

STATE OF SOUTH CAROLINA)
)
COUNTY OF HORRY)

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2024-CP-26-03798

JENNIFER SPIVEY FOLEY, as Personal)
Representative of the Estate of SCOTT)
RYAN SPIVEY,)

Plaintiff,)

vs.)

CHARLES WELDON BOYD and)
KENNETH WILLIAMS,)

Defendants.)

DEFENDANTS' MOTION
IN LIMINE SEEKING EXCLUSION
OF PLAINTIFF'S EXPERT

TO: PLAINTIFF, BY AND THROUGH HER ATTORNEYS:

PLEASE TAKE NOTICE that attorneys for the Defendant, Charles Weldon Boyd ("Defendant Boyd") and Defendant Kenneth Williams ("Defendant Williams") will move before the Court, the Honorable Eugen Griffith for an Order or Orders excluding the opinions of Plaintiff's designated expert, Dr. Robert Maher, PE.

The Defendants intend to further support their motion with motion memoranda, statutory and common law of the State of South Carolina and such argument as the Court will permit.

The undersigned certify that the undersigned are informed and believe that pre-filing consultation upon the motion would be to no avail.

[signatures are on the following page]

Respectfully submitted this 5th day of February, 2026.

**WRIGHT, WORLEY, POPE,
EKSTER & MOSS, PLLC**
Attorneys for the Defendant Boyd

s/ Kenneth R. Moss

Kenneth R. Moss, SC Bar No: 15520
George N. Spirakis, SC Bar No. 12024
628A Sea Mountain Highway
North Myrtle Beach SC 29582
Tel: (843) 281-9901 fax: (843) 281-9903
Email: KennethMoss@wwpemlaw.com
GeorgeSpirakis@wwpemlaw.com

ROBERT E. LEE, LLC
Attorneys for Defendant Williams

s/ Robert E. Lee

Robert E. Lee – S.C. Bar No. 63052
Post Office Box 1096
Marion, South Carolina 29571
Telephone: 843-423-1313
E-Mail: rel@rellawfirm.com

**THE LAW OFFICES OF
L. MORGAN MARTIN, PA**
Attorneys for Defendant Williams

s// L. Morgan Martin

L. Morgan Martin
O'Bryan Martin
1121 Third Avenue
Conway SC 29526
Telephone: 843-248-3177
E-Mail: mmartin@lmorganmartin.com
martino@lmorganmartin.com