

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM PICKENS COUNTY**

Court of Common Pleas

Daniel E. Hunt, Special Referee

Appellate Case No. 2025-002085

Lower Court Case No. 2020-CP-39-00480

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

v.

Don Culff Homes, Inc., Donald Cluff a/k/a Don Culff, Christopher Pettross, Maria Pettross 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.

**APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**

Christopher Pettross and Maria Ferguson, Appellants, Pro Se

103 Woodland Circle, Easley, South Carolina 29640 | (864) 991-5473

Pursuant to Rule 209, SCACR, Appellants designate the following matters for inclusion in the Record on Appeal, to the extent permitted by Rule 210(c), SCACR:

1. Notice of Appeal and proof of service.

2. Appellants' stay and Rule 60(b) motion, with attachments and exhibits properly before the lower court.
3. Hunt's September 15, 2025 order denying stay and Rule 60(b) relief.
4. Hunt's February 25, 2025 Judgment of Foreclosure and Sale.
5. Lower-court materials concerning Hunt's prior attorney-client relationship with Maria Ferguson, including retainer payment evidence and any disqualification, recusal, waiver, or remittal materials.
6. Transcript, recording, or settled-statement portions addressing Hunt's prior representation, disqualification, recusal, waiver, or remittal.
7. Orders of Reference, appointment orders, and filed materials establishing Hunt's authority to act as Special Referee.
8. December 6, 2024 rulings relied upon by WBL as the basis for foreclosure and referral.
9. Attorney withdrawal, substitution, and attorney-of-record materials relevant to notice and opportunity to be heard.
10. October 18, 2024 Notice of Electronic Filing and associated certificates or proofs of service.
11. Hearing notices, service proofs, and transcript/recording portions relevant to the preserved notice, service, representation-status, and opportunity-to-be-heard issues.
12. Other lower-court pleadings, orders, exhibits, or transcript portions specifically relied upon by the September 15 order or necessary to resolve the preserved Rule 60(b) issues.

CERTIFICATION

By signing, Appellants certify under Rule 209(c), SCACR, that the designated matters are **relevant** and properly includable under Rule 210(c).

s/ Christopher Petross

Christopher Pettross, Pro Se Appellant

s/ Maria E. Ferguson

Maria E. Ferguson, Pro Se Appellant

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Date: September 29, 2026