

**RECEIVED**  
**Jan 22 2026**  
**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

---

Appellate Case No. 2025-002538

---

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.

---

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

---

Appellant MTS CLT, LLC (“Appellant”) respectfully moves this Court for an extension of time to file and serve its Initial Brief and Designation of Matter with respect to this appeal of orders granting summary judgment 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.

Appellant’s motion is based on the grounds that Counsel for Appellant requires additional time to prepare the Initial Brief and Designation of Matter due to a very active caseload, and would respectfully request an additional thirty (30) days to complete, file, and serve these pleadings. This is the first request for an extension in this matter. By our calculations, the new deadline would be March 12, 2026.

Counsel for Appellant consulted with Counsel for Respondents on January 21, 2022,

via electronic mail. Counsel for Respondents consented to the extension on the same date.

WHEREFORE, Appellant respectfully requests that it be granted an additional thirty (30) days to file its Initial Brief and Designation of Matter, making the Initial Brief and Designation of Matter due March 12, 2026.

January 22, 2026

Respectfully submitted,

/s/ J. Kemper Patton  
J. KEMPER PATTON  
SC State Bar No. 105202  
JAMES C. ADAMS, II, pro hac vice  
NC State Bar No. 18063  
BROOKS, PIERCE, McLENDON  
HUMPHREY & LEONARD, LLP  
P.O. Box 1800  
Raleigh, NC 27602  
Telephone: (919) 882-2518  
Facsimile: (336) 232-9103  
Email: [kpatton@brookspierce.com](mailto:kpatton@brookspierce.com)  
[jadams@brookspierce.com](mailto:jadams@brookspierce.com)  
*Attorneys for Appellant*

**RECEIVED**

**Jan 22 2026**

**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

---

Appellate Case No. 2025-002538

---

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.

---

**PROOF OF SERVICE**

---

I, J. Kemper Patton, as attorney for MTS CLT, LLC, certify that I have served the Appellant’s Motion for Extension of Time to File Initial Brief and Designation of Matter on the Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on January 22, 2026, and by electronic mail, addressed to their attorneys of record as follows:

Jeremy D. Melville  
W. Mark White  
Spencer & Spencer, P.A.  
P.O. Box 790  
Rock Hill, SC 29731  
[jdm@spencerfirm.com](mailto:jdm@spencerfirm.com)  
[markwhite@spencerfirm.com](mailto:markwhite@spencerfirm.com)  
*Attorneys for Respondent Pettus*

Lawrence M. Hershon  
The Hershon Law Firm, P.A.  
1565 Sam Rittenberg Boulevard, Suite 103  
Charleston, SC 29407  
[lawrence@hershonlawfirm.com](mailto:lawrence@hershonlawfirm.com)  
*Attorney for Respondent Bilbro*

/s/ J. Kemper Patton  
J. KEMPER PATTON

Raleigh, North Carolina  
January 22, 2026

January 22, 2026

**VIA FEDEX**

South Carolina Court of Appeals  
Clerk's Office  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**Jan 22 2026**  
**SC Court of Appeals**

Re: *MTS CLT, LLC 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*; Case No. 2025-002538 (SC Court of Appeals)

Dear Sir/Madam:

Our firm represents MTS CLT, LLC in the above-referenced matter. On behalf of our client, we are filing a *Motion for Extension of Time to File Initial Brief and Designation of Matter* by e-mail today. Our firm check in the amount of \$50 for the associated filing fee is enclosed. If you need anything else, please do not hesitate to contact me.

Sincerely,



J. Kemper Patton

Enclosure