wesley B. Sawyer
Phone: (803) 454-1233
wsawyer@murphygrantland.com

October 28, 2026

Hand-Delivered

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

RECEIVED
Oct 28 2026
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:

Enclosed please find our one (1) additional bound copy of the Final Brief of Appellant Chi Hun Lim, M.D. and one (1) additional bound copy of the Final Reply Brief of Appellant Chi Hun Lim, M.D. per the South Carolina Court of Appeals letter dated September 8, 2026.

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@mbllc.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)