

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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.

)
) **IN THE COURT OF COMMON**
) **PLEAS**
) **NINTH JUDICIAL CIRCUIT**
)
) **Civil Action No. 2025-CP-10-05095**
)
) **PLAINTIFFS' EMERGENCY**
) **MOTION FOR HEALTH**
) **CONTINUANCE OF THE**
) **MAY 28, 2026 HEARING**
) **PENDING RULINGS ON**
) **FEDERALLY MANDATED ADA**
) **ACCOMMODATIONS AND**
) **THE PENDING MOTION**
) **FOR LEAVE TO FILE**
) **SECOND AMENDED**
) **COMPLAINT**
)

Plaintiffs James C. McNeil and Meaghan Poyer, appearing pro se, respectfully move this Honorable Court for an emergency health continuance of the hearing currently set for May 28, 2026. In support, Plaintiffs state as follows:

I. Introduction and Summary of Relief Requested

1. Plaintiffs request that the May 28, 2026 hearing be continued until such time as the Court issues formal rulings on (a) Plaintiff McNeil's pending request for federally mandated ADA accommodations (filed January 30, 2026; pending 117 days), and (b) Plaintiffs' pending Motion for Leave to File Second Amended Complaint (filed October 24, 2025; pending 214 days, and unopposed for the first 179 days).

2. This request is a medical necessity precipitated by the cumulative effect of (i) the Court's prolonged silence on the foundational protective motions needed for Plaintiffs to safely move forward, (ii) coordinated gaslighting by defense counsel that systematically minimizes an eight-count fraud and privacy case as a mere "deposit dispute," and (iii) the growing pattern of "captured systems" - including law enforcement agencies, insurance carriers, and multiple coordinated entities apparently motivated to suppress evidence threatening Meridian's PMIC-license and the Altman family portfolio - rising to the level of documented witness tampering and obstruction of an active LLR investigation.
3. The combined effect of these conditions has triggered severe escalation of Plaintiff McNeil's diagnosed PTSD, including recurring panic attacks rendering safe participation in the May 28 hearing medically impossible until baseline procedural safety is enabled.

II. Procedural Posture and Pending Foundational Motions

4. **The Pending Motion for Leave (214 days; unopposed for first 179 days).** On October 24, 2025, Plaintiffs filed a Motion for Leave to File Second Amended Complaint under Rule 15(a), SCRCP. The motion attaches the proposed Second Amended Complaint and exhibits documenting (a) the multi-platform syndication of unauthorized interior images of Plaintiffs and their elderly disabled dog across at least 25 real estate platforms, (b) Defendants' verified cross-claim admission establishing single-business-enterprise liability, and (c) the January 5, 2024 owner-awareness email establishing Charles S. Altman's individual ratification of Meridian's conduct. The motion sat unopposed for 179 days. Phelps Dunbar's opposition on behalf of SAC 181 (filed by Kevin O'Brien on April 21, 2026) is untimely on its face and should be stricken - leaving the Rule 15(a)

standard "shall be freely given when justice so requires" governing on an uncontested record. Rule 15(a)'s mandate, combined with the 179-day silence, leaves no proper basis for further delay.

5. **The ADA Accommodation Request (113 days pending).** On January 30, 2026, Plaintiff McNeil submitted a request for ADA accommodations based on diagnosed PTSD, as mandated by federal law (42 U.S.C. § 12131 et seq.; 28 C.F.R. § 35.130). The request remains unruled-upon for 117 days.
6. **Documented Defense Conduct in the Interim.** During this same period, defense counsel filed coordinated motions to quash third-party subpoenas, contacted AppFolio directly to instruct non-compliance with lawful discovery (raising obstruction issues under S.C. Code § 16-9-340 and 18 U.S.C. § 1512(b)(3)), delayed deposition of witness Stephanie Phillips to a date beyond what we understood to be the February 20, 2026 LLR investigation deadline, and pretending most of the harms never occurred, characterizing this originally eight-count case as a simple "deposit dispute" - a mischaracterization detailed in Plaintiffs' January 14, 2026 Opposition.

III. The Mechanism of Harm: Coordinated Gaslighting Against the Documentary Record

7. The defense's systematic minimization is documented. The following table reflects the coordinated narrative versus the record evidence Plaintiffs have placed before this Court:

Defense Narrative (Filed)	Record Evidence (Documented)
Phelps Dunbar (Jan. 12, 2026) -case is a "landlord-tenant dispute involving... the return of the related security deposit."	Falsified postal envelope (Ex. F-2) created Sept. 5, 2025 to mask § 27-40-410 noncompliance; checks actually mailed Sept. 8

Defense Narrative (Filed)	Record Evidence (Documented)
Resnick Louis / Bolyard (Jan. 8, 2026) - third-party subpoenas constitute "an irrelevant fishing expedition."	25+ platform syndication of unauthorized interior imagery of Plaintiffs, Plaintiff Poyer, and elderly disabled dog (Ex. C-4)
Defense (Collectively) - veil-piercing discovery is unwarranted.	SAC 181 OP account at Synovus signed by Tara Bayles (PMIC #83633) using Meridian's address — operational commingling violating S.C. Code § 40-57-136
Defense (Collectively) - case scope is narrow.	Eight-count Complaint including fraud, privacy torts, retaliatory eviction, and PMIC violations directly tied to active LLR investigation

8. **Witness Tampering and PMIC Obstruction.** As documented in Plaintiffs' January 14, 2026 Opposition to Motions to Quash, Meridian contacted AppFolio on or before January 9, 2026, instructing the third-party witness to refuse compliance with Plaintiffs' subpoena. AppFolio's January 12, 2026 email confirms Meridian provided "formal notice" to block production. This conduct satisfies the statutory elements of S.C. Code § 16-9-340 (obstruction of an authorized public official - LLR Investigator J. Watson Wharton III and/or Kasey Williams), 18 U.S.C. § 1512(b)(3) (witness tampering), and S.C. Code § 40-57-3403 (PMIC obstruction of investigation).
9. The clustering of defense conduct around what we understood to be the February 20, 2026 LLR statutory deadline - including motions to quash, witness tampering, and deposition delays past the deadline - demonstrates calculated obstruction of an active regulatory investigation into Tara Bayles' PMIC license, compounding the institutional betrayal that has triggered Plaintiff McNeil's panic episodes.

IV. The Health Impact and Institutional Betrayal

10. The clinical and procedural reality is detailed in the **Declaration of James C. McNeil (Exhibit A)**, published at the public live URL: <https://housingjusticeaudit.com/ptsd-and-the-missing-ada-accomodations> and incorporated herein by reference.
11. The Affidavit documents the sensory and physiological reality of PTSD escalation triggered by “didn’t happen” false narrative causing the necessary memory-maintaining regular reliving of the underlying retaliation, the forced relocation under 114-degree heat index conditions, and the subsequent compounding effect of coordinated institutional gaslighting and trauma erasure.
12. **Institutional Betrayal as Compounding Injury.** Established trauma research recognizes that when an institution charged with protecting an injured party instead facilitates further harm, the resulting psychological injury - Institutional Betrayal - exceeds the original trauma in severity. The Court's failure to rule on a 117-day-old federally mandated ADA request, while permitting defense counsel to run an unchecked attrition campaign, constitutes the precise condition that trauma literature identifies as catalyzing severe PTSD escalation.

V. The Reasonable Person Standard

13. When a citizen presents this Court with documented evidence of a falsified postal stamp, multi-platform syndication of his family's private life, coordinated witness tampering, and statutory PMIC violations, and the Court responds by leaving a 214-day-old Motion for Leave (unopposed for the first 179 days) and a 117-day-old federally mandated ADA accommodation request unrulèd-upon while defense counsel escalates obstruction - the

resulting physiological breakdown represents the natural and predictable response of any reasonable person under such conditions.

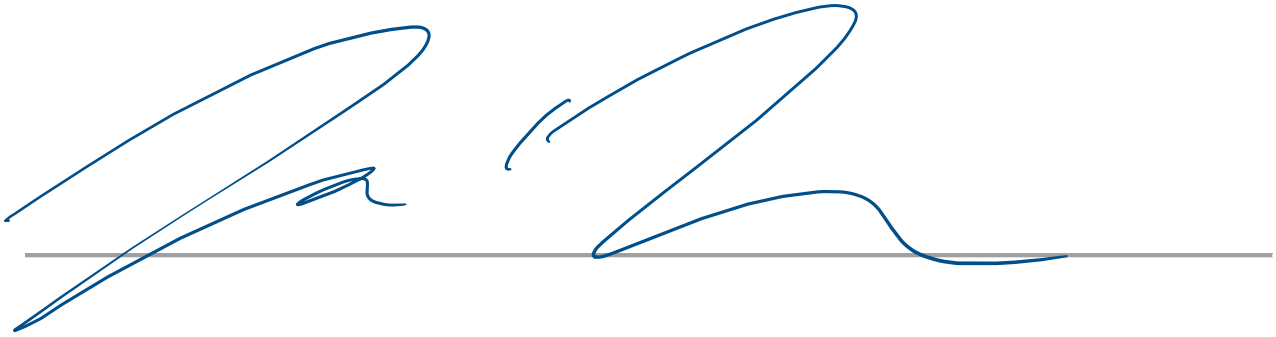
14. Plaintiffs intend to engage the substantive issues of this case. Plaintiffs seek a procedurally safe and lawful environment in which to argue them.

VI. Relief Requested

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. **Continue** the May 28, 2026 hearing on health grounds;
- B. **Rule** on the pending request for ADA accommodations (pending 117 days) prior to rescheduling;
- C. **Strike** Defendants' untimely opposition to the Motion for Leave (filed after 179 days of silence) and **rule** on the pending Motion for Leave to File Second Amended Complaint (pending 214 days) prior to rescheduling;
- D. **Reschedule** the continued hearing to a date that (i) follows expiration of the responsive pleading period for the Second Amended Complaint under Rule 15(a) and Rule 12, SCRCF, (ii) allows for the implementation of reasonable ADA accommodations, and (iii) permits meaningful participation by Plaintiffs; and
- E. **Grant** such other and further relief as the Court deems just and proper.

Respectfully submitted this 26th day of May, 2026.



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INDEX OF EXHIBITS

Exhibit	Title	Description
A	Declaration of James C. McNeil	Stream-of-consciousness declaration executed May 22, 2026, documenting the sensory and physiological reality of PTSD escalation, the institutional-betrayal compounding injury, and the procedural conditions giving rise to the request for continuance. Published at https://housingjusticeaudit.com/story and incorporated by reference.
B	SC Supreme Court Docket Anomalies	Documentation of the South Carolina Supreme Court's handling of the related Petition for Writ of Mandamus, Appellate Case No. 2026-000919, including the events table, supporting emails, docket-visibility prints, and the comparator Hicks case (2026-000915), demonstrating docket-handling irregularities relevant to the cumulative procedural posture.
B1	Events Table — SC Supreme Court Writ of Mandamus Handling	Chronological table of events and documents relating to the Petition for Writ of Mandamus, cross-referenced to filings in 2025-CP-10-05095 and 2026-000919.
B2	April 15, 2026 Email — Kristen Porter, SC Supreme Court	Acknowledgment of filing and assignment of Appellate Case No. 2026-000919.
B3	Exhibits L & M from Petition for Writ of Mandamus (No. 2026-000919)	Exhibits incorporated from the underlying Petition.
B4	May 11, 2026 Petitioners' Supplement Delivery Email	Email transmitting Petitioners' Status Report Supplement to the SC Supreme Court following the April 28, 2026 Return-Request Letter.
B5	May 11, 2026 Petitioners' Email Inquiring Why Petition Is Not on Public Docket	Petitioners' inquiry to the SC Supreme Court regarding docket visibility.
B6	May 11, 2026 Docket PDFs — Hicks Case 2026-000915	Two docket PDF prints from https://ctrack.sccourts.org/public/caseSearch.do establishing the public-docket presence of the Hicks comparator case.
B7	May 12, 2026 "Answers in Red" Email from SCSC	Email response from SC Supreme Court with attached Return and Certificate of Service from Charleston Common Pleas.

Exhibit	Title	Description
B8	May 13, 2026 Phone Call Notes — Kristen Porter, SCSC	Petitioner McNeil's contemporaneous notes from phone call with Kristen Porter, including Freemind mind-map screenshot.
B9	May 14, 2026 Email and Letter from SCSC Clerk Patricia Howard	Email from Kristen Porter transmitting Clerk Howard's response letter (2026-000919 - McNeil - Response.pdf).
B10	May 15, 2026 Petitioners' Response Email to SCSC Response	Petitioners' email responding to the SC Supreme Court's May 14, 2026 response.
B11	Folder Screenshot of SCSC Docket PDF Prints	Screenshots showing dates created and filenames of saved docket prints, including Hicks comparator folder.
B12	May 15, 2026 Targeted Docket Searches — SCSC Original Jurisdiction / Extraordinary Writ	Two PDF prints of targeted docket searches with and without "Exclude Closed" parameter.
B13	May 19, 2026 Identical Docket Searches Showing Hicks Case Removal	Two PDF prints of docket searches identical in parameters to Exhibit B12, demonstrating the disappearance of comparator case 2026-000915 from public view between May 15 and May 19, 2026.
B14	May 21, 2026 Email and Order from SCSC	Email from Kristen Porter transmitting the order in 2026-000919 (2026-000919 - McNeil.pdf and McNeil Filing 05.12.26.pdf).
C	South Carolina's Access-to-Justice Constitutional Crisis	Integrated analysis placing the procedural conditions in this matter inside South Carolina's measurable, state-level access-to-justice failure. Includes NCAJ Justice Index data (overall score 23.7/100; Self-Representation Index 18.1/100, ranked 47 of 52 jurisdictions), Top 10 / Bottom 10 jurisdiction tables, and the BLS-paired wage analysis demonstrating the non-zero-sum relationship between access-to-justice design and attorney compensation.
D	Federal Ripeness Posture and Off-Ramp for State-System Resolution	Documentation that the cumulative procedural posture has matured into a ripe predicate for uncaptured federal-level intervention under Title II of the ADA (42 U.S.C. § 12131 et seq.; 28 C.F.R. §§ 35.130, 35.134), 42 U.S.C. §§ 1983, 1985(2), 1986, and 12203, the structural-error doctrine, and federal abstention exceptions under <i>Younger v. Harris</i> , 401 U.S. 37 (1971); together with the off-ramp framing preserving state-system resolution and the trapped-actor acknowledgment.

EXHIBIT A

Declaration of James C. McNeil

as Published at HousingJusticeAudit.com/Story

Written as Stream-of-Consciousness self-reflection on May 20, 2026 while walking Sharky the puppy. Only lightly edited for clarity after.

Litigation Induced PTSD and the Missing ADA Accommodations

I struggle with PTSD. Certain sounds make my body feel like my skeleton is trying to jump out of my skin. I find myself avoiding certain things like checking email when I really should do it because of something that might trigger a memory that is traumatic. I feel the hard wood floor I slept on for 30 minutes at a time, a couple times a night, five days in a row when my wife and I had to move unexpectedly.

I'm also self-litigating a case against well-funded defendants who are represented by multiple law firms and attorneys. It's difficult here.

Federal law says that PTSD qualifies for ADA accommodations, but I have to drive into dense downtown Charleston, find parking, walk to the clerk of court's office, wait and manually file multiple documents, take them home and scan them, so I can have the stamped copy to manually serve to all counsel in the case. When I later review them when they show up on the docket, I see how bad they look compared to electronically filed defense counsel pleadings.

That's important when you have exhibits that are detailed, colorful and graphic such as screenshots of websites like Zillow, Redfin, and Realtor.com showing images of our private day-to-day family life, with both myself and my wife in casual, "bumming around" clothes and our old, blind dog Rocket in diapers - which he wears in the house because he's incontinent due to age.

These images were on at least 25 websites advertising a house for rent in a hot neighborhood in a hot city with a housing shortage for around 10 weeks before we even knew about them. We had given no permission and were not even aware that the property management company had possession of the still pictures that were taken when the previous property management company, Roadstead, did an "inspection". We knew about the virtual tour, but they told my wife they would use AI to remove us and our belongings. That didn't happen.

I suppose that was a big contributing factor to the PTSD that I did not have before this case started, as it gave a sense of the inner sanctuary of your private life being violated. It was retaliatory, I suppose, since there's not a single other unit that this company Meridian Residential Group has advertised - ever - that we've seen with tenants or their belongings in it. And, believe me, I looked.

When I sought explanations for my nervous breakdown of late January 2026, I learned that when traumatic events are negated by coordinated gaslighting by multiple parties, it compounds the harm because you have to continually relive the traumas just to hold your memories straight.

