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Sep 29 2026

SC Court of Appeals

**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, World Business Lenders, LLC, Dina Claire Culff, and WBL SPO II, LLC, Defendants,**

of whom Christopher Pettross and Maria Ferguson are Appellants.

**APPELLANTS' OPPOSITION TO DISMISSAL AND OVERBROAD REMAND,
REQUEST FOR ENLARGEMENT OF TIME, AND PRESERVATION OF RECORD
RELIEF**

**Appellants Christopher Pettross and Maria Ferguson, pro se, oppose dismissal and any
remand that would leave challenged proceedings unaffected, request any authorized enlargement
of time, and preserve available record relief.**

I. REQUEST THAT THE APPEAL NOT BE DISMISSED

**1. Appellants request that the Court decline dismissal and decide the issues properly presented
for review.**

2. Appellants have continuously pursued this appeal. Any delay or deficiency was not abandonment, consent to dismissal, or waiver.
3. If this return or related filing is untimely, Appellants request enlargement under Rules 240(e) and 263(b), SCACR.
4. Appellants do not claim additional time for service by mail, Rule 263(a), SCACR.

II. TRANSCRIPT AND RECORD ISSUES

5. Financial difficulty obtaining complete transcripts and uncertainty over custody of recordings have impeded, but not ended, Appellants' prosecution of the appeal.
6. Appellants seek only record relief authorized by Rules 209-212, SCACR, including supplementation under Rule 212(b) when specifically identified material is properly includable.

III. CHALLENGED SPECIAL REFEREE PROCEEDINGS

7. Appellants raised Hunt's prior attorney-client relationship with Maria Ferguson and the resulting disqualification issue below. They request review only to the extent preserved, within this Court's jurisdiction, and supported by the appellate record.
8. Any allegations characterized as fraud upon the court, extrinsic fraud, or unauthorized practice of law are not offered as established facts; Appellants request consideration only of preserved underlying acts and applicable law.

IV. OPPOSITION TO REMAND THAT WOULD PRESERVE CHALLENGED PROCEEDINGS

9. Appellants oppose a disposition that would leave challenged Special Referee proceedings insulated from review or treat remand as authorization for an immediate foreclosure sale beyond the Court's actual holding.

10. If remand is required, Appellants request a mandate stating what is vacated and preserving unresolved issues and lawful remedies.

V. REQUEST FOR RELIEF

WHEREFORE, Appellants request that the Court: (A) deny dismissal; (B) accept this filing and grant any authorized enlargement; (C) permit the appeal to proceed on preserved issues; (D) preserve appropriate record relief under Rules 209-212; and (E) if remand is necessary, limit it to the Court's actual disposition and grant other appropriate relief.

Respectfully submitted,

Date: September 29, 2026

s/ Christopher Pettross

Christopher Pettross, Pro Se Appellant

103 Woodland Circle, Easley, South Carolina 29640

Telephone: 864-991-5473

s/ Maria Elena Ferguson

Maria Elena Ferguson, Pro Se Appellant

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CERTIFICATE OF SERVICE

I certify that on September 29, 2026, I served a true and correct copy of the foregoing filing upon counsel of record by United States Mail, first-class postage prepaid, at the addresses below.

Demetri "Jim" K. Koutrakos, Esq. and Harry Dixon, Esq.

CALLISON TIGHE & ROBINSON, LLC

P.O. Box 1390, Columbia, SC 29202-1390

John S. Kay, Esq.

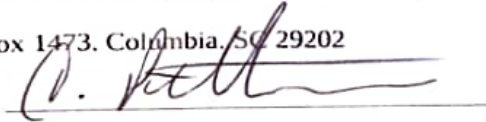
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John E. Kelchner, Jr., Esq.

TURNER PADGET GRAHAM & LANEY, P.A.

P.O. Box 1473, Columbia, SC 29202

A handwritten signature in black ink, appearing to read "C. Pettross", is written over a horizontal line.

Christopher Pettross, Pro Se Appellant

Date: September 29, 2026

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