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Apr 09 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2026-000043  
Case No. 2024-CP-10-04606

Frank Perrelli, Jr.,.....Appellant,

v.

Vacation Inspirations, Destination Travel, LLC, Joseph Shirley, Randy Gardner, and Jeffrey Pumilia,..... Respondents,

**APPELLANTS’ MOTION TO CONSOLIDATE APPEALS, FOR EXTENSION OF TIME, AND FOR LEAVE TO EXCEED PAGE LIMITS**

NOW COMES Appellant, Frank Perrelli, Jr., (“Appellant”), by and through undersigned counsel, and respectfully move this Court pursuant to Rules 214, 205(b)(5), 240, and 263, SCACR, for: (1) consolidation of related appeals; (2) a fifteen (15) day extension of time to file Appellant’s Initial Brief; and (3) leave to exceed the applicable page limitations. In support thereof, Appellant shows this Court the following:

**I. CONSOLIDATION IS WARRANTED UNDER RULE 214, SCACR**

1. This appeal arises from the Order Granting Defendants’ Motion Compelling Arbitration and Stay of Proceedings entered July 23, 2025, and the Order Denying Plaintiff’s Motion to Reconsider entered December 12, 2025.
2. A related appeal involving the same Respondents and materially identical legal issues is pending in Appellate Case No. 2026-000058.
3. The appeals arise from substantially similar factual circumstances and involve overlapping parties, including each of the Respondents.

4. Both appeals present common and threshold legal questions, including enforceability of the arbitration provision and appellate jurisdiction.
5. The circuit court heard one oral argument covering both cases on March 27, 2025.
6. Consolidation will promote judicial economy and avoid duplicative briefing.

**II. EXTENSION OF TIME IS WARRANTED UNDER RULES 263(B), 240(A) SCACR**

7. Appellant's Initial Brief is currently due on April 16, 2026.
8. Appellant requests a fifteen (15) day extension to allow for coordinated and consolidated briefing.
9. Appellant conferred with Respondents, who have no objection to a 15-day extension. A copy of counsel's express written consent is attached hereto as Exhibit A.
10. This appeal presents threshold issues of appellate jurisdiction and complex arbitration issues requiring full briefing.
11. The requested extension is made in good faith and not for delay.

**III. LEAVE TO EXCEED PAGE LIMITS UNDER RULE 205(B)(5), SCACR**

12. The applicable page limits are insufficient due to appellate jurisdiction issues, overall complexity of the case, and potential consolidation.
13. The appeal presents multiple independent grounds for reversal requiring full development.
14. Appellants respectfully request leave to file a principal brief not to exceed sixty-five (65) pages, which is fifteen (15) pages in excess of the limit prescribed by Rule 205(b)(5), SCACR.

WHEREFORE, Appellant respectfully requests that this Court grant the requested relief.

s/David W. Wolf  
David W. Wolf (S.C. Bar No. 17041)  
DAVID W. WOLF, P.A.  
748-D St. Andrews Boulevard  
Charleston, South Carolina 29407  
Tel. (843) 853-9000  
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s/Abby Edwards Saunders  
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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2026-00004358

Case No. 2024-CP-10-04606

Peter Skoler and Patricia Skoler, ..... Appellants,

v.

Vacation Inspirations, Destination Travel, LLC, Joseph Shirley, Randy Gardner, and Jeffrey Pumilia, ..... Respondents,

**PROOF OF SERVICE**

I certify that I have served the Appellant’s Motion To Consolidate Appeals, for Extension of Time, and for Leave to Exceed Page Limits on the above-named Respondents by email on April 9, 2026 addressed to counsel of record as follows:

John A. Massalon (SC Bar #10279)  
Wills Massalon & Allen LLC  
jmassalon@wmalawfirm.net

Date: April 9, 2026

s/David W. Wolf  
David W. Wolf (S.C. Bar No. 17041)  
DAVID W. WOLF, P.A.  
748-D St. Andrews Boulevard  
Charleston, South Carolina 29407  
Tel. (843) 853-9000  
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Email: [david@wolflaw.com](mailto:david@wolflaw.com)

s/Abby Edwards Saunders  
Abby Edwards Saunders (S.C. Bar No. 17234)  
Law Office of Abigail Edwards Saunders, LLC  
1021 Sea Mountain Highway, Suite B2

North Myrtle Beach, South Carolina 29582  
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Email: [abigail@abbysaunderslaw.com](mailto:abigail@abbysaunderslaw.com)

david@wolflaw.com

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**From:** John A. Massalon <jmassalon@wmalawfirm.net>  
**Sent:** Friday, April 3, 2026 2:48 PM  
**To:** david@wolflaw.com  
**Cc:** David David; Jeff Buncher  
**Subject:** RE: Extension to File Initial Brief and Designation of Matter

Apr 09 2026

SC Court of Appeals

David:

This confirms my consent to the extension requested. Let me know if you need anything else from me.

JM

John A. Massalon, Esq  
Wills Massalon & Allen, LLC  
P.O. Box 859  
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Charleston, SC 29401  
[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)  
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**From:** david@wolflaw.com <david@wolflaw.com>  
**Sent:** Thursday, April 2, 2026 6:16 PM  
**To:** John A. Massalon <jmassalon@wmalawfirm.net>  
**Subject:** Extension to File Initial Brief and Designation of Matter

John,

Per our call a short while ago, I wanted to write and request your confirmation of the requested extension of fifteen additional days to the current deadline to file the Appellants' Initial Brief and Designation of Matter in the Skoler and Perrelli matters.

I appreciate your cooperation and would commit to reciprocating if you want or need such an extension.

Many thanks,

David Wolf  
David W. Wolf, P.A.  
748-D St. Andrews Blvd.  
Charleston, SC 29407

Tel. (843) 853-9000  
Fax. (843) 853-9002

This message is from the law firm David W. Wolf, P.A. and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

DAVID W. WOLF, P.A.  
BUSINESS & COMMERCIAL LAW

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SC Court of Appeals

April 9, 2026

**VIA E-MAIL: [ctappfilings@sccourts.org]**

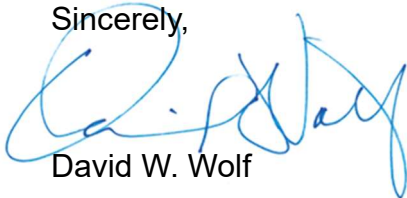
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Frank Perrelli, Appellant v. Vacation Inspirations, et. al, Respondents, Appellate  
Case No. 2026-000043

Dear Mrs. Kitchings:

Enclosed please find my firm's check No. 1035 for the filing fee for Appellant's Motion to Consolidate Appeals, For Extension of Time, and for Leave to Exceed Page Limits filed on April 9, 2026 for the above case. In addition to the Motion, a Proof of Service for the motion on the Respondents' counsel was also submitted via email at the time of filing. Please let me know if you need anything else from me.

Sincerely,



David W. Wolf

Enc. as stated

cc: John Massalon (jmassalon@wmalawfirm.net)  
Jeffrey Buncher (jeff@uricchio.com)  
Abigail Saunders (abigail@abbysaunderslaw.com)