

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Thomas J. Rode, Circuit Court Judge

Appellate Court Case No. 2026-000910
Circuit Court Case No. 2024-CP-10-02642

Christopher Sawyer and Terese Sawyer,..... Appellants,

v.

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

CONSENT MOTION TO SUPPLEMENT THE RECORD ON APPEAL

Pursuant to Rules 212 and 240 of the South Carolina Appellate Court Rules (“SCACR”), Respondents Vacation Inspirations, Destination Travel, LLC, Joseph Shirley, Randy Gardner and Jeffrey Pumilia, with the consent of Appellants Christopher Sawyer and Terese Sawyer, respectfully move this Court for an order permitting the parties to supplement the Record on Appeal to include the following documents:

1. Affidavit of Randy Gardner filed in support of Respondents’ Motions to Compel Arbitration, dated March 24, 2025
2. Commercial Arbitration Rules of the American Arbitration Association, amended and effective September 1, 2022
3. Consumer Arbitration Rules of the American Arbitration Association, amended and effective February 21, 2018 and its Due Process Protocol dated April 17, 1998

4. Vacation Inspirations Membership Purchase Agreement with Christopher and Terese
Sawyer May 27, 2021

In support of this motion, the parties respectfully state the materials are relevant to the issues presented on appeal. While these materials were not explicitly included in the parties' Designations of Matter to be Included on Appeal, the parties agree their inclusion is necessary to accurately reflect the proceedings before the lower court. All parties consent to the supplementation of the record pursuant to Rule 212(b), SCACR.

WHEREFORE, the Respondents, with consent of Appellants, respectfully request this Court enter an order permitting the Record on Appeal to be supplemented to include the materials identified above and granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

s/John A. Massalon

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September 17, 2026

WE SO CONSENT:

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