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September 21, 2016

**RECEIVED**

SEP 22 2016

**S.C. SUPREME COURT**

The Honorable Daniel E. Shearouse  
Clerk of the South Carolina Supreme Court  
1231 Gervais Street  
Post Office Box 11330  
Columbia, S.C. 29211

Re: Wells Fargo Bank, N.A., Respondent  
v. Ronald P. Pappas and Camine Pappas, Appellants  
Appellate Case No. 2014-001505

Dear Mr. Shearouse:

Enclosed for filing please find (1) original and (1) copy of the redacted Appendix you requested on the above-referenced matter. Also enclosed please find (2) copies of the corrected date of Page 3 on the Certificate of Counsel in the Petition for Writ of *Certiorari*.

Sincerely Yours,

*JS*  
John Martin Foster

JMF/ens

cc: S. Sterling Laney, III  
Womble Carlyle Sandridge & Rice, LLP  
550 South Main Street, Suite 400  
Greenville, S.C. 29601  
Attorneys for Respondent  
864-255-5417

Pursuant to Rule 242, S.C.A.C.R, the Petitioners petition for the issuance of a writ of *certiorari* to review the final decision of the Court of Appeals in the matter above.

This Petition is based upon those certain points, factual and legal, which the Petitioners believes the Court of Appeals to have overlooked or misapprehended, as set out herein.

The Petitioners contend that this matter deals with what are, in South Carolina precedent, novel questions of law.

To the extent allowed, the Petitioners restate and by this reference reargues all matter set out in their Briefs and referenced in the Record on Appeal and in the Appendix submitted herewith.

### CERTIFICATE OF COUNSEL

Counsel for Petitioners certifies that the Petition for Rehearing herein was made and finally ruled on by the Court of Appeals on June 11, 2016.

### BACKGROUND

In May, 2006, the Petitioners RONALD P. PAPPAS and CAMINE PAPPAS purchased, as an investment, a residential lot in what was to be Edgewater, a new subdivision in Lancaster County, developed by Craft Development, LLC. The price was \$229,000.00. This subdivision did not perform as expected.

This lot was financed by the predecessor in interest to the Respondent WELLS FARGO BANK, N.A. with a note having a balloon payment in June, 2009. At closing, they were charged with the cost for an appraisal of the lot. They requested a copy of that appraisal. It was not supplied until this action was filed. No reason for that failure has been stated.

By January, 2008, complaints had been made to HUD alleging failures to comply with the Interstate Land Sales Full Disclosure Act by Craft Development.

In July, 2009, at the urging of the bank and upon expiration of the original Note, the Petitioners refinanced with the Bank at a figure of \$210,954.69. At the second closing, they were again charged with the cost for an appraisal of the lot. They again requested a copy of that appraisal. Discovery covering that document was served. This request was repeated, and acknowledged, during the Deposition of the Appellant RONALD P. PAPPAS. To date, they have not been supplied with that appraisal. This foreclosure action is premised upon the documents of the second closing.