And those memories add up, including when I also butted heads with their assistant manager, Stephanie Phillips, multiple times when she tried to bully us by misrepresenting landlord-tenant laws. One time was to get immediate access for an inspection with less than 24 hours notice. She stated the law allowed that, but I knew better. She quit asking.

The other time was when she wrote that they didn't have to honor a clause in the lease giving us a certain amount of notification time to terminate, because they didn't have a copy with signatures.

Well, the property management company that they took over from did, and I provided a copy with our signatures. We had asked Roadstead for a copy with their signatures, but had never received it. Kind of like how we had asked for the replacement blinds that the house needed on almost every window, and that were promised when we toured it before signing the lease. We continued asking for those blinds until, a couple years in, we got an email saying that the owner had declined to replace the blinds.

I suppose you could say it's only cosmetic, but it's another privacy violation in that people walking down the road could easily look in the house. I suppose we could have budgeted for that, but since they said they would pay for it, it was a principle thing too.

These are the things I think about sitting in traffic waiting to get to the Clerk of Court's office.

I also think about how an attorney can just press a button to file and not only is it instantly docketed, but all the parties who file electronically are served at the same time.

And the digital uploads make for crisp with clean, clear graphics with all of the text indexable by Google or other search engines, unlike our filings which are scanned in on what seems to be a old Xerox copy machine like I remember from the second grade. The scan removes all detail and turns graphic color images into black and white line drawings with streaks across them.

And the electronically filed legal pleadings have neat blue text on the right showing they were electronically filed, marking them out as "proper". One could wonder if it's done deliberately so it's easy to ignore self-represented people's filings.

But doesn't the Constitution promise us equal access to justice? Does it? I keep asking myself that and rereading it. Then I read the National Center for Access to Justice report stating that there are 46 states that offer better access to justice by self-represented parties than South Carolina. Can't we do better?

I thought about the constitutional issues when Beth Atkins, who is an admin assistant to Chief Administrative Judge Van Slambrook, mischaracterized an all-parties copied communication (about the need to keep my wife and I safe with certain court actions) as "ex parte", which means improperly leaving parties out of a communication. Which was most decidedly not the case. Did she think I didn't know what "ex parte" meant? It was chilling as if to say "you aren't welcome

here”, which feels like the overriding theme of how Charleston’s Court of Common Pleas responds to parties who decide to file without an attorney.

Why would we need to be kept safe? We had made filings documenting the "false narrative captured system" we are dealing with, and the growing risk of the whistleblower role I found myself in as the captured or connected systems ensnared by the "didn't happen" false frame narrative revealed themselves one at time to include:

- IPG Insurance
- Phelps Dunbar LLP. a \$400M/year law firm,
- Resnick & Louis, P.C., a law firm with 27 offices,
- IPG Insurance Company
- Hiscox Insurance Company
- the SC Department of Labor, Licensing, and Regulation (so far, we'll see if they take the PMIC license of a property manager who allegedly did these things.
- The Charleston County Sheriff's Office
- Charles S. Altman, Jonathan S. Altman, and the Altman family's various property-holding entities
- The Post and Courier
- The Mayor's Office
- The Peninsula of Charleston luxury senior living community
- (at least some aspects of)The Charleston, SC Court of Common Pleas

I stumbled into the whistleblower role simply by documenting how all this happened the purpose of documenting access to justice for the vulnerable - and access to fair housing for the vulnerable - with a system study, since I saw a need for positive change in Charleston where the average rent is 57% of the average renter's income.

And if I thought then that there was a need for change, certainly know it now.

There is no access to justice for the vulnerable because the system is designed to prevent it.

And not only to not give people what they ask for ... but to punish them for asking. similar to how the housing situation we were in seemed designed to not give us what we asked for in terms of things we were promised like blinds, or things you would naturally expect, like being treated professionally rather than being lied to about what the law is, or being spoken to like an adult rather than getting a gaslighting email from someone you had never met before, whose husband you just spoken with about air conditioning issues, an email that stated that I should not talk to Adam about lease obligations because he's “only in maintenance”.

That seemed really odd since I could read for myself on his LinkedIn page and the bio on the Meridian Residential Group website that he's a co-founder with his wife Tara Bayles, and in client acquisition.

Fast forward from that email of September 6, 2024 to just after the forced move.

One of the trauma triggers began when I thought an air conditioner bearing had gone bad in the house we had to move into on short notice - a house that was already furnished, although we already had plenty of our own furniture. We felt we had to pick the first and only house we looked at because our SUV had been in the shop with electrical gremlins until just 10 days before we had to move.

Remember this is an unplanned move we didn't ask for.

Back to that sound: In that overcrowded house, where initially we couldn't even walk through the living room which was stacked nearly to the ceiling wall-to-wall, what I thought was an air conditioner bearing making this squeaking noise – grating like fingers on a chalkboard - was our poor old blind dog, Rocket, whimpering for hours because in that unfamiliar environment, he had gotten stuck under a couch and was hurt and terrified, unable to move, with this heavy weight pressing on him.

That was not an issue at 181 Gordon Street, where he had gradually grown more blind over the last three and a half years, which is about 24 years in dog years, but was still happy and well-adjusted because we had set up the house to accommodate him. We built routines around his disabilities.

Well, I should state that he was happy and well adjusted before the move, but not so much after.

Other triggers for the PTSD getting so bad was having to relive the trauma of having to move against your will in a heat wave where two dates were 114-degree heat index, without adequate planning, and feeling kind of shit on because we knew that their excuse of “owner wanting renovations” was a lie, since they immediately started showing the house to prospective tenants - before we even moved out.

I remember July 15 because that was the same day they did the virtual tour shoot for which my wife was promised that our images would be removed. It would be natural to ask “If you are renovating the house, why wouldn't you do an expensive virtual tour shoot AFTER the renovation?” And that same day, they scheduled a tour of the house that we had to get out of so they could “do renovations”.

So I wrote an email a couple of days later asking why, adding that we hadn't been late on rent in the five and a half years we've lived there - not one single time.

No answer.

I found out later that just two days after that email of July 17, 2025, they moved the rent price from \$3050 a month to \$5276 a month. And a week later it was taken off the market - although the ad stayed up with our images in it that I found months later.

So, we moved. Rocket was traumatized, but at least we're getting our deposits back, right? A month comes and goes, but no deposit return. So I email Tara Bayles asking for it. But I don't get the deposit in return. Instead, I get an image of a fake postal stamp as an explanation that they were already sent in time, with “..the checks were mailed August 28, 2025” and “I do not control USPS processing times.”

I should note that the scan of the checks and the envelope Tara attached had an interesting file name: Meridian Scanner_20250905_161321.pdf. As can be seen on Rocket's Fight, this was attached to an email dated Fri 9/5/2025 4:30 PM. Observant readers might take note of something interesting about that file name and the claim as to when the checks it scanned were mailed.

That's when I made a larger demand, and was told speak to their lawyer. I filed suit. Later that evening I heard from a lawyer - since Tara did not actually give me a lawyer's name, she just gave me a firm. But Eric Pettis really didn't do much, because he disappeared off the scene about a month later after going dark once I filed a motion to disqualify him, because he's representing naturally adverse parties - and that made no sense.

Then things really started. I got to meet Justine Tate, Kevin O'Brien and Alicia Bolyard, all of whom harassed me, gaslit me, misled me, and treated me with a level of contempt as if I were beneath their consideration as a human being. It had nothing to do with professional respect.

I don't know who they thought they were dealing with because I have a skillset of a strategic litigation consultant, through my business consulting work with systems thinking, and I also have the skillset of a PR oriented litigation consultant for controlling public narrative - only really probably even better because I'm the inventor of the platform called Strategic Thought Leadership and the accompanying STL Schema that trains AI in it so that new paradigms naturally propagate.

I was starting to sense that the whole system was against me when I got a letter from Judge Jennifer McCoy telling me to not file any more suggested judge orders, and that the court would ask for them, and that hearings would be set for those three motions.

This is the same Judge McCoy who made sure we didn't have two particular hearings, with continuances made under clearly documented false pretenses. I even documented those false pretenses for her, and made sure she could see them, in a motion that first time it happened, and she ignored that filing and gave the continuance the defense lawyers asked for while lying to her

by stated we had consented. We had conditionally consented, but they rejected those conditions, which means there was no consent.

That was a hearing that was going to be December 19. It's now May 19, and we still have not had a hearing. We're supposed to in 10 days. I don't trust it. I've seen how the court works now and not only have I seen it, I've documented it and not only have I documented, I've analyzed it as a system so the world can see that this is a system designed to harm the people it's supposed to serve, the vulnerable. And it makes it a crappy system for everybody to use, because that generates what my friend, the great systems thinker John Seddon, calls “failure demand”, the work you have to do because you didn't do something right to start with.

When the system obstructs innocent people who ask it for simple justice from getting it - so they have to file motions not only overcoming the obstruction, but also motions documenting the harassing and blockading tactics used by court staff themselves, along with these defense lawyers they collude with, to make sure you don't get justice, you get work piled upon work. And the court then blames us for the excessive filings their own system generated.

And there hasn't been a minute of accountability yet.

We'll see what Judge Wheeler does, but I'm not that hopeful given that I asked him a good week and a day ago to do some things ahead of this hearing that should have been done a long time ago. One of them is to grant a motion for leave to file a Second Amended Complaint - the one I had to file after I discovered the image publication after already filing the one Amended Complaint the court grants without having to ask permission.

But, per SC law, that permission is “freely given when justice so requires”. Yet, it sat unopposed on the docket for 179 days, at which point defense counsel Kevin O'Brien finally filed an opposition, after I sent a preview version of the Petition for Writ of Mandamus I was filing with the SC Supreme Court, which documented how outlandish that age was in the context of a type of motion that was sometimes granted same-day and almost always within a month. Now it's about 209 days old. Are you going to even take an opposition filed 179 days late seriously? What does that say to even give it any credibility when it's coming from what the court calls “unclean hands”? Defense is clearly documented as such, except they're court approved unclean hands.

So court approved obstruction is okay, and court approved waste is okay.

We've got a broken system that almost broke me simply for asking it for justice.

I'm very glad I turned it into system study and intervention because if there was ever a system that needed intervening in, this is it.

I'm still wondering when my ADA accommodations are coming. I think it's on day 110 tomorrow, and maybe only eight days since Wheeler knew about it, but that's not something you need a hearing for. It's something mandated by federal law. It's automatic, but it probably isn't as automatic when by giving it, the court acknowledges it participated in giving you a nervous breakdown for asking for justice - for using it for the purpose for which it was allegedly designed, for expecting there to be the equal access to justice the constitution guarantees.

And there's no excuse because I've removed the variable the culture seems to default to about "pro se" or self-represented parties: disorganized incompetence that creates a hassle the court has to deal with. That's not the case here - defense must have felt my filings were too good to not be a lawyer because they accused me of using AI immediately, with no evidence, and they made a filing about it that we call the "AI Paranoia Motion I" – a filing that misquoted South Carolina Supreme Court stance on AI and asked the court to force us to arduously document such use at every step..

Of course, there were no repercussions for these lawyers.

Nearly everybody uses AI on some level because you can't get away from its integration in search engines now ... but if they were implying I'm AI dependent, they demonstrated their own lack of competence because a simple docket check would have revealed a demonstration of my litigation competence - using Strategic Thought Leadership then as I do now - from 2020-2021, which is before ChatGPT came out.

That case's defendants included their own client, SAC 181, the house-holding LLC shell Charles S. Altman is Registered Agent of.

That's the same Charles S. Altman who is a law and real-estate insider, connected to the local media blackout of this case through his family having a financial relationship to the Peninsula of Charleston multi-billion-dollar luxury senior living project which is owned by a partnership including Evening Post Industries – the parent company of the Post and Courier.

His nephew, Jonathan S. Altman, is a financial beneficiary of the house as well, and Jonathan advises Mayor Cogswell on affordable housing from his seat on the Homeownership Initiative Commission.

That Second Amended Complaint, which has a thorough set of exhibits documenting evidence of misdeeds like the misrepresentation of the reason for the eviction, the mass syndicated distribution of private images without consent, the falsified postmark, the mishandling of corporate records, and the pattern evidence of public reviews of Meridian Residential Group, LLC. That pattern evidence includes the categories of Systematic Financial Exploitation, Communication Failures and Avoidance, Maintenance Neglect Creating Unsafe Conditions,

Retaliatory and Punitive Conduct, Corporate Culture Evidence, and Tara Bayles Personal Involvement.

Speaking of pattern evidence, the filing references a 2018 Indeed review stating management “made me feel like it was my job to ‘trick’ the resident so the company could make more money”. Meridian took over from Roadstead - per the January 5 2025 email – in December 2023. That email stated “The owner is aware”.

That “owner”, Charles S. Altman, is added as an individual defendant in the Second Amended Complaint we filed a “freely given when justice so requires” Motion for Leave for on October 24, 2025.

I’ve got a hard, gnawing feeling about this upcoming May 28, 2026 hearing.

How can we even have a meaningful hearing without the Second Amended Complaint in front of the Court?

And how can I be expected to keep participating in a system that creates a nervous breakdown and 76/80 PCL-5 “extreme” PTSD score then refuses to grant the Federally mandated ADA accommodations for the injury they created for over 110 days?

I’m going to keep participating in the system because I’m not just standing up for myself and my family. I’m standing up for everyone in this housing-crisis ridden city who is victimized by a system that has been hijacked for wealthy developers at everyone else’s expense.

And I have the skillset to do a system intervention to change things for the better. Which makes me responsible to do so when I see such injustice and can do something about it. I am.

If you are suffering from the housing crisis, I am here for you. I have to show it can be done, and I have to show the world how this system works so we can fix it together. I’m not stopping, so I just need to survive this until it gets to a jury trial. That sounds crazy, I know, to worry about “surviving” litigation. But I am serious.

But maybe there are a few people on the inside who similarly revere the principles of Justice and Equity at the heart of the legal system. I know of at least one, Judge Van Slambrook, but he’s surrounded by gatekeepers.

Maybe one or two others will see that there’s a better way and that a system designed from the point of view of the Most Vulnerable Member (MVM) is a better system for everyone who

participates in it. But how could they partner with me to make change when I'm involved in active litigation?

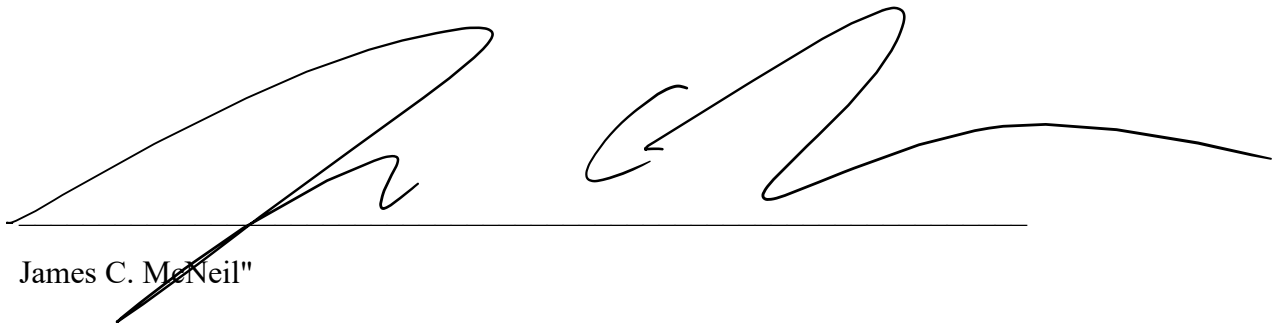
They can. I am creating a guide for that positive change that enables someone to partner with me in making things better without having to interact with me even once.

It's called the Housing Justice Audit and Intervention. Maybe Charles S. Altman will read it whenever he's added as an individual to the case, if the "freely given" leave is ever granted for the Second Amended Complaint.

I'm not holding my breath.

I declare under penalty of perjury under the laws of the State of South Carolina that the foregoing is true and correct.

Executed this 22nd day of May, 2026, at Charleston, South Carolina.



James C. McNeil"

EXHIBIT B

SC Supreme Court Docket Anomalies

EXHIBIT B1

SC Supreme Court Docket Anomalies

Summary and Table of Events & Documents

SC Supreme Court Writ of Mandamus Handling

Introduction to Exhibit B: Summary of Documented SC Supreme Court Docket Aberrations

This section summarizes the Plaintiffs' Notice of Aberrations, which documents critical administrative irregularities that have occurred at the South Carolina Supreme Court level regarding the public docket. Plaintiffs James McNeil and Meaghan Poyer initially prepared this information as a separate notice to support the foundational principles of the First Amendment right to access court records and judicial accountability. It is included here as an introduction to the evidentiary timeline provided in Exhibit B to contextualize the systemic barriers impacting the management of the underlying Common Pleas case (2025-CP-10-05095).

