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Apr 03 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LANCASTER COUNTY

Court of Common Pleas

The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2023-CP-29-01534
Appellate Case No. 2025-002538

MTS CLT, LLC,

.....Appellant,

v.

Jane M. Pettus, Trustee of The Joseph A.
Pettus and Jane A. Pettus Revocable Living
Trust U/I/D April 12, 2005, and Rob Bilbro,

.....Respondents.

RESPONDENTS' JOINT MOTION FOR EXTENSION

Respondents' current deadline to submit their Initial Briefs and Designation of Matter to be Included in the Record on Appeal ("Initial Briefs and Designation") in this matter is April 13, 2026. Due to the schedule of counsel, Respondents each respectfully request an extension of thirty (30) days from the current deadline to submit their Initial Briefs and Designation. Counsel for Respondents have consulted with Counsel for Appellant, and Counsel for Appellant has consented to the extension requested herein.

Respectfully Submitted,

s/Lawrence M. Hershon

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Attorney for Respondent Rob Bilbro

s/ Jeremy D. Melville

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*Attorney for Respondent Jane M. Pettus,
Trustee of The Joseph A. Pettus and Jane A.
Pettus Revocable Living Trust U/I/D April
12, 2005*

April 3, 2026

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.....Respondents.

PROOF OF SERVICE

I, the undersigned, hereby certify that I have served the Motion for Extension on the party of record via their designated email addresses on April 3, 2026, as follows:

Jeremy Melville
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Kemper Patton
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s/Lawrence M. Hershon
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Attorney for Respondent



THE HERSHON LAW FIRM, P.A. **Apr 03 2026**

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Via Email <ctappfilings@sccourts.org> and U.S. Mail

The Honorable Catherine S. Harrison
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

**Re: *MTS CLT, LLC v. Jane M. Pettus, et al.*
*Appellate Case No. 2025-002538***

Mrs. Harrison:

Attached for electronic filing please find Respondents Jane M. Pettus, Trustee of The Joseph A. Pettus and Jane A. Pettus Revocable Living Trust U/I/D April 12, 2005, and Rob Bilbro's Motion for Extension and Proof of Service. Enclosed with the mailed version only, please find this firm's check for \$50.00 for the filing fee for the Motion for Extension in the above-referenced matter.

Sincerely,

Lawrence M. Hershon

LMH:
Enclosure

cc: Jeremy Melville, Esq. (via email only)
Kemper Patton, Esq. (via email only)
James C. Adams, II, Esq. (via email only)

