

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2025CP1005095

JAMES C. (“CHRIS”) MCNEIL AND)
MEAGHAN POYER)
)
Plaintiffs)

V.)

SAC 181, LLC, MERIDIAN RESIDENTIAL)
GROUP, LLC, ADAM W. BAYLES,)
INDIVIDUALLY, TARA BAYLES,)
INDIVIDUALLY, AND MRG INVESTING)
COMPANY LLC)
)
Defendants)

**DEFENDANT SAC 181 LLC’S
MOTION FOR A CASE
MANAGEMENT ORDER
REGARDING THE USE OF AI**

Defendant SAC 181 LLC (“SAC 181”) by and through its undersigned counsel, hereby moves this Court, at such time and place as may be set by this Honorable Court to enter in this matter a Case Management Order Regarding the Use of AI. SAC 181 seeks a Case Management Order requiring the Parties in this matter to certify and disclose any use of generative AI in the preparation of any pleading, motion, brief, memorandum, or other document filed with the Court.

SAC 181 respectfully submits that a Case Management Order Regarding the Use of AI would be appropriate and in the best interests of the Parties and of the Court, as it would promote judicial efficiency and ensure accuracy in all future submissions in this matter.

WHEREFORE, for the reasons outlined above, SAC 181 respectfully requests that this Honorable Court enter in this matter a Case Management Order Regarding the Use of AI, including specifically entering the Proposed Case Management Order Regarding the Use of AI attached hereto as **Exhibit “A”**, and grant such other or further relief the Court deems just.

This the 10th day of November 2025.

Respectfully submitted,

/s/ Kevin M. O'Brien
Kevin M. O'Brien, SC Bar No. 100968
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Justine M. Tate, SC Bar No. 101561
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Attorneys for Defendant SAC 181 LLC

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COMPANY LLC)

Defendants)

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of Defendant SAC 181, LLC's Motion for a Case Management Order Regarding the Use of AI, to which this certificate is affixed, was served via electronic filing on November 10, 2025, to the following:

Alicia Noel Bolyard, Esq.
Christopher W. Manning, Esq.
Resnick & Louis, P.C.
146 Fairchild Street, Ste. 130
Charleston, SC 29492
Phone: 843.212.0435
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cmanning@rlattorneys.com

Counsel for Defendants Tara Bayles, Adam Bayles and Meridian Residential Group LLC

Jeffrey W. Kuykendall
Jeffrey William Kuykendall, Attorney at Law
321 Wingo Way, Ste. 201
Mount Pleasant, SC 29464

Phone: 848.790.5182
jeff@jwklegal.com

*Counsel for Defendant Meridian Residential
Investing Company LLC*

Furthermore, I do hereby certify that a true and correct copy of the Defendant SAC 181, LLC's Motion for a Case Management Order Regarding the Use of AI, to which this certificate is affixed, was served via electronic mail on November 10, 2025, to the following:

James C. ("Chris") McNeil
P.O. Box 30386
Charleston, SC 29417
Email: chris@thaut.io

and

Meaghan Poyer
P.O. Box 30386
Charleston, SC 29417
Email: mcneilandpoyer@gmail.com

Pro Se Plaintiffs

This the 10th day of November 2025.

/s/ Kevin M. O'Brien
Kevin M. O'Brien, Esq.

EXHIBIT

A

STATE OF SOUTH CAROLINA
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**PROPOSED CASE
MANAGEMENT ORDER
REGARDING THE USE OF AI**

Pursuant to the South Carolina Rules of Civil Procedure and the March 25, 2025, Interim Policy on the Use of Generative Artificial Intelligence ("AI") issued by the South Carolina Supreme Court, the Court hereby enters the following order:

1. **Scope and Applicability.** This Order shall apply to all parties, counsel, and representatives involved in the above captioned matter.
2. **Disclosure Requirement.** Any party, counsel, or representative who utilizes generative AI in the preparation of any pleading, motion, brief, memorandum, or other document filed with the Court must disclose the use of AI through a separate certification accompanying the filing.
3. **Disclosure Formatting.** This certification shall accompany any filing in this matter that uses AI, and, following the Certificate of Service, shall include a statement that AI was used in the filing, and shall include a detailed list identifying each and every citation in the

filing where generative AI was used, the date on which AI was used for such citation and the name and type of chatbot or transformer that was used to generate such AI.

4. **Citations and Research.** This certification shall also include a statement certifying that any AI generated citations used in such filing have been checked for accuracy.
5. **Confidentiality and Data Security.** Generative AI tools and systems may not be used to process or analyze confidential court records or privileged information unless expressly authorized by this Court or stipulated by all parties through written consent.
6. **Professional Responsibility.** Counsel and *pro se* parties shall remain fully responsible for the accuracy, integrity, and ethical compliance of all submissions. Counsel shall ensure that any use of AI does not violate the South Carolina Rules of Professional Conduct.
7. **Sanctions.** Any failure by any party to comply with the terms of this Order shall subject the party to appropriate sanctions, including but not limited to striking the party's pleadings, entry of judgment against the party, barring the party's presentation of evidence on some or all claims, holding the party in contempt, and/or award of attorney's fees.

Hon. Jennifer B. McCoy
Chief Administrative Judge, 9th Judicial Circuit

_____, 2025
Charleston County, South Carolina

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Hon. Jennifer B. McCoy
Chief Administrative Judge, 9th Judicial Circuit

_____, 2025
Charleston County, South Carolina