Background and the Discovered Discrepancy On April 15, 2026, Plaintiff McNeil filed a Petition for Writ of Mandamus (Appellate Case No. 2026-000919) regarding the trial court's administrative handling of his case, including a prolonged non-response to a federally mandated ADA accommodation request. On May 14, 2026, the Supreme Court Clerk's Office informed Plaintiff McNeil that his Petition was categorically excluded from the publicly accessible C-Track Appellate Case Management System.

In a courteous email on May 15, 2026, Plaintiff McNeil requested clarification, pointing out that other pending Extraordinary Writ matters involving pro se parties were actively displayed on the C-Track system. Specifically, he cited *Hicks v. South Carolina Department of Social Services* (Appellate Case No. 2026-000915).

The Docket Aberration Following Plaintiff McNeil's May 15 email identifying the inconsistency, the South Carolina Supreme Court Clerk's Office did not provide a substantive response. Instead, the *Hicks* case (Appellate Case No. 2026-000915), which was visible with a "Pending" status on May 15, was completely removed from the public C-Track system between May 15 and May 19, 2026. Direct queries for the case number returned "No records were found".

Plaintiffs are unaware of any specific, on-the-record sealing order supported by particularized findings that would constitutionally justify this removal. Therefore, the removal appears to be an administrative bypass of established constitutional processes regarding public docket access.

Relevance to the Current Matter The documented modification of the public docket bears directly on the trial court's management of this case for three distinct reasons:

* **Incorporation of Record:** The pending Writ of Mandamus incorporates Plaintiffs' Pre-Hearing Safety, Case Management, TRO, and Roster Reorganization Notice; any modification of the appellate record impacts the trial court's review of these matters.

* **Pattern of Modifying Evidence:** The administrative removal of the *Hicks* case supports Plaintiffs' allegations that the institutional response to surfacing inconsistencies is to modify evidence rather than substantively address the raised issues.

* **Urgency of ADA Accommodations:** This conduct underscores the urgency of Plaintiffs' ADA accommodation request, which has been pending without response for over 100 days. Plaintiff McNeil's unaccommodated disability places him at a structural disadvantage while navigating these institutional barriers.

The subsequent pages of **Exhibit B** provide the comprehensive "Case of the Missing Writ" events table, alongside full documentary evidence, email correspondence, and date-stamped C-Track screenshots validating these constitutional and procedural anomalies.

The Case of the Missing Writ - Events Table

Date	Event	Document(s)	Location(s)	2025-CP-10-05095 docket (Common Pleas)	2026-00919 docket (SCSC)
April 14, 2026	Petitioners Electronically Filed the <i>Petition for Writ of Mandamus</i> via email to SC Supreme Court	<i>Petition for Writ of Mandamus in Appellate Case No. 2026-000919</i>	Exhibit A of May 1, 2026 Plaintiffs' Notice (1)	Yes 5/1/26	No
April 15, 2026	Email from Kristen Porter, Case Management Specialist at SC Supreme Court, acknowledged filing and provided case number 2026-000919	<i>Petition for Writ of Mandamus in Appellate Case No. 2026-000919</i>	See above	Yes 5/1/26	No
		Email from Kristen Porter, Case Management Specialist at SC Supreme Court	EXHIBIT B2, following	This filing, Ex. B2	na
		Exhibits L&M from <i>Petition for Writ of Mandamus in Appellate Case No. 2026-000919</i>	EXHIBIT B3, following	This filing, Ex. B3	na
April 28, 2026	SC Supreme Court Issues Return Request to Charleston Common Pleas. They have 10 days to answer.	SC Supreme Court Return Request Letter to Charleston Common Pleas.	Exhibit B of May 1, 2026 Plaintiffs' Notice (1)	Yes 5/1/26	No
May 11, 2026	Petitioners emailed SC Supreme Court to file Supplement from Petitioners to SCSC	<i>Petitioners' Supplement</i> Delivery email to the SC Supreme Court	EXHIBIT B4, following	This filing, Ex B4	na
		<i>Petitioners' Status Report Supplement Following April 28, 2026 Return-Request Letter</i> (including the entire May 11, 2026 Plaintiffs' Notice filed with Common Pleas and all of its exhibits as Exhibit A)	Exhibit G of May 11, 2026 Plaintiffs' Notice (2)	Yes 5/11/26	No
May 11, 2026	Email to SCSC	Petitioners email SC Supreme Court to ask why Petition is not on docket.	EXHIBIT B5, following	This filing, Ex B5	na
May 11, 2026	SCSC Docket Check	Two docket pdf prints from https://ctrack.sccourts.org/public/caseSearch.do establish presence of Hicks case 2026-00915, which contradicts reason given for	EXHIBIT B6, following	This filing, Ex B6	na

Date	Event	Document(s)	Location(s)	2025-CP-10-05095 docket (Common Pleas)	2026-00919 docket (SCSC)
		Petitioners' Petition missing from publicly viewable docket.			
May 12, 2026	Email from SCSC	"Answers in Red" email responding to Petitioners (& attached Return from Charleston Common Pleas and Certificate of Service)	EXHIBIT B7, following	This filing, Ex B7	na
May 13, 2026	Phone call from SCSC - Kristen Porter from SC Supreme Court called Petitioner McNeil-	Notes from Phone call of May 13, 2026 with Kristen Porter of SC Supreme Court	EXHIBIT B8, following	This filing, Ex B8	na
May 14, 2026	Email from SC Supreme Court stating "Please see the attached response from the Clerk of the Supreme Court."	Email from Kristen Porter at the SC Supreme Court and attached Supreme Court Clerk of Court Patricia Howard's letter to Petitioners	EXHIBIT B9, following	This filing, Ex B9	na
May 15, 2026	Petitioners emailed SC Supreme Court	Email from Petitioners responding to SC Supreme Court Response	EXHIBIT B10, following	This filing, Ex B10	na
na	na	Folder Screenshot of SC Supreme Court docket prints (showing dates created and filenames)	EXHIBIT B11, following	This filing, Ex B11	na
May 15, 2026	SCSC Docket Check	Pdf prints of 2 targeted docket searches on SC Supreme Court	EXHIBIT B12, following	This filing, Ex B12	na
May 19, 2026	SCSC Docket Check	Pdf prints of 2 targeted docket searches on SC Supreme Court, identical to those printed May 15, 2026	EXHIBIT B13, following	This filing, Ex B13	na
May 21, 2026	Email from Kristen from SC Supreme Court, who wrote "Please see the attached order in the above referenced case."	Email from Kristen from SC Supreme Court and attached order 2026-000919 McNeil.pdf and McNeil Filing 05.12.26.pdf	EXHIBIT B14, following	This filing, Ex B14	na

(1) *Plaintiffs' Notice of Permanent Withdrawal of all Settlement Offers and Demand for Jury Trial* (filed May 1, 2026 at Charleston, SC Court of Common Pleas 2025-CP-10-05095)

- (2) *Plaintiffs' Notice of Pre-Hearing Safety and Case-Management Matters, Request for Temporary Restraining Order and Court-Ordered Forensic Audit of Altman-Controlled Entities, and Proposed Roster Reorganization for May 28, 2026 Hearing* (filed May 11, 2026 at Charleston, SC Court of Common Pleas 2025-CP-10-05095)
- (3) *Petitioners' Status Report Supplement Following April 28, 2026 Return-Request Letter* (filed May 11, 2026 via email to SC Supreme Court 2026-00919, Exhibit G of (2))

EXHIBIT B2

**Email of April 15, 2026 from Kristen Porter, Case Management
Specialist at SC Supreme Court**

RE: Filing: Petition for Writ of Mandamus - McNeil & Poyer v. Ninth Judicial Circuit Court of Common Pleas, Charleston County - Original Jurisd...

FileMessageHelpTell me what you want to do

Delete

Archive

Report

Reply

Reply All

Forward

All Apps

ahrefs

To Manager

Team Email

Move

Tags

Editing

Immersive

Translate

Zoom

Reply with Scheduling Poll

Delete

Report

Respond

Apps

Quick Steps

Move

Language

Zoom

Find Time

RE: Filing: Petition for Writ of Mandamus - McNeil & Poyer v. Ninth Judicial Circuit Court of Common Pleas, Charleston County - Original Jurisdiction

SC

Supreme Court Filings <supctfilings@sccourts.org>
To: chris.thaut.io; mcneilandpoyer@gmail.com

Reply

Reply All

Forward

Wed 4/15/2026 10:15 AM

You replied to this message on 4/15/2026 5:00 PM.

PDF

McNeil, James Mandamus Petition.pdf

369 KB

PDF

McNeil, James Mandamus Petition Cover Email.pdf

157 KB

PDF

McNeil, James Mandamus Petition Exhibits (only L and M).pdf

198 KB

PDF

McNeil, James Mandamus Petition Proof of Service.pdf

36 KB

Dean Mr. McNeil,

I have attached the stamped copies per your request. For your reference, your case number is 2026-000919.

Thank you,
Kristen

From: chris.thaut.io <chris@thaut.io>

Sent: Tuesday, April 14, 2026 3:04 PM

To: Supreme Court Filings <supctfilings@sccourts.org>

Cc: C&M McNeil <mcneilandpoyer@gmail.com>

Subject: Filing: Petition for Writ of Mandamus - McNeil & Poyer v. Ninth Judicial Circuit Court of Common Pleas, Charleston County - Original Jurisdiction, Rule 245, SCACR

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

To the Clerk of Court:

Please accept for filing the attached **Petition for Writ of Mandamus** and Proof of Service, submitted in the original jurisdiction of the Supreme Court of South Carolina pursuant to Rule 245, SCACR, S.C. Code Ann. Section 14-3-310, and Article V, Sections 5 and 20 of the South Carolina Constitution.

Petitioners: James C. ("Chris") McNeil and Meaghan Poyer, Pro Se
Respondent: Ninth Judicial Circuit Court of Common Pleas, Charleston County
Underlying Case No.: 2025-CP-10-05095

Please assign a case number and confirm receipt at your earliest convenience.

Petitioners respectfully request that a file-stamped copy of the Petition be returned via email to chris@thaut.io and mcneilandpoyer@gmail.com and that any correspondence or orders be directed to the addresses below.

EXHIBIT B3

Exhibits L&M from

***Petition for Writ of Mandamus* in Appellate Case
No. 2026-000919**

RECEIVED

Apr 14 2026

ST. SUPREME COURT

EXHIBITS INDEX

The following exhibits from the underlying case record are incorporated by reference and available to this Court upon request:

Exhibit A: Motion for Leave to File Second Amended Complaint (filed October 24, 2025, with the proposed Second Amended Complaint, with all its exhibits, as Exhibit A)

Exhibit B: Supplemental ADA Accommodations Motion (filed January 30, 2026)

Exhibit C: Chief Administrative Judge Van Slambrook's April 2, 2026 Order (Judgment Form 4)

Exhibit D: Judge McCoy's March 26, 2026 Continuance Letter

Exhibit E: Court Docket Entries Showing Selective Ruling Timeline

Exhibit F: Court Staff Email Thread (March 23-26, 2026) Demonstrating Administrative Gatekeeping

Exhibit G: Plaintiffs' Brief in Aid of Safety Risk Mitigation and Judicial Clarity (filed March 20, 2026)

Exhibit H: Plaintiffs' Supplemental Notice to Chief Administrative Judge (filed March 27, 2026)

Exhibit I: PCL-5 Clinical Documentation (76/80 Score)

Exhibit J: December 3, 2025 Memorandum and December 11, 2025 Supplemental Memorandum (Probate Valuation/Asset Discovery)

Exhibit K: Motion to Relieve Justine Tate as Counsel (filed April 2, 2026; granted April 7, 2026)

Exhibit L: Comparative Analysis of Motions for Leave to Amend, Ninth Circuit Court of Common Pleas [ATTACHED]

Exhibit M: Summary of Peer-Reviewed Research on Pro Se Bias and Representation Disparities in Housing Courts [ATTACHED]

EXHIBIT L

**Comparative Analysis of Motions for Leave to Amend,
Ninth Circuit Court of Common Pleas**

Ninth Circuit Court of Common Pleas — Charleston County

Motions for Leave to Amend: Comparative Ruling Timeline

A sample of Motions for Leave from Source: Charleston County Public Index

Party / Case No.	Motion Type	Filed	Days / Status
Lennar Carolinas LLC (2022CP1004509)	Leave to Amend Answer & File 3rd Party Complaint	3/2/2023	0
Midtown Townhomes HOA (2022CP1004509)	Leave to File Amended Complaint	9/3/2025	0
ECC Contracting LLC (2022CP1004509)	Motion to Amend	9/16/2025	1
Hall, Summer B (2023CP1002649)	Leave to Amend	3/17/2026	2
Baker Roofing Company LLC (2024CP1000043)	Amend Answer to Complaint	12/13/2024	3
Easterday, Andrea Lynn (2024CP1004874)	Leave to Amend	3/15/2026	Ungranted — 24+ days
Calcote, Thomas D (2024CP1002016)	Leave to Amend Answer	2/20/2025	39
Montague Hospitality LLC (2025CP1002455)	Leave to Amend	2/26/2026	Ungranted — 41+ days
PSMS 6 LLC (2024CP1000043)	Leave to Amend	2/24/2026	Ungranted — 43+ days
Easterday, Andrea Lynn (2024CP1004874)	Leave to File Amended Summons & Complaint	3/27/2025	54
Nywenning, Kurt (2025CP1001653)	Leave to File 2nd Amended Complaint	8/8/2025	60
Lennar Carolinas LLC (2024CP1004874)	Leave to Amend Answer	8/14/2025	69
Midtown Townhomes HOA (2022CP1004509)	Leave to File Amended Complaint (Amended Motion)	9/28/2023	83
Roina, Lisa (2025CP1005175)	Leave to Amend to Add Party	10/27/2025	128
McNeil & Poyer v. SAC 181, LLC et al. (2025CP1005095) — Pro Se	Leave to File 2nd Amended Complaint	10/24/2025	Ungranted — 166+ days

Note: Rows highlighted in orange indicate motions currently ungranted as of April 8, 2026. McNeil & Poyer (gold) is the only unopposed motion for leave in the dataset still unruled beyond 60 days. Median ruling time for granted motions: 39 days. McNeil & Poyer: 166+ days ($4.3 \times$ median).

EXHIBIT M

Summary of Peer-Reviewed Research on Pro Se Bias and Representation Disparities in Housing Courts

- **The Signaling Effect of Pro Se Status.** Empirical research published in *Law & Social Inquiry* demonstrates that a claimant's pro se status itself sends a signal that biases decision-making about the claimant and her claim. Researchers conducted controlled experiments with the public (N=157), law students (N=198), and practicing attorneys (N=39), holding case quality and merit constant. They found that pro se status influences stereotypes of claimants and reduces settlement awards — and critically, that this bias effect is exacerbated by socialization in the legal profession. Among law-trained individuals, pro se status generates negative stereotypes that directly explain adverse outcomes. See Quintanilla & Cain, "The Signaling Effect of Pro Se Status," 42 *Law & Soc. Inquiry* 1554 (2017).
- **The Justice Gap in Housing Cases.** A landmark study of Boston housing courts found that when both parties were represented, tenants retained possession of their homes two-thirds of the time. When tenants were unrepresented against represented landlords, that rate fell to one-third - an effective error rate of 33 percent, attributable to representation disparity rather than case merit. See D. James Greiner & Cassandra Wolos Pattanayak, "Randomized Evaluation of the Effects of Legal Representation," 121 *Yale L.J.* 2118 (2012). At least eight additional studies across different courts over 40 years confirm this pattern: unrepresented tenants consistently fare worse than represented tenants regardless of the merits.
- **The Scale of the Problem.** The Legal Services Corporation's Justice Gap report documents that 92% of low-income Americans receive no legal aid in civil cases; approximately 74% of those are eviction-related. In Philadelphia, landlord representation rates reach 80% while tenant representation rates are 6%. See LSC, "The Justice Gap: Measuring the Unmet Civil Legal Needs of Low-Income Americans" (2022). Research from Princeton University confirms that increases in legal representation lead to measurably better outcomes for tenants in housing court - tenants with lawyers are considerably less likely to face possessory judgments or have eviction warrants issued. See Cassidy & Currie, "The Effects of Legal Representation on Tenant Outcomes in Housing Court" (2022).
- **Inequality Cascades into Systemic Instability.** Thomas Piketty's research demonstrates that the sharp rise in inequality after 1980 helped lay the groundwork for the 2008 financial collapse. World Bank research confirms that countries where inequality is rampant tend to grow more slowly and recover more slowly after recessions, with direct links to political instability and civil conflict. See Piketty, *Capital in the Twenty-First Century* (2014); World Bank Group, "Piketty, Stiglitz and Our Renewed Interest in Inequality" (2015). The housing justice context is a microcosm of this dynamic: when systems designed to protect vulnerable members instead punish them for asserting rights, the resulting instability cascades through housing markets, social services, and ultimately the court system itself through increased failure demand - unnecessary litigation generated by the failure to do right by the end user at the first point of contact.

