

RECEIVED

May 01 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

---

Case No. 2023-CP-29-01534  
Appellate Case No. 2015-000079

---

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.

---

**MOTION FOR EXTENSION**

---

**COMES NOW** respondent Jane M. Pettus, Trustee of the Joseph A. Pettus and Jane M. Pettus Revocable Living Trust u/i/d April 12, 2005 ("Pettus") through its undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, and respectfully requests an extension of time to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal ("Pettus' Brief and Designation").

Appellant served Appellant's Initial Brief and Appellant's Designation of Matter to be Included in the Record

on Appeal (collectively, "Appellant's Brief and Designation") on March 12, 2026. By Order dated April 6, 2026, this Court extended the deadline for Respondents to file their respective Brief and Designation until May 13, 2026.

Pettus respectfully requests the Court grant Pettus an additional thirty-day extension, or until June 12, 2026 to file and serve Pettus' Brief and Designation. The undersigned counsel for Pettus is contending with competing discovery deadlines and other obligations in other cases pending in Circuit Court and the South Carolina District Court. Further complicating matters, the undersigned will miss time from work on account of a medical procedure scheduled for May 8, 2026. Pettus submits the present Request to afford her counsel sufficient time to prepare Pettus' Initial Brief and Designation in this matter.

Counsel for Appellant and counsel for Respondent Rob Bilbro both consent to the relief sought in this Motion.

**WHEREFORE,** the undersigned counsel for Pettus respectfully requests a thirty-day extension of time in which to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

May 1, 2026

By: /s/ Jeremy D. Melville  
Jeremy D. Melville  
SC Bar No. 77473  
Spencer & Spencer, P.A.  
226 East Main Street  
P.O. Box 790  
Rock Hill, SC 29731  
Phone: (803) 327-7191  
Fax: (803) 327-3868

ATTORNEY FOR JANE M. PETTUS

**RECEIVED**

**May 01 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

---

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 M. Pettus  
Revocable Living Trust u/i/d April 12, 2005  
and Rob Bilbro . . . . . Respondents.

---

**PROOF OF SERVICE**

---

I, Jeremy D. Melville, as attorney for Jane M. Pettus,  
certify that I have served the foregoing Motion for Extension  
of Time on counsel of record for all parties via their  
designated email addresses on May 1, 2026 as follows:

Lawrence Hershon  
[lawrence@hershonlawfirm.com](mailto:lawrence@hershonlawfirm.com)

Kemper Patton  
[kpatton@brookspierce.com](mailto:kpatton@brookspierce.com)

James C. Adams  
[jadams@brookspierce.com](mailto:jadams@brookspierce.com)

SPENCER & SPENCER, P.A.

By: /s/ Jeremy D. Melville  
Jeremy D. Melville  
SC Bar No. 77473  
226 East Main Street  
Rock Hill, SC 29730  
Tel: (803)327-7191

ATTORNEYS FOR RESPONDENT  
JANE M. PETTUS