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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.

RESPONDENT’S RULE 209(c) CERTIFICATION OF COUNSEL

Pursuant to Rule 209(c) of the South Carolina Appellate Court Rules, the undersigned counsel hereby certifies that Respondent Rob Bilbro’s Designation of Matter to be included in the Record on Appeal contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

s/ Lawrence M. Hershon
Lawrence M. Hershon (SC Bar: 77514)
The Hershon Law Firm, P.A.
1565 Sam Rittenberg Blvd., Suite 103
Charleston, SC 29407
Telephone: (843) 829-2022
Facsimile: (843) 829-2023
lawrence@hershonlawfirm.com

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Charleston, South Carolina



THE HERSHON LAW FIRM, P.A.

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Via Email <ctappfilings@sccourts.org>

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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

Mrs. Kitchings:

Enclosed please find Respondent Rob Bilbro's Initial Brief, Respondent Rob Bilbro's Designation of Matter to Be Included in the Record on Appeal, and Respondent Rob Bilbro's Rule 209(c) Certification of Counsel 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)