The Court's Opportunity. This Petition presents this Court with an opportunity to address - through the exercise of its supervisory authority - the kind of systemic pattern that peer-reviewed research identifies as both measurable and correctable. Compelling the circuit court to perform its ministerial duties without regard to litigant representation status reinforces the foundational principle that the courthouse door opens equally for all

EXHIBIT B4

***Petitioners' Supplement* Delivery email to the SC Supreme Court of
May 11, 2026**

From: chris@thaut.io
To: [Supreme Court Filings](#)
Cc: [C&M McNeil](#)
Subject: Filing: Petitioners' Supplement Following April 28, 2026 Return-Request Letter | Appellate Case No. 2026-000919
Date: Monday, May 11, 2026 1:44:00 PM
Attachments: [2026-05-11-Supplement-Following-April-28-Return-Request-2026-000919.pdf](#)

To the Clerk of Court:

Please accept for filing the attached:

- **Petitioners' Supplement Following April 28, 2026 Return-Request Letter in Appellate Case No. 2026-000919, McNeil v. Ninth Judicial Circuit Court.**

Petitioners attach the filed supplement and its exhibit materials, including:

- as **Exhibit A** the full Notice filed today in Charleston County Court of Common Pleas in underlying Case No. 2025-CP-10-05095.

Petitioners respectfully request that a file-stamped copy of the supplement be returned via email to **chris@thaut.io** and **mcneilandpoyer@gmail.com**, and that any correspondence or orders continue to be directed to those addresses, consistent with Petitioners' earlier filing email of April 14, 2026.

Respectfully,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

— — — — —

Chris McNeil
Founder, Thaut
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Mobile 843.818.3495
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Host of Podcast: *Thought Leadership Studio*

Forthcoming: *Strategic Thought Leadership: The Book*

LinkedIn

<https://www.linkedin.com/in/chris-mcneil-chs/>

EXHIBIT B5

**Petitioners email of May 11, 2026 to SC Supreme Court to ask why
Petition is not on docket.**

From: chris.thaut.io
To: [Supreme Court Filings](#)
Subject: Status Inquiry and Request for Copy - Appellate Case No. 2026-000919
Date: Monday, May 11, 2026 1:58:00 PM

To the Clerk of Court:

Petitioners write regarding **Appellate Case No. 2026-000919**. On April 28, 2026, the Supreme Court requested that the Charleston County Clerk of Court serve and file a return addressing the status of Petitioners' pending motions within ten days of the letter.

Petitioners respectfully request written clarification on the following:

1. Petitioners are not presently finding the Petition on the public docket. Please advise when it will appear, or whether any additional step is needed from Petitioners for docket visibility.
2. Did the Charleston County Clerk of Court serve and file the requested return within the ten-day period stated in the Court's April 28, 2026 letter?
3. If a return was received, please send Petitioners a copy by email, or advise how Petitioners may obtain it promptly.

Because Petitioners wish to maintain a clear written record, email response is preferred.

Petitioners may follow up by phone after sending this inquiry if helpful.

Sincerely,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

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Host of Podcast: [*Thought Leadership Studio*](#)

Forthcoming: [*Strategic Thought Leadership: The Book*](#)

LinkedIn

<https://www.linkedin.com/in/chris-mcneil-chs/>

EXHIBIT B6

Two docket pdf prints from

<https://ctrack.sccourts.org/public/caseSearch.do>

establish presence of Hicks case 2026-00915, which contradicts reason given for Petitioners' Petition missing from publicly viewable docket.

Hicks is an unrepresented party appearing on an Extraordinary Writ with the SC Supreme Court of South Carolina

Hicks case number 2026-00915 disappeared from the public docket
between May 15 and May 19. 2026.

Cases

Case Search

Participant Search

Disclaimer: The Information and documents available here should not be relied upon as an official record of action.
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

Case Search

Court: Supreme Court ▼

Case Title:

Filed Date From:

05/01/2025



Group: ▼

Appellate Case No.:

Filed Date To:

05/11/2026



Type: ▼

Exclude Closed Cases: ☐

Search

1 to 50 of 396 rows are displayed. Next

Search Results

▲ Court ▼	▲ Appellate Case No. ▼	Short Title	▲ Group ▼	▲ Type ▼	▲ Subtype ▼	▲ Filed Date ▼	▲ Status ▼
Supreme Court	2026-001105	Brandon Jewel Lee v. State	Certiorari - PCR	Common Pleas	Other	05/08/2026	Pending
Supreme Court	2026-001101	Larry A. White v. State	Certiorari - PCR	Common Pleas	Other	05/07/2026	Case Transferred
Supreme Court	2026-001096	Troy A. Burkhardt v. State	Certiorari - PCR	Common Pleas	Other	05/07/2026	Awaiting Transcript
Supreme Court	2026-001090	The State v. Jason B. Bell	Certiorari - COA	General Sessions	Other	05/06/2026	Awaiting Responses
Supreme Court	2026-001087	Justin Jamal Lewis v. State	Certiorari - PCR	Common Pleas	Other	05/04/2026	Pending
Supreme Court	2026-001085	Montez T. Drayton v. State	Certiorari - PCR	Common Pleas	Other	05/06/2026	Pending
Supreme Court	2026-001079	Courtney Sease v. State	Certiorari - PCR	Common Pleas	Other	05/05/2026	Pending
Supreme Court	2026-001066	Wesley E. Smith, III v. Sidney H. Pratt	Certiorari - COA	Common Pleas	Other	05/04/2026	Decision Filed
Supreme Court	2026-001054	Dean A. Arender v. Kent H. Oliver	Certiorari - COA	Common Pleas	Other	04/30/2026	Awaiting Responses
Supreme Court	2026-001040	Timiya Rashad Massey v. State	Certiorari - PCR	Common Pleas	Other	04/28/2026	Awaiting Transcript
Supreme Court	2026-001038	Town of Sullivan's Island v. Nathan Bluestein	Certiorari - COA	Common Pleas	Other	04/27/2026	Awaiting Responses
Supreme Court	2026-001036	James F. Russell v. State	Certiorari - PCR	Common Pleas	Other	04/27/2026	Pending
Supreme Court	2026-001034	Lindy Lamont Jones, Jr. v. State	Certiorari - PCR	Common Pleas	Other	04/27/2026	Decision Filed
Supreme Court	2026-001013	Kenneth S. Hoffman v. Saad Holdings, LLC	Certiorari - COA	Common Pleas	Other	04/24/2026	Awaiting Responses
Supreme Court	2026-001012	Chamar D. Scott v. State	Certiorari - PCR	Common Pleas	Other	04/24/2026	Pending
Supreme Court	2026-001005	Linda Kennedy v. Lake Hartwell Resort and Cabins, LLC	Certiorari - COA	Common Pleas	Other	04/24/2026	Decision Filed
Supreme Court	2026-001002	Mitch Randall Yawn v.	Certiorari - COA	Common Pleas	Other	04/23/2026	Awaiting Responses

Supreme Court	2026-001000	Dorchester County Jaden I. Gary v. State	Certiorari - PCR	Common Pleas	Other	04/23/2026	Awaiting Petition for Writ of Certiorari and Responses
Supreme Court	2026-000985	The State v. Terrell D. Herbert	Certiorari - COA	General Sessions	Other	04/23/2026	Ended
Supreme Court	2026-000963	David Quintan Jones v. State	Certiorari - COA	Common Pleas	Other	04/17/2026	Awaiting Responses
Supreme Court	2026-000960	The State v. Jharaun M. Washington	Certiorari - COA	General Sessions	Other	04/17/2026	Awaiting Responses
Supreme Court	2026-000959	George William Rauton, III v. Patsy R. Lightle	Certiorari - COA	Common Pleas	Civil Appeal from Summary Ct.	04/17/2026	Awaiting Responses
Supreme Court	2026-000957	Robert Belle v. William Leach	Certiorari - COA	Common Pleas	Civil Appeal from Summary Ct.	04/17/2026	Awaiting Responses
Supreme Court	2026-000952	Taylor Chasey Robertson v. SCDPS	Certiorari - COA	Common Pleas	Other	04/17/2026	Awaiting Responses
Supreme Court	2026-000950	The State v. Marc Y. McKeiver	Certiorari - COA	General Sessions	Other	04/17/2026	Awaiting Responses
Supreme Court	2026-000949	The State v. Trevor A. Irvin	Certiorari - COA	General Sessions	Other	04/17/2026	Awaiting Responses
Supreme Court	2026-000940	Derell D. Wiggins v. State	Certiorari - PCR	Common Pleas	Other	04/16/2026	Pending
Supreme Court	2026-000927	Lisa Cruz v. Heyward Bouknight	Certiorari - COA	Common Pleas	Other	04/15/2026	Awaiting Responses
Supreme Court	2026-000924	The State v. Michael L. Watts	Certiorari - COA	General Sessions	Other	04/15/2026	Awaiting Responses
Supreme Court	2026-000915	Rodney Ajaira Hicks v. South Carolina Department of Social Services, et al.	Orig. Jur. and Writs	Extraordinary Writ	Public Access	04/14/2026	Pending
Supreme Court	2026-000900	The State v. Jarius M. Sanders	Certiorari - COA	General Sessions	Other	04/13/2026	Ready for Consideration
Supreme Court	2026-000897	Sheila Gaddist v. Ss Lake City 168 LLC Dba Summerville Station Apartments	Certiorari - COA	Common Pleas	Civil Appeal from Summary Ct.	04/13/2026	Awaiting Responses
Supreme Court	2026-000892	The State v. Phillip R. Lawson	Certiorari - COA	General Sessions	Other	04/13/2026	Awaiting Responses
Supreme Court	2026-000867	Erick E. Wells v. State of South Carolina	Certiorari - COA	Common Pleas	Other	04/10/2026	Ready for Consideration
Supreme Court	2026-000865	The State v. Jonathan C. Dawkins	Certiorari - COA	General Sessions	Other	04/10/2026	Awaiting Responses
Supreme Court	2026-000863	Gloria Ormand-Ward v. Chicago Title Insurance Company	Certiorari - COA	Common Pleas	Other	04/09/2026	Awaiting Responses
Supreme Court	2026-000850	Wanda Whetstone v. Office of the Governor	Certiorari - COA	Common Pleas	Other	04/09/2026	Ready for Consideration

Supreme Court	2026-000843	Sarah Rock v. Dog Daze of Charleston, LLC	Certiorari - COA	Common Pleas	Other	04/09/2026	Awaiting Responses
Supreme Court	2026-000841	Thomas Burkhardt v. State	Certiorari - PCR	Common Pleas	Other	04/08/2026	Awaiting Transcript
Supreme Court	2026-000837	Michael P. Buckmon v. State	Certiorari - PCR	Common Pleas	Other	04/08/2026	Awaiting Transcript
Supreme Court	2026-000823	Adam Shoop v. State	Certiorari - PCR	Common Pleas	Other	04/06/2026	Awaiting Transcript
Supreme Court	2026-000821	Penland Automotive, LLC v. Dealer Financial Holdings, LLC	Certiorari - COA	Common Pleas	Other	04/03/2026	Awaiting Responses
Supreme Court	2026-000818	Preston R. Oates v. State	Certiorari - PCR	Common Pleas	Other	04/02/2026	Pending
Supreme Court	2026-000800	The State v. Kenneth Moorehead	Certiorari - COA	General Sessions	Other	04/01/2026	Awaiting Transcript
Supreme Court	2026-000777	Lamarcus A. Stewart, Jr. v. State	Certiorari - PCR	Common Pleas	Other	03/30/2026	Awaiting Transcript
Supreme Court	2026-000776	The State v. Eric A. Graham	Certiorari - COA	General Sessions	Other	03/30/2026	Awaiting Responses
Supreme Court	2026-000773	Elizabeth Heatley v. Mariner's Cay Marina Condo, LLC	Certiorari - COA	Common Pleas	Other	03/30/2026	Ready for Consideration
Supreme Court	2026-000770	The State v. William L. McKinney	Certiorari - COA	General Sessions	Other	03/30/2026	Awaiting Responses
Supreme Court	2026-000767	Tristan W. Ramey v. State	Certiorari - PCR	Common Pleas	Other	03/27/2026	Awaiting Petition for Writ of Certiorari and Responses
Supreme Court	2026-000763	Tammy D. Brown v. State	Certiorari - PCR	Common Pleas	Other	03/27/2026	Awaiting Transcript

1 to 50 of 396 rows are displayed. [Next](#)

Cases

Case Search

Participant Search

Disclaimer: The information and documents available here should not be relied upon as an official record of action.
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

Case Information: 2026-000915

Court:	Supreme Court	Classification:	Orig. Jur. and Writs - Extraordinary Writ - Public Access
Short Title:	Rodney Ajaira Hicks v. South Carolina Department of Social Services, et al.	Case Status:	Pending
	View Full Title		
Consolidated:			
Filed Date:	04/14/2026	Oral Argument Date:	
Disposition Date:		Disposition Type:	
Remittitur Date:			
Lower Court or Tribunal:			

- Party Information

Appellate Role	Party Name	Former	Attorney(s)
Petitioner	Rodney Ajaira Hicks	N	Fletcher N. Smith, Jr.
Respondent	Kizzie Oglesby	N	Sarah Marie Coldiron
Respondent	South Carolina Department of Social Services	N	Sarah Marie Coldiron

Views

Display: Descending  [Go!](#)

Event Information

Filed Date	Event Information	Doc
04/14/2026	Petition for Extraordinary Writ/Relief and Responses - Petition	

EXHIBIT B7

**May 12, 2026 “Answers in Red” email responding to Petitioners
and attached Return and Certificate of Service
from Charleston Common Pleas**

Petitioners were previously unaware the Charleston County Clerk of Court had responded due

To USPS service to unrepresented parties – mailed on May 8, not received until May 12.

From: Supreme Court Filings <supctfilings@sccourts.org>
Sent: Tuesday, May 12, 2026 10:25 AM
To: chris thaut.io
Subject: RE: Status Inquiry and Request for Copy - Appellate Case No. 2026-000919
Attachments: Return (4).pdf; Certificate of Service (3).pdf

Good morning,

Below in red are the answers to your questions regarding your pending case.

Thank you,
Kristen

From: chris thaut.io <chris@thaut.io>
Sent: Monday, May 11, 2026 1:58 PM
To: Supreme Court Filings <supctfilings@sccourts.org>
Subject: Status Inquiry and Request for Copy - Appellate Case No. 2026-000919

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

To the Clerk of Court:

Petitioners write regarding **Appellate Case No. 2026-000919**. On April 28, 2026, the Supreme Court requested that the Charleston County Clerk of Court serve and file a return addressing the status of Petitioners' pending motions within ten days of the letter.

Petitioners respectfully request written clarification on the following:

1. Petitioners are not presently finding the Petition on the public docket. Please advise when it will appear, or whether any additional step is needed from Petitioners for docket visibility. **Original Jurisdiction cases are not posted on public ctrack.**
2. Did the Charleston County Clerk of Court serve and file the requested return within the ten-day period stated in the Court's April 28, 2026 letter? **Yes, the return was filed on May 8th and the certificate of service states it was mailed to you.**
3. If a return was received, please send Petitioners a copy by email, or advise how Petitioners may obtain it promptly. **I have attached a copy of the return that was filed May 8, 2026.**

Because Petitioners wish to maintain a clear written record, email response is preferred.

Petitioners may follow up by phone after sending this inquiry if helpful.

