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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
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.

DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

In addition to the items and matter identified in Appellant's Designation of Matter to be Included in the Record on Appeal, Appellant's Supplemental Designation of Matter to be Included in the Record on Appeal, and Respondent Rob Bilbro's Designation of Matter to be Included in the Record on Appeal, Respondent Jane M. Pettus ("Pettus") respectfully requests that the following additional matter be included in the Record on Appeal.

1. Pettus Answer and Counterclaims filed December 19, 2023 including Exhibits A-E.

2. Affidavit of Jane Pettus dated March 26, 2024, including Exhibits A-E thereto.

3. Affidavit of Jane Pettus dated August 23, 2024, including Exhibit A thereto.

4. Plaintiff Motion for Continuance filed June 19, 2024, including Exhibits 1-4 thereto.

5. Rule 56(f) Affidavit of James Kemper Patton filed June 21, 2024, including Exhibits 1-6 thereto.

6. Pettus' Second Supplemental Memorandum in Support filed July 8, 2024.

7. Affidavit of Heath Myers dated November 8, 2024, including Exhibits A-D thereto.

8. Consent Scheduling Order entered on January 15, 2025.

9. Consent Order (Modifying Scheduling Order) entered May 8, 2025.

10. Consent Order (Modifying Scheduling Order) entered July 15, 2025.

11. MTS Motion for Protective Order regarding Deposition of Kathy Garner filed July 2, 2025.

12. Transcript of Deposition of Jane M. Pettus Volume I, pp. 1-2.

13. Transcript of Deposition of Allison Pettus Volume I, pp. 1-2.

14. Transcript of Deposition of Allison Pettus Volume II, pp. 1-2.

15. Transcript of Deposition of Scott Pettus Volume I, pp.1-3.

16. Transcript of Deposition of Scott Pettus Volume II, pp. 1-2.

17. Transcript of Deposition of Davis Riddle, pp. 1-3.

18. Transcript of Deposition of Brandon Pridemore, pp. 1-3, 219-220.

19. Transcript of 30(b)(6) Deposition of MTS, pp. 1, 160-163.

20. Pettus' Memorandum in Opposition to Plaintiff's Motion for Summary Judgment filed September 22, 2025.

21. Pettus' Supplemental Memorandum in Support of Motion for Summary Judgment filed September 23, 2025, including Exhibit A-B thereto.

The undersigned certifies that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

June 12, 2026

By: */s Jeremy D. Melville*

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