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Dec 19 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2023-CP-2901534

MTS CLT, LLC,..... Appellant,

v.

Jane M. Pettus, Trustee of the Joseph A. Pettus
and Jane M. Pettus Revocable Living Trust
u/i/d April 12, 2005, and Rob Bilbro, Respondents.

NOTICE OF APPEAL

MTS CLT, LLC appeals the following Orders of the Honorable Eugene C. Griffith, Jr., signed on December 4, 2025:

1. Order granting summary judgment in favor of Defendant Jane M. Pettus, Trustee of the Joseph A. Pettus and Jane M. Pettus Revocable Living Trust u/i/d April 12, 2005, dismissing the claims of MTS CLT, LLC, and canceling the Lis Pendens (the “Pettus Order”).
2. Order granting summary judgment in favor of Defendant Rob Bilbro and dismissing the claims of MTS CLT, LLC (the “Bilbro Order”).

The Orders were filed by the Clerk on December 4, 2025. Appellant timely filed motions to reconsider both Orders pursuant to Rule 59. Appellant received notice on December 18, 2025, of the denial of both motions for reconsideration by Order of the Honorable Eugene C. Griffith, Jr. dated December 18, 2025, and filed with the Clerk

of Court's Office on December 18, 2025. A copy of the Pettus Order is attached as Exhibit A to this notice of appeal. A copy of the Bilbro Order is attached as Exhibit B to this notice of appeal. A copy of the Order denying Appellant's motions for reconsideration as to the Pettus Order and the Bilbro Order is attached as Exhibit C to this notice of appeal.

Respectfully submitted,

December 19, 2025

/s/ J. Kemper Patton
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PROOF OF SERVICE

I, J. Kemper Patton, as attorney for MTS CLT, LLC, certify that I have served the Notice of Appeal as to Respondents Jane M. Pettus, Trustee of the Joseph A. Pettus and Jane M. Pettus Revocable Living Trust u/i/d April 12, 2005, and Rob Bilbro, on the Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on December 19, 2025, and by electronic mail, addressed to their attorneys of record as follows:

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/s/ J. Kemper Patton
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Raleigh, North Carolina
December 19, 2025