Sincerely,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

— — — — —

Chris McNeil
Founder, Thaut
Systems Thinking-Based Business and Litigation Consulting
Strategic Thought Leadership
Mobile 843.818.3495
<http://thaut.io>
Host of Podcast: *[Thought Leadership Studio](#)*

Forthcoming: *[Strategic Thought Leadership: The Book](#)*

LinkedIn
<https://www.linkedin.com/in/chris-mcneil-chs/>

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# **EXHIBIT B8**

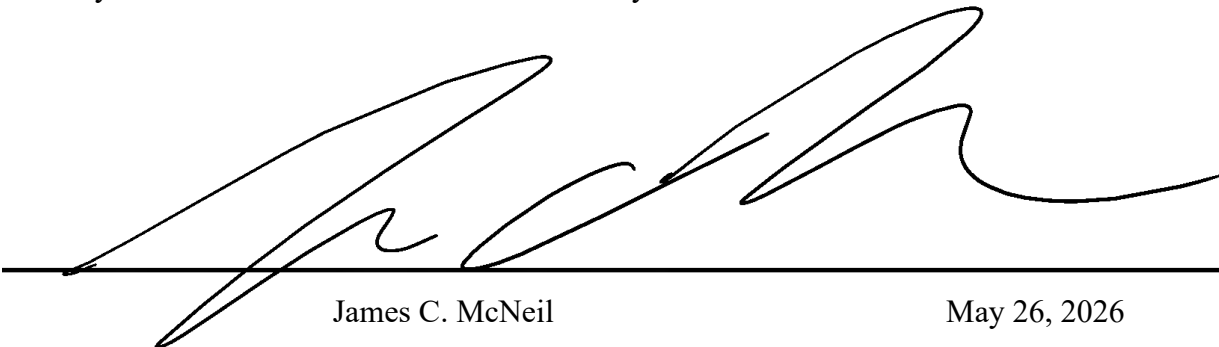
**Notes from Phone call of May 13, 2026 with Kristen Porter of SC  
Supreme Court**

**Notes from Phone call of May 13, 2026 between  
Petitioner McNeil  
and  
Kristen Porter of SC Supreme Court**

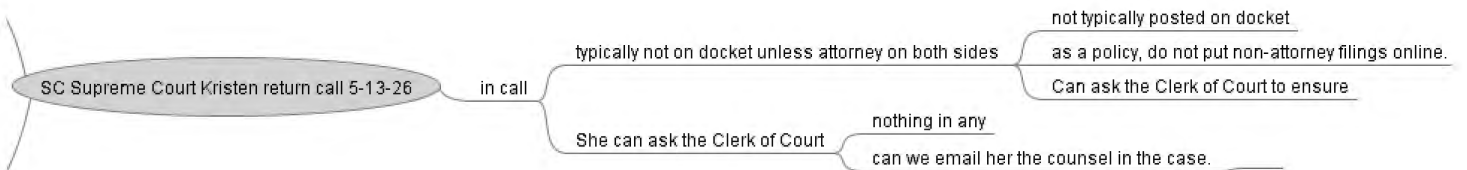
Ms. Porter stated, in effect, that “as a policy, they do not put non-attorney filings online.”

And that “both parties have to have counsel for the filing to be publicly visible”,  
which is contradicted by the Hicks case 2026-00915.

I certify that the above is correct to the best of my recollection:

  
James C. McNeil May 26, 2026

**Screenshot of Freemind mind map Petitioner McNeil took notes on  
during call:**



**Worthy of note: Kristen Porter of the SC Supreme Court has consistently been  
professional and pleasant to deal with.**

# **EXHIBIT B9**

**Email from Kristen Porter at the SC Supreme Court and attached  
Supreme Court Clerk of Court Patricia Howard's letter to Petitioners**

**From:** [Supreme Court Filings](#)  
**To:** [chris thaut.io](#)  
**Cc:** [holly.beeson@llr.sc.gov](#); [McCoy, Jennifer B.](#); [mcneilandpover@gmail.com](#); [Rode, Thomas J.](#); [Van Slambrook, Dale E.](#); [eknisley@charlestoncounty.org](#); [alhethington@charlestoncounty.org](#); [abolyard@rlattorneys.com](#); [cmanning@rlattorneys.com](#)  
**Subject:** Response to Request  
**Date:** Thursday, May 14, 2026 1:34:01 PM  
**Attachments:** [2026-000919 - McNeil - Response.pdf](#)

---

Please see the attached response from the Clerk of the Supreme Court.

Thank you,  
Kristen

**From:** chris thaut.io <chris@thaut.io>  
**Sent:** Wednesday, May 13, 2026 5:24 PM  
**To:** Supreme Court Filings <supctfilings@sccourts.org>  
**Subject:** (Counsel of Record in Underlying Action) RE: Status Inquiry - Appellate Case No. 2026-000919 - One Follow-Up Question

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good afternoon Kristen,

Thank you for the call this afternoon and for explaining the policy regarding non-attorney filings and the visibility distinction on the public docket. Petitioners appreciate the clarification and the courtesy of your offer to follow up with the Clerk of Court tomorrow.

As I mentioned, I would be happy to certify that there is nothing inappropriate for public filing. In the interest of complete transparency and for your Clerk of Court's consideration, the Supplement does contain one address - that of Charles S. Altman, at 39 Wappoo Creek Place, Charleston, SC 29412 - which appears in connection with the January 12, 2026 early mortgage payoff documentation referenced in the filing. Petitioners surface this proactively because the Altman address is already a matter of public record through the Charleston County Register of Deeds (Book 0644, Page 555, recorded June 12, 2017, and the Day Book record of 1/12/2026), the same primary-source documents Petitioners attached as exhibits.

Petitioners are happy to address this specifically in any certification or affidavit the Clerk's office may request, including by attesting that no other personal addresses, and no dates of birth, Social Security numbers, financial account numbers, or other categories typically subject to redaction under Rule 41.1, SCRCP, appear in the Supplement or its exhibits.

Petitioners offer this certification to provide the Clerk's office with a reasonable assurance mechanism that reduces clerk-side line-by-line review while preserving the policy's underlying protective purpose. Petitioners understand that the policy exists for the benefit of self-represented filers who may not realize what should be redacted, and Petitioners are happy to bear the burden of certification so that the Clerk's office does not have to bear the burden of

verification.

As you requested, below is the list of parties and counsel of record in the underlying action, *McNeil & Poyer v. SAC 181, LLC et al.*, Case No. 2025-CP-10-05095, Charleston County Court of Common Pleas. All Defendants are represented by counsel; Plaintiffs proceed Pro Se.

**Case Caption:** *James C. ("Chris") McNeil and Meaghan Poyer v. SAC 181, LLC; Meridian Residential Group, LLC; Adam W. Bayles, individually; Tara Bayles, individually; and MRG Investing Company LLC* **Case No.:** 2025-CP-10-05095 (Charleston County Court of Common Pleas, Ninth Judicial Circuit)

---

**Plaintiffs (Pro Se):**

- James C. ("Chris") McNeil — [chris@thaut.io](mailto:chris@thaut.io)
  - Meaghan Poyer — [mcneilandpoyer@gmail.com](mailto:mcneilandpoyer@gmail.com)
  - P.O. Box 30386, Charleston, SC 29417
  - Phone: 843-818-3495 [ppl-ai-file-upload.s3.amazonaws.com](https://ppl-ai-file-upload.s3.amazonaws.com)
- 

**Defendants and Counsel of Record:**

**SAC 181, LLC** — represented by **Kevin O'Brien, Esq.** (SC Bar No. 100968), Phelps Dunbar LLP

- Address: 4300 Edwards Mill Rd., Suite 600, Raleigh, NC 27612
- Phone: (919) 789-5300
- Email: [kevin.o'brien@phelps.com](mailto:kevin.o'brien@phelps.com)
- Firm site: <https://www.phelps.com/offices/raleigh.html>

**Meridian Residential Group, LLC; Adam W. Bayles (individually); and Tara Bayles (individually)** — represented by **Alicia Bolyard, Esq.** (SC Bar No. 103737), and Christopher Manning, Esq. (SC Bar No. **104848**), Resnick & Louis, P.C.

- Address: 146 Fairchild St., Suite 130, Daniel Island, SC 29492
- Phone: (843) 212-0435
- Emails: [abolyard@rlattorneys.com](mailto:abolyard@rlattorneys.com) , [cmanning@rlattorneys.com](mailto:cmanning@rlattorneys.com)
- Firm site: <https://rlattorneys.com/locations/charleston/>

**MRG Investing Company LLC** — represented by **Jeffrey R. Kuykendall, Esq.**, independent practitioner

- Address: 321 Wingo Way. Ste. 201. Mount Pleasant, SC 29464
- Phone: [843-790-5182](tel:843-790-5182)

- Email: [jeff@jwklegal.com](mailto:jeff@jwklegal.com)
- 

Please let Petitioners know if any further information would assist your review or the Clerk of Court's. Petitioners are happy to provide additional documentation as needed.

Thank you again for your continued courtesy and professionalism.

Sincerely,

James C. McNeil & Meaghan Poyer

Plaintiffs Pro Se

PO Box 30386

Charleston, SC 29417

Email: [chris@thaut.io](mailto:chris@thaut.io); [mcneilandpoyer@gmail.com](mailto:mcneilandpoyer@gmail.com)

Telephone: (843) 818-3495

— — — — —  
  
Chris McNeil

Founder, Thaut

Systems Thinking-Based Business and Litigation Consulting

Strategic Thought Leadership

Mobile 843.818.3495

<http://thaut.io>

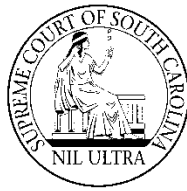
Host of Podcast: [\*Thought Leadership Studio\*](#)

Forthcoming: [\*Strategic Thought Leadership: The Book\*](#)

LinkedIn

<https://www.linkedin.com/in/chris-mcneil-chs/>

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The Supreme Court of South Carolina

PATRICIA A. HOWARD
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

BLAIRE CANN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA
29211
1231 GERVAIS STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1080
FAX: (803) 734-1499
www.sccourts.org

May 14, 2026

James C. McNeil
PO Box 30386
Charleston SC 29417

Re: James C. "Chris" McNeil, et al. v. Ninth Judicial Circuit Court of
Common Pleas, et al.
Appellate Case No. 2026-000919

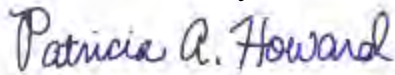
Dear Mr. McNeil,

This responds to your request that the above-referenced case be displayed on C-Track Public Access. Please be advised that absent extraordinary circumstances, only certain case types are available on the public access site, including:

1. Appeals from the Court of Common Pleas.
2. Appeals from the Court of General Sessions.
3. Appeals from Administrative Tribunals such as the Administrative Law Court and the Workers' Compensation Commission.
4. Certiorari proceedings relating to the decisions of the Board of State Canvassers.
5. Certiorari proceedings to review decisions of the South Carolina Court of Appeals (excluding Family Court cases).
6. Certiorari proceedings in Post-Conviction Relief Cases (excluding Family Court Cases).
7. Certification of Questions of Law by a federal court or state appellate court.
8. Original Actions filed in the Supreme Court.

Extraordinary writs filed with the Supreme Court, including petitions for a writ of mandamus, are not available on C-Track Public Access. One of the reasons this classification is not currently available is because many filings in such cases contain personal identifying information (such as social security numbers, and banking information), and the appellate courts do not have sufficient staff to ensure that all personal identifying information is redacted. Accordingly, your request will not be granted at this time. Over time, however, the South Carolina Judicial Branch intends to increase the types of cases that are available. The ultimate goal is to provide web-based access which will approach the level of access available to the public at the courthouse.

Sincerely,



CLERK

cc:

Holly Palmer Beeson

Edward L. Knisley, Jr.

Andrew LaRoche Hethington

Alicia Noel Bolyard

Christopher William Manning

Meaghan Poyer

The Honorable Thomas J. Rode

The Honorable Jennifer Blanchard McCoy

The Honorable Dale E. Van Slambrook

EXHIBIT B10

Email from Petitioners responding to SC Supreme Court Response

From: chris thaut.io
Sent: Friday, May 15, 2026 3:49 PM
To: 'Supreme Court Filings'
Cc: holly.beeson@llr.sc.gov; McCoy, Jennifer B.; mcneilandpoyer@gmail.com; Rode, Thomas J.; Van Slambrook, Dale E.; eknisley@charlestoncounty.org; alhethington@charlestoncounty.org; abolyard@rlattorneys.com; cmanning@rlattorneys.com
Subject: RE: Response to Request
Attachments: 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf; 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf; 2026-05-14-Appellate-Case-No-2025-000524-Mahdiv-Stirling.pdf

Good afternoon Kristen,

Thank you for forwarding the May 14, 2026 response from Clerk Howard regarding Appellate Case No. 2026-000919.

Petitioners write to seek clarification on what appears to be a substantial discrepancy between the May 14 response and the operational behavior of C-Track Public Access itself, to confirm the docketing status of Petitioners' May 11 Supplement, and to request a public-verification letter that would mitigate a safety and First-Amendment concern Petitioners raise more fully below.

I. The Documented Inconsistency on C-Track Public Access

The May 14 response states that "[e]xtraordinary writs filed with the Supreme Court, including petitions for a writ of mandamus, are not available on C-Track Public Access," and offers as the stated rationale that "many filings in such cases contain personal identifying information (such as social security numbers, and banking information), and the appellate courts do not have sufficient staff to ensure that all personal identifying information is redacted."

A C-Track Public Access case search performed on May 14, 2026, filtered to Court = Supreme Court, Group = Orig. Jur. and Writs, Type = Extraordinary Writ, with closed cases included, returns 16 publicly visible cases spanning April 2024 through April 2026.

Of particular note, the publicly accessible case-detail page for **Appellate Case No. 2025-000524, Mikal D. Mahdi v. Bryan P. Stirling, Director, etc.**, shows:

- Classification: "Orig. Jur. and Writs - Extraordinary Writ - Death Penalty"
- A named Respondent (Bryan Peter Stirling) listed as "Self Represented"
- Multiple publicly downloadable case documents, including incoming correspondence with a federal court, outgoing correspondence sending out an order on habeas corpus, and the Dispositional Decision (Order on Petition for Habeas Corpus)

Screenshots of the C-Track search results (both the five-row "exclude closed cases" view and the 16-row "include closed cases" view) and the Mahdi case-detail page are attached for reference.

Petitioners' May 13, 2026 phone conversation with you indicated that the operative distinction may be between represented and self-represented parties. The Mahdi matter, however, includes a Self-Represented Respondent with publicly downloadable documents, which does not fit either the categorical exclusion stated in the May 14 letter or the represented/unrepresented distinction described in the May 13 phone conversation.

II. Clarification Requests

1. What is the formal C-Track classification basis under which Appellate Case No. 2025-000524 and the 15 other identified Extraordinary Writ matters are publicly displayed, given the categorical language of the May 14 response?
2. Given that 2025-000524 includes a Self-Represented Respondent and publicly downloadable documents - both features that, on the rationale stated in the May 14 letter and in the May 13 phone conversation, would militate against public display - what is the operative distinction that places 2025-000524 on public access while excluding 2026-000919?
3. If the operative distinction is in fact represented-versus-self-represented party status, what is its formal source (statute, court rule, administrative order, or internal Clerk's office policy)?
4. Petitioners renew the offer to provide the Clerk's office with a sworn certification under Rule 41.1, SCRPC - including the proactive disclosure of the Charles S. Altman public-record address noted in prior correspondence - that would address any individualized redaction concerns and place 2026-000919 on equivalent procedural footing with the 16 visible Extraordinary Writ matters identified above.

III. Supplement Status Confirmation, Request for Stamped Copy, and Procedural Path Forward

Petitioners also respectfully request confirmation that the Supplement filed via email to suptfilings@sccourts.org on May 11, 2026 (with cover letter and exhibits) was received and docketed in Appellate Case No. 2026-000919. Petitioners ask because no acknowledgment of receipt has issued, in contrast to the April 15, 2026 acknowledgment of the original Petition, which included a stamped copy of the filed document.

Regardless of the Supplement's current docketing status, Petitioners respectfully request a stamped copy of the Supplement as filed, consistent with the courtesy extended on April 15, 2026 with respect to the original Petition, as confirmation of the filed record.

If the Supplement was not received or was not docketed, Petitioners respectfully request:

1. **A brief explanation of the reason the Supplement was not docketed** (e.g., transmission issue, procedural classification question, pending review, or other administrative cause), so that Petitioners can address any procedural deficiency in any re-filed submission; and
2. **Feedback from the Clerk's office on the matter if there is any reason preventing Petitioners from proceeding by filing a Renewed Supplement** that consolidates the content of the original May 11 Supplement with Petitioners' Reply to the Charleston County Clerk of Court's May 8, 2026 Return into a single, superseding document. This consolidated procedural vehicle would streamline the record, avoid duplicative or overlapping filings, and ensure that the Court has the

full, current factual and procedural posture in one place. If the Supplement was not docketed and Petitioners do not receive advice to the contrary, Petitioners will file the Renewed Supplement within several business days with the implicit understanding that this procedural path is acceptable, and request a stamped copy upon docketing.

Petitioners' preference for the consolidated Renewed Supplement is grounded in the procedural economy it offers all parties and the Court. If the Clerk's office or the Court prefers that Petitioners instead file the Reply to Return as a separate procedural vehicle (with or without a re-filed Supplement), Petitioners will of course defer to that guidance.

