

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, Appellant,
v.

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

**APPELLANT FRANK PERRELLI'S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Appellant Frank Perrelli by and through his undersigned counsel, proposes the following
be included in the Record on Appeal:

1. Order Granting Defendants' Motion to Compel Arbitration, filed July 23, 2025;
2. Order Denying Plaintiffs' Motion to Reconsider, filed December 12, 2025;
3. Plaintiff's Verified Complaint, filed September 13, 2024;
4. Defendants' Answer and Affirmative Defenses, filed November 4, 2024;
5. Transcript of Oral Argument on Motion to Compel Arbitration, dated March 27, 2025;
6. Defendants' Motion to Compel Arbitration, filed November 12, 2024;
7. Plaintiffs' Opposition to Defendants' Motion to Compel Arbitration, filed March 13, 2025;

8. Defendants' Support of Motion to Compel Arbitration, filed March 25, 2025;
9. Plaintiffs' Surreply in Opposition to Defendants' Motion to Compel Arbitration, filed March 26, 2025;
10. Plaintiffs' Proposed Order, dated April 3, 2025;
11. Defendants' Proposed Order, dated April 3, 2025;
12. Motion to Reconsider Order Compelling Arbitration, filed August 2, 2025;
13. Defendants' Opposition to Plaintiffs' Motion to Reconsider Order Compelling Arbitration, filed August 15, 2025;
14. Defendants' Amended Opposition to Plaintiffs' Motion to Reconsider Order Compelling Arbitration, filed September 04, 2025;
15. Reply to Defendants' Memorandum in Opposition to Plaintiffs' Motion to Reconsider Order Compelling Arbitration, filed September 10, 2025;
16. Verified Complaint in *Sawyer v. Vacation Inspirations*, No. 2024-CP-1002642 (S.C.Com.Pl.), filed on May 21, 2024;
17. Vacation Inspirations Membership Purchase Agreement with Christopher and Terese Sawyer dated May 27, 2021;
18. Verified Complaint in *Skoler v. Vacation Inspirations*, No. 2024-CP-1002646 (S.C.Com.Pl.), filed on May 21, 2024;
19. Vacation Inspirations Membership Purchase Agreement with Peter and Patricia Skoler dated March 21, 2022;
20. Assurance of Voluntary Compliance in *Sours v. The Vacation Station, LLC*, No. 2012-CV211716, filed Feb 20, 2012;
21. Press Release, "AG Paxton Reaches \$74K Agreement with San Antonio-Based Business, Texas v. Vacation Inspirations, LLC", No. 2017CI11368, dated June 22, 2017;
22. News Article, "Vacation club connected to prior settlements over consumer complaints," WCSC-TV, dated November 4, 2022;
23. South Carolina Department of Consumer Affairs, Complaints for Vacation Inspiration, dated January 28, 2026.

s/David W. Wolf

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