

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Sep 23 2026

SC Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas
The Honorable Daniel E. Hunt, Special Referee

Case No. 2020-CP-39-00480
Appellate Case No. 2025-002085

Neal E. Pfeiffer and Paulette H. Pfeiffer,.....Plaintiffs,

vs.

Don Culff Homes, Inc.; Donald Cluff a/k/a Don Culff; Christopher
Pettross; Maria Petross a/k/a Maria Ferguson a/k/a Maria E. Ferguson;
The M. Ferguson Group, LLC; 103 Woodland Circle Partners, a South
Carolina General Partnership; World Business Lenders, LLC; Dina
Claire Culff; and WBL SPO II, LLC, Defendants,

Of which Christopher Pettross and Maria Ferguson are the Appellants,
and World Business Lenders, LLC; Neal Pfeiffer; Paulette Pfeiffer; and
WBL SPO II, LLC, are the Respondents.

**MOTION TO BE RELIEVED AS COUNSEL FOR
RESPONDENT WBL SPO II, LLC**

The undersigned counsel for Respondent WBL SPO II, LLC (“Respondent WBL”) hereby
moves the Court for an order relieving Demetri K. Koutrakos, Esquire and Harry A. Dixon, Esquire
as counsel for Respondent WBL only in the above-referenced appeal.

Respondent WBL submits that the granting of this Motion will not prejudice Appellants or
Respondent WBL, and that Hutchens Law Firm, LLP remains as counsel for Respondent WBL in
this appeal.

Respectfully submitted,

CALLISON TIGHE & ROBINSON, LLC

s/ Demetri K. Koutrakos

Demetri K. Koutrakos, SC Bar No. 11318

Harry A. Dixon, SC Bar No. 103509

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**ATTORNEYS FOR RESPONDENT
WBL SPO II, LLC**

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The M. Ferguson Group, LLC; 103 Woodland Circle Partners, a South
Carolina General Partnership; World Business Lenders, LLC; Dina
Claire Culff; and WBL SPO II, LLC, Defendants,

Of which Christopher Pettross and Maria Ferguson are the Appellants,
and World Business Lenders, LLC; Neal Pfeiffer; Paulette Pfeiffer; and
WBL SPO II, LLC, are the Respondents.

PROOF OF SERVICE

I hereby certify that, on this date, the **Motion to be Relieved as Counsel for Respondent WBL SPO II, LLC** was served upon counsel of record via AIS email, and upon the *pro se* Appellants via email and by depositing a copy of the same in the United States Mail at their last known addresses, with proper first-class postage affixed thereon, as follows:

John B. Kelchner, Esquire
Turner Padgett Graham & Laney, PA
P. O. Box 1473
Columbia, SC 29202
Email: jkelchner@turnerpadgett.com
*Attorney for Respondent World
World Business Lenders, LLC*

John S. Kay, Esquire
Hutchens Law Firm LLP
P. O. Box 8237
Columbia, SC 29202
Email: john.kay@hutchenslawfirm.com
*Attorney for Respondent
WBL SPO II, LLC*

Maria E. Ferguson
Christopher Pettross
103 Woodland Circle
Easley, SC 29640
Email: miapfp@yahoo.com
Email: chrispettross@gmail.com
Appellants pro se

I further certify that all parties required by Rule to be served have been served.

CALLISON TIGHE & ROBINSON, LLC

s/ Demetri K. Koutrakos
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Attorneys for Respondent WBL SPO II, LLC

September 23, 2026

DEMETRI "JIM" K. KOUTRAKOS MEMBER
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VIA EMAIL ONLY: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court
S. C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Christopher Pettross, *et al.* vs. World Business Lenders, LLC, *et al.*
Appellate Case No. 2025-002085

Dear Ms. Kitchings:

Enclosed herewith please find a Motion to be Relieved as Counsel for Respondent WBL SPO II, LLC, together with a Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email. This firm's check in the amount of \$50 in payment of the required fee will be delivered to your office.

The enclosed documents have been served upon counsel of record and the *pro se* Appellants today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

s/ Demetri "Jim" K. Koutrakos

Demetri "Jim" K. Koutrakos

DKK:ksr
Enclosures

cc (w/enc.): John B. Kelchner, Esquire (via email)
John S. Kay, Esquire (via email)
Christopher Pettross (via email and USPS)
Maria E. Ferguson (via email and USPS)
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