IV. Public-Verification Letter Request and First-Amendment Concerns

Petitioners respectfully request that the Clerk's office issue a brief public-verification letter - suitable for sharing with journalists, researchers, and other members of the public - confirming the existence, appellate case number, parties, and basic procedural status of Appellate Case No. 2026-000919. Petitioners make this request for the following reasons:

- **First**, the underlying matter (Charleston County Common Pleas Case No. 2025-CP-10-05095) has experienced a documented local-press blackout despite involving allegations of substantial public concern, including falsified postal evidence, corporate-veil and asset-discovery issues against multi-million-dollar development interests, and procedural irregularities across multiple branches of South Carolina state government. Petitioners anticipate that national press inquiry will be required to break the local blackout and to bring the case before the public who have a right to know about this case concerning housing rights in a city with a documented housing crisis.
- **Second**, Petitioners have well-documented safety concerns arising from their litigation posture against well-resourced and politically connected parties. The public visibility of press exposure has historically been recognized as among the most effective protective mechanisms available to whistleblowers and litigants in their position. The First Amendment's protection of the right to petition, the right to publish, and the press's right of access to government processes is implicated where a public-records system displays a category of cases as a matter of routine but excludes Petitioners' case under rationales that the system's own contents contradict. Without the ability for press to verify on the public docket where they'd expect to see such a filing, the credibility loss could cost public exposure that would have helped mitigate the high risk of the whistleblowing function of Petitioners, who are dealing with a captured false-narrative system on the verge of collapse as the well documented and publicly available evidence comes face to face with the false narrative that "this didn't happen".
- **Third**, in the absence of C-Track Public Access display, a journalist's standard verification path is structurally broken. A reporter who calls the Clerk's office to confirm the existence of Appellate Case No. 2026-000919 may be told the case is not visible on the public system - which, without further explanation, reads as "no such case exists." That outcome serves neither the public interest in accurate reporting nor the appellate court's interest in being understood as a transparent institution.

A public-verification letter - confirming only the existence, case number, parties (by short caption), and procedural status, with no disclosure of protected content - would resolve the verification gap, mitigate the safety risk arising from the press-blackout posture, and uphold the First Amendment principles that animate public access to court records. Petitioners note that the May 14 response from Clerk Howard

already substantially serves this function and could simply be supplemented or reissued with explicit authorization for press use.

V. Closing

Petitioners ask these questions and make these requests simply to ensure that:

- The operative classification framework is understood by Petitioners and by similarly situated self-represented South Carolinians;
- Petitioners are not subject to a visibility standard that the C-Track system itself demonstrates is not categorically applied;
- The May 11 Supplement's docketing status is confirmed so that Petitioners can properly sequence forthcoming filings, including the Reply to the Charleston County Clerk of Court's May 8 Return that Petitioners are preparing for filing in the coming days;
- Petitioners retain the public-verification path necessary to mitigate safety risks and to exercise First-Amendment-protected rights of petition and publication.

Petitioners appreciate the Clerk's office's continued courtesy and professionalism throughout this matter and look forward to your response.

Sincerely,

Chris McNeil

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

— — — — —

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<http://thaut.io>
Host of Podcast: *Thought Leadership Studio*

Forthcoming: *Strategic Thought Leadership: The Book*

LinkedIn
<https://www.linkedin.com/in/chris-mcneil-chs/>

Attachments:

1. C-Track Public Access search results, Extraordinary Writ filter, excluding closed cases (5 rows) - May 15, 2026 (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf)
2. C-Track Public Access search results, Extraordinary Writ filter, including closed cases (16 rows) - May 15, 2026 (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf)
3. C-Track Public Access case-detail page, Appellate Case No. 2025-000524 (Mahdi v. Stirling) - May 14, 2026 (2026-05-14-Appellate-Case-No-2025-000524-Mahdiv-Stirling.pdf)

From: Supreme Court Filings <supctfilings@sccourts.org>

Sent: Thursday, May 14, 2026 1:34 PM

To: chris thaut.io <chris@thaut.io>

Cc: holly.beeson@llr.sc.gov; McCoy, Jennifer B. <jmccoyj@sccourts.org>; mcneilandpoyer@gmail.com; Rode, Thomas J. <trodej@sccourts.org>; Van Slambrook, Dale E. <dvanlambrookj@sccourts.org>; eknisley@charlestoncounty.org; alhethington@charlestoncounty.org; abolyard@rlattorneys.com; cmanning@rlattorneys.com

Subject: Response to Request

Please see the attached response from the Clerk of the Supreme Court.

Thank you,
Kristen

From: chris thaut.io <chris@thaut.io>

Sent: Wednesday, May 13, 2026 5:24 PM

To: Supreme Court Filings <supctfilings@sccourts.org>

Subject: (Counsel of Record in Underlying Action) RE: Status Inquiry - Appellate Case No. 2026-000919 - One Follow-Up Question

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Good afternoon Kristen,

Thank you for the call this afternoon and for explaining the policy regarding non-attorney filings and the visibility distinction on the public docket. Petitioners appreciate the clarification and the courtesy of your offer to follow up with the Clerk of Court tomorrow.

As I mentioned, I would be happy to certify that there is nothing inappropriate for public filing. In the interest of complete transparency and for your Clerk of Court's consideration, the Supplement does contain one address - that of Charles S. Altman, at 39 Wappoo Creek Place, Charleston, SC 29412 - which appears in connection with the January 12, 2026 early mortgage payoff documentation referenced in the filing. Petitioners surface this proactively because the Altman address is already a matter of public record through the Charleston County Register of Deeds (Book 0644, Page 555, recorded June 12, 2017, and the Day Book record of 1/12/2026), the same primary-source documents Petitioners attached as exhibits.

Petitioners are happy to address this specifically in any certification or affidavit the Clerk's office may request, including by attesting that no other personal addresses, and no dates of birth, Social Security

numbers, financial account numbers, or other categories typically subject to redaction under Rule 41.1, SCRPC, appear in the Supplement or its exhibits.

Petitioners offer this certification to provide the Clerk's office with a reasonable assurance mechanism that reduces clerk-side line-by-line review while preserving the policy's underlying protective purpose. Petitioners understand that the policy exists for the benefit of self-represented filers who may not realize what should be redacted, and Petitioners are happy to bear the burden of certification so that the Clerk's office does not have to bear the burden of verification.

As you requested, below is the list of parties and counsel of record in the underlying action, *McNeil & Poyer v. SAC 181, LLC et al.*, Case No. 2025-CP-10-05095, Charleston County Court of Common Pleas. All Defendants are represented by counsel; Plaintiffs proceed Pro Se.

Case Caption: *James C. ("Chris") McNeil and Meaghan Poyer v. SAC 181, LLC; Meridian Residential Group, LLC; Adam W. Bayles, individually; Tara Bayles, individually; and MRG Investing Company LLC* **Case No.:** 2025-CP-10-05095 (Charleston County Court of Common Pleas, Ninth Judicial Circuit)

Plaintiffs (Pro Se):

- James C. ("Chris") McNeil — chris@thaut.io
- Meaghan Poyer — mcneilandpoyer@gmail.com
- P.O. Box 30386, Charleston, SC 29417
- Phone: 843-818-3495 [ppl-ai-file-upload.s3.amazonaws](https://s3.amazonaws.com/ppl-ai-file-upload)

Defendants and Counsel of Record:

SAC 181, LLC — represented by **Kevin O'Brien, Esq.** (SC Bar No. 100968), Phelps Dunbar LLP

- Address: 4300 Edwards Mill Rd., Suite 600, Raleigh, NC 27612
- Phone: (919) 789-5300
- Email: kevin.o'brien@phelps.com
- Firm site: <https://www.phelps.com/offices/raleigh.html>

Meridian Residential Group, LLC; Adam W. Bayles (individually); and Tara Bayles (individually) — represented by **Alicia Bolyard, Esq.** (SC Bar No. 103737), and Christopher Manning, Esq. (SC Bar No. **104848**), Resnick & Louis, P.C.

- Address: 146 Fairchild St., Suite 130, Daniel Island, SC 29492
- Phone: (843) 212-0435
- Emails: abolyard@rlattorneys.com , cmanning@rlattorneys.com
- Firm site: <https://rlattorneys.com/locations/charleston/>

MRG Investing Company LLC — represented by **Jeffrey R. Kuykendall, Esq.**, independent practitioner

- Address: 321 Wingo Way. Ste. 201. Mount Pleasant, SC 29464

- Phone: 843-790-5182
- Email: jeff@jwklegal.com

Please let Petitioners know if any further information would assist your review or the Clerk of Court's. Petitioners are happy to provide additional documentation as needed.

Thank you again for your continued courtesy and professionalism.

Sincerely,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

— — — — —
Chris McNeil
Founder, Thaut
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<http://thaut.io>
Host of Podcast: *[Thought Leadership Studio](#)*

Forthcoming: *[Strategic Thought Leadership: The Book](#)*

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<https://www.linkedin.com/in/chris-mcneil-chs/>

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# **EXHIBIT B11**

**Folder Screenshot of SC Supreme Court docket pdf prints  
(showing dates created and filenames)**

## Folder Screenshot of SC Supreme Court docket pdf prints

| Name                                                                | Status | Date modified     | Type                  | Size     |
|---------------------------------------------------------------------|--------|-------------------|-----------------------|----------|
| 2026-00915-Hicks-Example                                            | ✓      | 5/11/2026 8:09 PM | File folder           |          |
| 2026-05-11-SCSC-Docket.pdf                                          | ✓      | 5/11/2026 8:02 PM | Adobe Acrobat Docu... | 1,337 KB |
| 2026-05-11-SCSC-Docket-OCR.pdf                                      | ✓      | 5/24/2026 9:26 PM | Adobe Acrobat Docu... | 83 KB    |
| 2026-05-11-SCSC-Hicks-Example-2026-00915.pdf                        | ✓      | 5/11/2026 8:08 PM | Adobe Acrobat Docu... | 980 KB   |
| 2026-05-11-SCSC-Hicks-Example-2026-00915-OCR.pdf                    | ✓      | 5/24/2026 9:28 PM | Adobe Acrobat Docu... | 31 KB    |
| 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf              | ✓      | 5/15/2026 3:37 PM | Adobe Acrobat Docu... | 452 KB   |
| 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf          | ✓      | 5/24/2026 9:30 PM | Adobe Acrobat Docu... | 30 KB    |
| 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf     | ✓      | 5/15/2026 3:38 PM | Adobe Acrobat Docu... | 606 KB   |
| 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf | ✓      | 5/24/2026 9:32 PM | Adobe Acrobat Docu... | 456 KB   |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf              | ✓      | 5/19/2026 3:39 PM | Adobe Acrobat Docu... | 417 KB   |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf          | ✓      | 5/24/2026 9:33 PM | Adobe Acrobat Docu... | 32 KB    |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-V2.pdf           | ✓      | 5/19/2026 3:45 PM | Adobe Acrobat Docu... | 417 KB   |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf     | ✓      | 5/19/2026 3:40 PM | Adobe Acrobat Docu... | 708 KB   |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf | ✓      | 5/24/2026 9:36 PM | Adobe Acrobat Docu... | 40 KB    |
| 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-V2.pdf  | ✓      | 5/19/2026 3:46 PM | Adobe Acrobat Docu... | 708 KB   |
| Screenshot 2026-05-19 154749-no-Hicks.jpg                           | ✓      | 5/19/2026 3:48 PM | JPG File              | 206 KB   |

## Hicks example folder shows files attached to 2026-00915 before it was pulled from public view

> ... SC Supreme Court > Docket > 2026-00915-Hicks-Example

Search 2026-00915-Hicks-Example

Q

Sort 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# EXHIBIT B12

## Pdf prints of 2 targeted docket searches on SC Supreme Court

SC Supreme Court Docket Check pdf prints

<https://ctrack.sccourts.org/public/caseSearch.do>

Printed pdf of Parameters

Court: "Supreme Court",  
Group: "Original Writ"  
Type: "Extraordinary Writ"  
Filed Date From: 5/1/2024  
Filed Date To 5/15/2026

2 prints of search results:

- (1) **Exclude Closed cases unchecked** (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf and 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf ),
- (2) **Exclude Closed cases checked** (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf, 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf)

Cases

Case Search

Participant Search

**Disclaimer:** The Information and documents available here should not be relied upon as an official record of action.  
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.  
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

Case Search

Court: Supreme Court

Group: Orig. Jur. and Writs

Type: Extraordinary Writ

Case Title:

Appellate Case No.:

Exclude Closed Cases:

Filed Date From: 05/01/2024

Filed Date To: 05/15/2026

Search

1 to 5 of 5 rows are displayed.

| Search Results |                        |                                                                             |                      |                    |               |                |                  |
|----------------|------------------------|-----------------------------------------------------------------------------|----------------------|--------------------|---------------|----------------|------------------|
| ▲ Court ▼      | ▲ Appellate Case No. ▼ | Short Title                                                                 | ▲ Group ▼            | ▲ Type ▼           | ▲ Subtype ▼   | ▲ Filed Date ▼ | ▲ Status ▼       |
| Supreme Court  | 2026-000915            | Rodney Ajaira Hicks v. South Carolina Department of Social Services, et al. | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 04/14/2026     | Pending          |
| Supreme Court  | 2025-002120            | John A. Tibbs, et al. v. 3M Company, et al. (Altrad)                        | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court  | 2025-002121            | John A. Tibbs, et al. v. 3M Company, et al. (Charter)                       | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court  | 2024-001499            | John A. Tibbs v. Asbestos Corporation Limited (2)                           | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/11/2024     | Held in Abeyance |
| Supreme Court  | 2024-001423            | John A. Tibbs v. Asbestos Corporation Limited (5)                           | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/30/2024     | Held in Abeyance |

1 to 5 of 5 rows are displayed.

## Cases

## Case Search

## Participant Search

**Disclaimer:** The information and documents available here should not be relied upon as an official record of action.  
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.  
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

## Case Search

**Court:** Supreme Court ▼**Group:** Orig. Jur. and Writs ▼**Type:** Extraordinary Writ ▼**Case Title:****Appellate Case No.:****Exclude Closed Cases:** ☐**Filed Date From:** 05/01/2024**Filed Date To:** 05/15/2026

Search

1 to 16 of 16 rows are displayed.

## Search Results

| ▲ Court ▼     | ▲ Appellate Case No. ▼ | Short Title                                                                                      | ▲ Group ▼            | ▲ Type ▼           | ▲ Subtype ▼   | ▲ Filed Date ▼ | ▲ Status ▼       |
|---------------|------------------------|--------------------------------------------------------------------------------------------------|----------------------|--------------------|---------------|----------------|------------------|
| Supreme Court | 2026-000915            | Rodney Ajaira Hicks v. South Carolina Department of Social Services, et al.                      | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 04/14/2026     | Pending          |
| Supreme Court | 2026-000383            | Christopher E. Mills; Spero Law LLC v. Acting Circuit Judge Jean H. Toal, etc.                   | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 02/20/2026     | Ended            |
| Supreme Court | 2026-000096            | Robert Vance, et al. v. Greenville Community Healthcare, et al.                                  | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 01/15/2026     | Ended            |
| Supreme Court | 2025-002187            | Stephen Corey Bryant v. Joel Anderson, Acting Director                                           | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 10/29/2025     | Ended            |
| Supreme Court | 2025-002174            | Citizens Alliance for Government Integrity v. York County, et al.                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/28/2025     | Ended            |
| Supreme Court | 2025-002133            | Andrew T. Gerken, et al. v. Avon Products, Inc., et al.                                          | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/21/2025     | Ended            |
| Supreme Court | 2025-002120            | John A. Tibbs, et al. v. 3M Company, et al. (Altrad)                                             | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held In Abeyance |
| Supreme Court | 2025-002121            | John A. Tibbs, et al. v. 3M Company, et al. (Charter)                                            | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held In Abeyance |
| Supreme Court | 2025-001898            | Friends of Coastal South Carolina v. South Carolina Department of Environmental Services, et al. | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/17/2025     | Ended            |
| Supreme Court | 2025-001670            | State of South Carolina v. Michael Wilson Pearson                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/21/2025     | Ended            |
| Supreme Court | 2025-001111            | David Climer, et al. v. Curtis M. Loftis, Jr., et al.                                            | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 06/06/2025     | Ended            |
| Supreme Court | 2025-000524            | Mikal D. Mahdi v. Bryan P. Stirling, Director, etc.                                              | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 03/18/2025     | Ended            |
| Supreme Court | 2025-000309            | Brad Keith Sigmon v. Bryan P. Stirling, Director, et al.                                         | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 02/20/2025     | Ended            |
| Supreme Court | 2024-002113            | Marion Bowman, Jr. v. State of South Carolina                                                    | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 12/16/2024     | Ended            |
| Supreme Court | 2024-001499            | John A. Tibbs v. Asbestos Corporation Limited (2)                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/11/2024     | Held in Abeyance |
| Supreme Court | 2024-001423            | John A. Tibbs v. Asbestos Corporation Limited (5)                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/30/2024     | Held In Abeyance |

1 to 16 of 16 rows are displayed.

