

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Jun 29 2026

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

SC Court of Appeals

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
Appellant's Initial Reply Brief on the Respondents by depositing a copy of the same
in the United States Mail, postage prepaid, on June 29, 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
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
Attorney for Respondent Bilbro

Respectfully submitted this the 29th day of June, 2026.

/s/ J. Kemper Patton
J. Kemper Patton (SC Bar No. 105202)

James C. Adams, II (*Pro hac Vice*, NC Bar No.
18063)
Brooks, Pierce, McLendon, Humphrey &
Leonard, LLP
P.O. Box 1800
Raleigh, NC 27602
Telephone: (919) 882-2518
Facsimile: (336) 232-9103
kpatton@brookspierce.com
jadams@brookspierce.com
Attorneys for Appellant