# EXHIBIT B13

## Pdf prints of 2 targeted docket searches on SC Supreme Court and screenshot of search for 2026-00915

SC Supreme Court Docket Check pdf prints

<https://ctrack.sccourts.org/public/caseSearch.do>

Printed pdf of Parameters

Court: "Supreme Court",  
Group: "Original Writ"  
Type: "Extraordinary Writ"  
Filed Date From: 5/1/2024  
Filed Date To 5/15/2026

2 prints of search results:

(1) **Exclude Closed cases unchecked** (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf and 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf ),

(2) **Exclude Closed cases checked** (2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf, 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf)

Cases

Case Search

Participant Search

**Disclaimer:** The Information and documents available here should not be relied upon as an official record of action.  
Only filed documents can be viewed. Some documents received in a case may not be available for viewing.  
Some documents originating from a lower court, including records and appendices, may not be available for viewing.

Case Search

Court: Supreme Court

Group: Orig. Jur. and Writs

Type: Extraordinary Writ

Case Title:

Appellate Case No.:

Exclude Closed Cases:

Filed Date From: 05/01/2024

Filed Date To: 05/15/2026

Search

1 to 4 of 4 rows are displayed.

| Search Results |                        |                                                       |                      |                    |               |                |                  |
|----------------|------------------------|-------------------------------------------------------|----------------------|--------------------|---------------|----------------|------------------|
| ▲ Court ▼      | ▲ Appellate Case No. ▼ | Short Title                                           | ▲ Group ▼            | ▲ Type ▼           | ▲ Subtype ▼   | ▲ Filed Date ▼ | ▲ Status ▼       |
| Supreme Court  | 2025-002120            | John A. Tibbs, et al. v. 3M Company, et al. (Altrad)  | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court  | 2025-002121            | John A. Tibbs, et al. v. 3M Company, et al. (Charter) | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court  | 2024-001499            | John A. Tibbs v. Asbestos Corporation Limited (2)     | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/11/2024     | Held in Abeyance |
| Supreme Court  | 2024-001423            | John A. Tibbs v. Asbestos Corporation Limited (5)     | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/30/2024     | Held in Abeyance |

1 to 4 of 4 rows are displayed.

## Cases

## Case Search

## Participant Search

**Disclaimer:** The information and documents available here should not be relied upon as an official record of action. Only filed documents can be viewed. Some documents received in a case may not be available for viewing. Some documents originating from a lower court, including records and appendices, may not be available for viewing.

## Case Search

Court: Supreme Court ▼

Group: Orig. Jur. and Writs ▼

Type: Extraordinary Writ ▼

Case Title:

Appellate Case No.:

Exclude Closed Cases: ☐

Filed Date From:

05/01/2024

Filed Date To:

05/15/2026

Search

1 to 15 of 15 rows are displayed.

## Search Results

| ▲ Court ▼     | ▲ Appellate Case No. ▼ | Short Title                                                                                      | ▲ Group ▼            | ▲ Type ▼           | ▲ Subtype ▼   | ▲ Filed Date ▼ | ▲ Status ▼       |
|---------------|------------------------|--------------------------------------------------------------------------------------------------|----------------------|--------------------|---------------|----------------|------------------|
| Supreme Court | 2026-000383            | Christopher E. Mills; Spero Law LLC v. Acting Circuit Judge Jean H. Toal, etc.                   | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 02/20/2026     | Ended            |
| Supreme Court | 2026-000096            | Robert Vance, et al. v. Greenville Community Healthcare, et al.                                  | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 01/15/2026     | Ended            |
| Supreme Court | 2025-002187            | Stephen Corey Bryant v. Joel Anderson, Acting Director                                           | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 10/29/2025     | Ended            |
| Supreme Court | 2025-002174            | Citizens Alliance for Government Integrity v. York County, et al.                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/28/2025     | Ended            |
| Supreme Court | 2025-002133            | Andrew T. Gerken, et al. v. Avon Products, Inc., et al.                                          | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/21/2025     | Ended            |
| Supreme Court | 2025-002120            | John A. Tibbs, et al. v. 3M Company, et al. (Altrad)                                             | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court | 2025-002121            | John A. Tibbs, et al. v. 3M Company, et al. (Charter)                                            | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/20/2025     | Held in Abeyance |
| Supreme Court | 2025-001898            | Friends of Coastal South Carolina v. South Carolina Department of Environmental Services, et al. | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/17/2025     | Ended            |
| Supreme Court | 2025-001670            | State of South Carolina v. Michael Wilson Pearson                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/21/2025     | Ended            |
| Supreme Court | 2025-001111            | David Climer, et al. v. Curtis M. Loftis, Jr., et al.                                            | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 06/06/2025     | Ended            |
| Supreme Court | 2025-000524            | Mikal D. Mahdi v. Bryan P. Stirling, Director, etc.                                              | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 03/18/2025     | Ended            |
| Supreme Court | 2025-000309            | Brad Keith Sigmon v. Bryan P. Stirling, Director, et al.                                         | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 02/20/2025     | Ended            |
| Supreme Court | 2024-002113            | Marlon Bowman, Jr. v. State of South Carolina                                                    | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 12/16/2024     | Ended            |
| Supreme Court | 2024-001499            | John A. Tibbs v. Asbestos Corporation Limited (2)                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 09/11/2024     | Held in Abeyance |
| Supreme Court | 2024-001423            | John A. Tibbs v. Asbestos Corporation Limited (5)                                                | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/30/2024     | Held in Abeyance |

1 to 15 of 15 rows are displayed.



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Appellate Case No.:

2026-000915

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05/01/2024

Filed Date To:

05/19/2026

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# **EXHIBIT B14**

**Email of May 21, 2026 from Kristen from SC Supreme Court and  
attached order 2026-000919 - McNeil.pdf and McNeil Filing  
05.12.26.pdf (stamped cover only for exhibits)**

2026-000919 - McNeil v. Ninth Judicial Circuit Court - Message (HTML)

FileMessageHelp

Tell me what you want to do

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Zoom

Zoom

Reply with Scheduling Poll

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2026-000919 - McNeil v. Ninth Judicial Circuit Court

SC

Supreme Court Filings <supctfilings@sccourts.org>

To

chris.thaut.io; holly.beeson@llr.sc.gov; McCoy, Jennifer B.; mcneilandpoyer@gmail.com; Rode, Thomas J.; Van Slambrook, Dale E.; eknisley@charlestoncounty.org; ALHethington@charlestoncounty.org; abolyard@rlattorneys.com; cmanning@rlattorneys.com

Thu 5/21/2026 11:50 AM

2026-000919 - McNeil.pdf

594 KB

McNeil Filing 05.12.26.pdf

3 MB

Start your reply all with:

Order received, thank you.

Received, thank you.

Thank you!

Feedback

Open PDFs in Adobe Acrobat

Please see the attached order in the above referenced case.

Thank you,

Kristen

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The Supreme Court of South Carolina

James C. "Chris" McNeil and Meghan Poyer, Petitioners,

v.

Ninth Judicial Circuit Court of Common Pleas,
Charleston County, Respondent.

Appellate Case No. 2026-000919

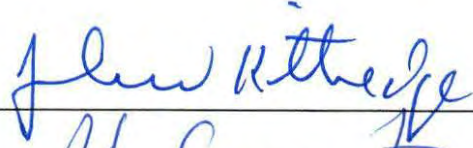
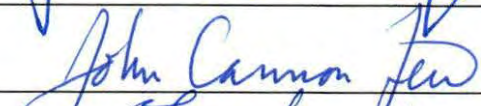
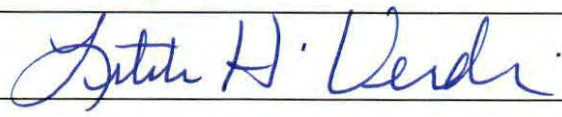
ORDER

Petitioners have filed a *pro se* petition for a writ of mandamus asking this Court to direct the circuit court in Charleston to rule on (1) their motion to file a second amended complaint filed on October 24, 2025; (2) their motion for ADA accommodations filed on January 30, 2026; and (3) their "Omnibus" motion filed on February 24, 2026. Because the circuit court has scheduled a hearing on Petitioners' motions for May 28, 2026, we decline to entertain this matter in this Court's original jurisdiction. *See* Rule 245, SCACR, and *Key v. Currie*, 305 S.C. 115, 406 S.E.2d 356 (1991).

However, we also take this opportunity to caution Petitioners that the circuit court requires time to review and consider individual motions and any accompanying materials prior to issuing a dispositive ruling. Furthermore, Charleston is a very large county, and Petitioners' case is one of many pending before that court. The very fact that the circuit court has scheduled a hearing on Petitioners' motions demonstrates that the circuit court is not ignoring Petitioners' filings. Accordingly, seeking a writ of mandamus before this Court was unnecessary.

While we understand any litigants' concerns about the process, Petitioners are further cautioned that their excessive filings likely contributed to any delays in the case. Our review of the underlying case in the Charleston County public index indicates that Petitioners have filed more than forty motions, notices, and other documents during the eight-month time frame that the case has been pending.

While Petitioners' filings in the underlying case may not yet rise to the level of abusive, Petitioners are warned that this Court and the circuit court have the power to establish filing restrictions in the event that either court determines a litigant is a prolific or abusive filer.¹

| | |
|--|------|
|  | C.J. |
|  | J. |
|  | J. |
|  | J. |
|  | J. |

Columbia, South Carolina
May 21, 2026

cc:

Holly Palmer Beeson
Edward L. Knisley, Jr.
Andrew LaRoche Hethington
Alicia Noel Bolyard
Christopher William Manning
James C. McNeil
Meaghan Poyer

¹ In addition to the powers specifically granted to the Court in section article V, § 5 of the Constitution, the Supreme Court has the "inherent power to control the order of its business to safeguard the rights of litigants." *Renaissance Enterprises, Inc. v. Summit Teleservices, Inc.*, 334 S.C. 649, 651, 515 S.E.2d 257, 258 (1999). This power includes not only the regulation of the practice of law, but the power to punish by contempt and, when necessary to protect the orderly administration of justice and the rights of other litigants, to establish filing restrictions in the case of prolific, abusive filers.

Thomas J. Rode
Jennifer Blanchard McCoy
The Honorable Dale E. Van Slambrook

RECEIVED

May 12 2026

SC, SUPREME COURT

From: chris@thaut.io
To: [Supreme Court Filings](#)
Cc: [C&M McNeil](#)
Subject: Filing: Petitioners' Supplement Following April 28, 2026 Return-Request Letter | Appellate Case No. 2026-000919
Date: Monday, May 11, 2026 1:55:29 PM
Attachments: [2026-05-11-Supplement-Following-April-28-Return-Request-2026-000919.pdf](#)

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

To the Clerk of Court:

Please accept for filing the attached:

- **Petitioners' Supplement Following April 28, 2026 Return-Request Letter in Appellate Case No. 2026-000919, McNeil v. Ninth Judicial Circuit Court.**

Petitioners attach the filed supplement and its exhibit materials, including:

- as **Exhibit A** the full Notice filed today in Charleston County Court of Common Pleas in underlying Case No. 2025-CP-10-05095.

Petitioners respectfully request that a file-stamped copy of the supplement be returned via email to **chris@thaut.io** and **mcneilandpoyer@gmail.com**, and that any correspondence or orders continue to be directed to those addresses, consistent with Petitioners' earlier filing email of April 14, 2026.

Respectfully,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

— — — — —

[Chris McNeil](#)
[Founder, Thaut](#)
[Systems Thinking-Based Business and Litigation Consulting](#)

Strategic Thought Leadership

Mobile 843.818.3495

<http://thaut.io>

Host of Podcast: *[Thought Leadership Studio](#)*

Forthcoming: *[Strategic Thought Leadership: The Book](#)*

LinkedIn

<https://www.linkedin.com/in/chris-mcneil-chs/>

RECEIVED

May 12 2026

SOUTH CAROLINA SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

James C. "Chris" McNeil and
Meaghan Poyer,Petitioners,

v.

Ninth Judicial Circuit Court of Common Pleas, Charleston County,
..... Respondent.

PETITIONERS' STATUS REPORT SUPPLEMENT FOLLOWING APRIL 28, 2026
RETURN-REQUEST LETTER

I. INTRODUCTION & THE CONTINUED FAILURE TO PERFORM

MANDATORY DUTIES

Petitioners respectfully submit this Supplement, without seeking to expand claims for relief, to update the Court on post-return developments bearing directly on the ministerial failures that prompted this Court's April 28, 2026 return-request letter to the Charleston County Clerk of Court. **Over ten days have now passed since that letter issued.** During those time, the Ninth

Judicial Circuit has issued **no ruling** on the Supplemental Motion for ADA Accommodations, which has now been pending for **101 days** since its January 30, 2026 filing.

The unruled-motion inventory has, if anything, worsened in the intervening period:

- **Motion to Compel Insurance Disclosure:** pending **223 days** (filed September 30, 2025);
- **Motion for Leave to File Second Amended Complaint:** pending **199 days** (filed October 24, 2025);
- **Supplemental Motion for ADA Accommodations:** pending **101 days**;
- **December 23, 2025 Motion to Determine Sufficiency of RFA Answers:** pending **139 days**;
- **April 29, 2026 written Recusal Request directed to Judge Jennifer B. McCoy:** **12 days unanswered.**

The continued silence on the ADA Motion operates as an **ongoing denial of equal access to the court's ministerial processes**. Petitioner McNeil's documented PCL-5 PTSD score of 76/80 establishes both disability and a concrete clinical risk profile, and the January 30, 2026 motion requests the hearing-access accommodations necessary for safe participation. Each additional day without a ruling extends the burden on a disabled pro se litigant to navigate the same procedural environment that produced the injury, without the accommodations Title II requires.

II. THE FOURTEENTH AMENDMENT SIGNIFICANCE OF THE CURRENT STATUS RECORD

The post-return status record now before this Court presents an ongoing Fourteenth Amendment access problem in three concrete forms already reflected in the docket and court-administration record.

- First, Petitioners' January 30, 2026 Supplemental Motion for ADA Accommodations remains unruled 101 days after filing, even though the motion presents documented disability, requested hearing-access accommodations, and a clinical risk profile tied to litigation conditions.
- Second, represented defense counsel received prompt procedural access, including remote-appearance accommodation and proposed-order handling, while Petitioners continued to bear the unequal burdens of paper filing, access friction, and unanswered safety-related requests.
- Third, over ten days after this Court's April 28, 2026 return-request letter seeking the current status of Petitioners' pending motions, the same pattern of silence and nonperformance remains in place.

Taken together, those facts present the current form of Petitioners' Fourteenth Amendment claim: unequal access to the court's ministerial processes and continuing deprivation through non-ruling under active supervisory attention.

The bias is documentable as a pattern of differential treatment in three independent dimensions:

A. Differential treatment of proposed orders. On October 7, 2025, Judge McCoy's chambers returned Petitioners' proposed orders with the directive *"Do not need orders unless judge requests one,"* a posture that contrasts directly with the five-day turnaround afforded to defense

counsel's April 2, 2026 proposed order on the Tate withdrawal motion, filed 3 weeks after her unannounced departure from Phelps Dunbar and the case. Identical procedural acts, taken by represented and unrepresented parties, received opposite institutional responses.

B. Active gatekeeping of safety filings by court staff. On March 23, 2026, Administrative Assistant Beth Atkins (Judge Van Slambrook's chambers) characterized Petitioners' all-parties courtesy email regarding the April 3, 2026 hearing as "*ex parte and not allowed*" at 1:37 PM. **Sixty-two minutes later**, the same court-staff email thread accommodated defense counsel Alicia Bolyard's near-identically structured request for Webex access — without any *ex parte* concern raised. The same Webex access Petitioners had requested as part of the still-unruled January 30, 2026 ADA Motion was extended to defense counsel on demand and denied to disabled *pro se* Petitioners through 101+ days of silence.

C. Continued post-return silence on a request requiring judicial response. On April 29, 2026, after this Court's return-request letter had issued and while supervisory attention was active, Petitioners sent Judge McCoy a written request that she recuse from any further role in this matter and requested a response by noon Friday, May 1, 2026. As of the date of this Supplement, no response has issued. That unanswered request belongs in this status report because it is another current example of the same motion-blackout environment identified in the original Petition remaining active after this Court's April 28 intervention. Its significance here is institutional and evidentiary: the local process continues to generate silence rather than decision on matters requiring judicial attention.

These data points are the operating signature of a structural access condition in which institutional response turns on party identity rather than the merits of the matter presented. In this

case, that condition remained active after the Supreme Court's April 28, 2026 return-request letter, as reflected by the continued silence on the ADA Motion and the unanswered April 29, 2026 recusal request. The significance of that continued silence is case-specific and practical: returning this matter to the ordinary rotating Ninth Circuit process would recreate the same conditions now under supervisory review, while continuity of assignment under Judge Wheeler provides the stable adjudicative structure through which equal access can actually be restored in this case.

III. PETITIONERS' NOTICE OF PRE-HEARING CORRECTIVE ACTIONS (THE OFF-RAMP)

Petitioners respectfully advise this Court that, concurrent with this Supplement, Petitioner are filing in the Ninth Judicial Circuit a **Notice of Pre-Hearing Safety and Case-Management Matters, Request for Temporary Restraining Order and Court-Ordered Forensic Audit, and Proposed Roster Reorganization for the May 28, 2026 Hearing** before the Honorable Will Wheeler. That Notice is attached to this Supplement as **Exhibit 1**.

The Notice is calibrated to give the Ninth Judicial Circuit a specific, actionable off-ramp from the structural-bias pattern documented above. It requests, on the papers and before May 28:

- a) immediate grant of the 101-day-pending ADA accommodations;
- b) grant of leave to file the Second Amended Complaint with a shortened answer period;
- c) pre-hearing review of the December 23, 2025 RFA Sufficiency Motion with deemed admissions where appropriate;

- d) entry of a Temporary Restraining Order and forensic audit order to preserve judgment collectibility against documented asset-flight conduct; and
- e) administrative confirmation that Judge Wheeler is the sole presiding judicial officer for the May 28 hearing and any pre-hearing matters flowing from the Notice.

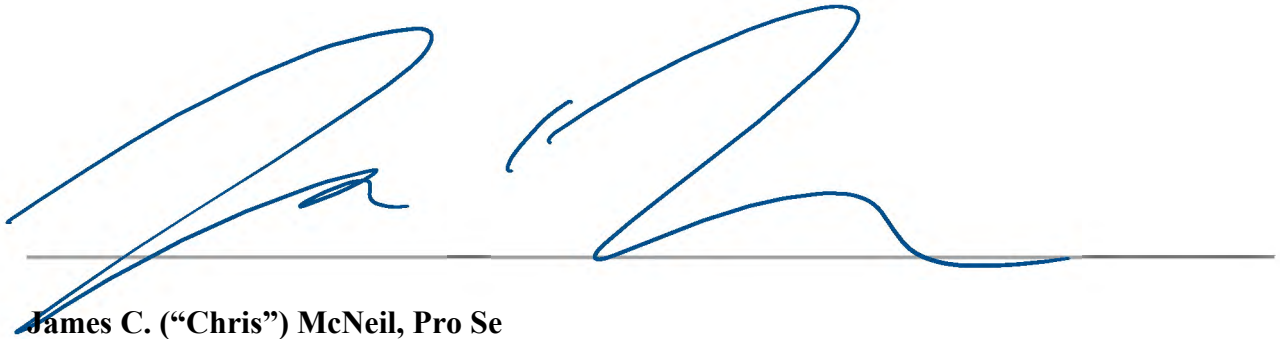
To prevent further constitutional injury and to ensure a fair trial before a Charleston County jury, Petitioners have formally notified the Ninth Judicial Circuit that safety and equal access require consolidating this matter under Judge Wheeler for the duration of the proceedings, away from the structural hostility documented above. That consolidation is the local-court remedy that, if entered, restores Fourteenth Amendment compliance without further supervisory action by this Court.

IV. CONCLUSION

Petitioners submit this Supplement to keep this Court's record continuous through the ten-day period following the April 28, 2026 return-request letter and through the approach of the May 28, 2026 hearing. The ongoing constitutional injury reflected in that status record is concrete: the 101-day-unruled ADA Motion, the continuing unequal access burdens imposed on disabled pro se Petitioners, and the continued silence on pending matters after this Court requested a return addressing their status. Exhibit 1 presents a specific local-court corrective path that can restore equal access and orderly adjudication within the case now before the Ninth Judicial Circuit.

Exhibit 1: Plaintiffs' Notice of Pre-Hearing Safety and Case-Management Matters, Request for Temporary Restraining Order and Court-Ordered Forensic Audit, and Proposed Roster Reorganization for the May 28, 2026 Hearing (filed concurrently in 2025-CP-10-05095).

Respectfully submitted this 11th day of May, 2026.

A handwritten signature in blue ink, appearing to read 'Chris McNeil', is written above a horizontal line.

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

A handwritten signature in blue ink, reading 'Meaghan Poyer', is written above a horizontal line.

Meaghan Poyer, Pro Se
P.O. Box 30386, Charleston, SC 29417
mcneilandpoyer@gmail.com

RECEIVED

May 12 2026

S.C. SUPREME COURT

EXHIBIT A

**Notice of Pre-Hearing Safety and Case-Management
Matters, Request for Temporary Restraining Order and
Court-Ordered Forensic Audit, with all Exhibits**

EXHIBIT C

**South Carolina's Constitutional Crisis
in Access to Justice for Self-Represented Parties**

Overview

The procedural conditions in this matter document a measurable, state-level access-to-justice failure.

The National Center for Access to Justice (NCAJ) ranks South Carolina near the bottom of the nation on every Justice Index measure that bears directly on the experience of a disabled, self-represented litigant. South Carolina at a Glance

- **Overall Justice Index score:** 23.7 / 100.
- **Self-Representation Index score:** 18.1 / 100, ranked 47th of 52 jurisdictions (46 jurisdictions scored higher; 5 scored lower).
- **Comparative position:** Bottom decile nationally on both measures.

Self-Representation Index — Top 10 Jurisdictions

| Rank | Jurisdiction | Score (of 100) |
|------|----------------------|----------------|
| 1 | California | 91.2 |
| 2 | Massachusetts | 90.2 |
| 3 | Illinois | 88.4 |
| 4 | District of Columbia | 82.8 |
| 5 | Maryland | 80.5 |
| 6 | Hawaii | 79.5 |
| 7 | Connecticut | 73.5 |
| 8 | Minnesota | 68.8 |
| 9 | New York | 65.6 |
| 10 | New Jersey | 61.4 |

Self-Representation Index — Bottom 10 Jurisdictions

| Rank | Jurisdiction | Score (of 100) |
|------|----------------|----------------|
| 43 | Missouri | 20.9 |
| 44 | Arkansas | 20.0 |
| 45 | Idaho | 19.5 |
| 46 | Alabama | 18.6 |
| 47 | South Carolina | 18.1 |
| 48 | Texas | 17.7 |
| 49 | Maine | 14.9 |
| 50 | New Hampshire | 9.8 |
| 51 | South Dakota | 7.9 |
| 52 | Rhode Island | 5.1 |

Source: NCAJ Self-Representation Index 2020.

The Non-Zero-Sum Reality: Access Design and Lawyer Compensation

A common assumption holds that stronger access for self-represented and vulnerable litigants must come at the expense of the legal profession. The data point in the opposite direction. Pairing the NCAJ Top 10 and Bottom 10 access-to-justice states with the U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics (May 2023 estimates, Occupation Code 23-1011: Lawyers) favors the access-strong states.

Top 10 Access-to-Justice States — Mean Annual Attorney Salary

| Jurisdiction | Mean Annual Attorney Salary |
|----------------------|-----------------------------|
| District of Columbia | \$238,990 |
| California | \$213,860 |
| New York | \$208,480 |
| Connecticut | \$195,730 |
| Massachusetts | \$188,920 |
| Colorado | \$156,890 |
| Illinois | \$145,260 |
| Minnesota | \$142,330 |
| Maryland | \$137,890 |
| Hawaii | \$118,230 |
| Top 10 Average | \$174,658 |

Sources: NCAJ Justice Index; BLS OEWS May 2023, Occupation Code 23-1011.

Bottom 10 Access-to-Justice States — Mean Annual Attorney Salary

| Jurisdiction | Mean Annual Attorney Salary |
|-------------------|-----------------------------|
| Nevada | \$142,750 |
| New Hampshire | \$119,650 |
| Indiana | \$118,790 |
| Alabama | \$117,450 |
| South Carolina | \$111,890 |
| Oklahoma | \$110,650 |
| North Dakota | \$104,560 |
| South Dakota | \$102,340 |
| Wyoming | \$101,890 |
| West Virginia | \$96,150 |
| Bottom 10 Average | \$112,612 |

Sources: NCAJ Justice Index; BLS OEWS May 2023, Occupation Code 23-1011.

For the salary comparison below, Plaintiffs use the NCAJ jurisdictions identified in the attached Top-10/Bottom-10 access-to-justice wage analysis derived from the Justice Index framework, which is presented here as a comparative policy-market snapshot rather than as a verbatim restatement of the separate Self-Representation Top 10 table above. What the Comparison Shows

The average mean annual attorney salary in the Top 10 access-to-justice states is approximately **\$174,658**, compared with approximately **\$112,612** in the Bottom 10 states — a difference of roughly **\$62,000 per attorney per year**. States that invest in robust access-to-justice infrastructure — well-funded access commissions, plain-language court forms, functional self-help centers, and meaningful procedural support for disabled and unrepresented litigants — tend to host larger, higher-compensated legal markets, not smaller ones. Access-aligned design is non-zero-sum: it produces stronger outcomes for vulnerable litigants and stronger professional outcomes for lawyers simultaneously.

South Carolina's \$111,890 mean attorney salary, paired with its 18.1 / 100 Self-Representation Index score, places the State in the lowest-performing cluster on both axes.

The Constitutional Dimension

When a state's court architecture persistently under-serves self-represented and disabled litigants, the access problem matures from administrative inconvenience into a constitutional concern. South Carolina's bottom-decile performance on both the overall Justice Index and the Self-Representation Index supports the inference that the deficits are structural rather than isolated. The condition implicates Due Process, Equal Protection, and the practical availability of the courts, including obligations under Title II of the Americans with Disabilities Act (42 U.S.C. § 12131 et seq.; 28 C.F.R. § 35.130).

In systems-thinking terms, the deficits also generate failure demand: extra procedural work imposed on every participant in the system because foundational access functions were not designed to operate cleanly the first time. The lived experience documented in Plaintiff McNeil's Declaration- manual filing, poor scan quality, and manually documenting proof of service while electronically filed defense pleadings appear instantly and clearly; a 117-day non-ruling on a federally mandated ADA accommodation; a 215-day pendency on a Motion for Leave that sat unopposed for 179 days - is the predictable output of the captured-architecture design that the Justice Index data quantifies at the state level.

Most Vulnerable Member (MVM) Design as a Path Forward

The Justice Index data establishes that better-performing jurisdictions have already implemented the design choices required to align state-court architecture with constitutional access standards. Initial intervention points consistent with Most Vulnerable Member design include:

- Equivalent-quality electronic filing and service pathways for self-represented litigants.
- Enforceable timeliness standards for ADA accommodation processing in active civil cases.
- Procedural design review at every touchpoint that currently creates avoidable friction for disabled or unrepresented litigants.
- Statewide publication of access bottlenecks so that redesign can be measured rather than guessed.

These are design choices already in operation in stronger-performing jurisdictions. The path forward is available within existing institutional frameworks — and, as the wage data demonstrates, it benefits every participant in the system, including the attorneys, judges, and court staff whose daily work is made measurably harder by the present design.

EXHIBIT D

Ripeness for Federal Intervention

in

McNeil v SAC 181, LLC

2025-CP-10-05095

Federal Ripeness Posture and Off-Ramp for State-System Resolution

Overview

This exhibit documents that the cumulative procedural posture in this matter has matured into a fully ripe predicate for uncaptured federal-level intervention under 42 U.S.C. § 1983, Title II of the Americans with Disabilities Act (42 U.S.C. § 12131 et seq.; 28 C.F.R. § 35.130), and the structural-error doctrine. Plaintiffs document this posture in service of restoring the state-system pathway as a viable forum, and in recognition that good people are trapped by poorly-designed systems at every institutional level.

State-System Conditions Documented in the Record

The following procedural conditions are on the docket in this matter or its companion proceeding, the Petition for Writ of Mandamus before the South Carolina Supreme Court (Case No. 2026-000919):

- A Motion for Leave to File Second Amended Complaint filed October 24, 2025 and pending at filing of this exhibit, having been unopposed for the first 179 days.
- A federally mandated ADA accommodation request filed January 30, 2026 and pending without ruling for 117 days at filing of this exhibit.
- Documented obstruction conduct including third-party witness interference clustered around the LLR statutory investigation deadline.
- Documented anomalies in the South Carolina Supreme Court's handling of the related Petition for Writ of Mandamus, including docket-visibility irregularities summarized in the Plaintiffs' SCSC Docket Anomalies Summary.

These conditions, taken together and in their pattern, exhaust the ordinary state-system remedies in fact even where they remain technically available on paper.

Federal Ripeness Criteria Satisfied

The cumulative pattern satisfies the threshold criteria for federal-level intervention across multiple uncaptured federal pathways:

| State-Level Condition Documented | Corresponding Federal Predicate |
|---|---|
| 117-day non-ruling on a federally mandated ADA accommodation request | Title II of the ADA, 42 U.S.C. § 12131 et seq.; 28 C.F.R. § 35.130; structural-error doctrine. |
| 215-day pendency on a Rule 15(a) Motion for Leave with 179 days unopposed | Due Process Clause of the Fourteenth Amendment; 42 U.S.C. § 1983 deprivation-under-color-of-state-law analysis. |

| State-Level Condition Documented | Corresponding Federal Predicate |
|--|---|
| Coordinated witness tampering and obstruction of an active LLR investigation | 18 U.S.C. § 1512(b)(3) where the conduct targets information likely to be communicated to federal law-enforcement or civil-rights authorities; 42 U.S.C. § 1985(2) where the pattern is framed as conspiracy to impede the due course of justice with equal-protection implications; DOJ Civil Rights Division referral/coordination posture. |
| Documented network entwinement among private defendants, captured insurance carriers, and state actors | <i>Lugar v. Edmondson Oil Co.</i> , 457 U.S. 922 (1982), joint-action analysis; <i>Brentwood Academy v. Tennessee Secondary School Athletic Ass’n</i> , 531 U.S. 288 (2001), entwinement analysis. |
| State-supreme-court-level docket anomalies on the related Mandamus Petition | Federal abstention exceptions under <i>Younger v. Harris</i> , 401 U.S. 37 (1971), where state procedures are inadequate to vindicate federal rights. |
| State-level access-to-justice ranking of 47/52 for self-represented litigants and 23.7/100 overall | Equal Protection Clause; structural deprivation of meaningful court access for disabled and unrepresented litigants. |
| Delay, friction, or adverse treatment following assertion of ADA rights and participation in ADA-related proceedings | ADA retaliation and coercion protections under 28 C.F.R. § 35.134 and 42 U.S.C. § 12203, which prohibit discrimination, coercion, intimidation, threats, or interference against a person who opposes unlawful ADA conduct or participates in an ADA proceeding. |
| Knowledge by connected actors of a conspiracy to obstruct justice or deny equal protection, coupled with failure to prevent it despite capacity to do so | 42 U.S.C. § 1986, action for neglect to prevent a § 1985 wrong, if Plaintiffs plead and prove the underlying § 1985 conspiracy and the requisite knowledge and power to prevent it. |
| Patterned enterprise conduct using coordinated entities, obstruction-adjacent behavior, and injury to Plaintiffs’ property or business interests | Potential civil RICO pathway under 18 U.S.C. §§ 1962(c) and (d) if Plaintiffs can specifically plead an enterprise, a pattern of racketeering activity, qualifying predicate acts, and concrete injury to business or property; this lane strengthens as enterprise structure and predicate-act specificity |
| Prolonged ADA non-response and structural court-access barriers affecting a disabled litigant | DOJ Title II administrative enforcement / complaint track as a parallel federal remedy for systemic access failures in state-court operations. |

This obstruction pattern also bears on anticipated and actual communication of civil-rights and ADA-related misconduct to federal authorities, including potential DOJ Civil Rights Division review, which strengthens the federal nexus for witness-tampering and interference analysis where conduct is aimed at suppressing information likely to reach federal processes.

The Off-Ramp Available to This Court

The federal forum is positioned to address the systemic issues regardless of the disposition of the present motion. This Court's ruling determines only the position of this Court's individual record relative to the documented trajectory. Granting the relief requested in the Emergency Motion for Health Continuance - continuing the May 28, 2026 hearing on health grounds, ruling on the pending ADA accommodation, striking Defendants' untimely opposition, and ruling on the pending Motion for Leave – could restore the state-system pathway as a viable forum.

The relief operates as the structural correction available within this Court's authority. Granting it obviates the federal-level intervention that would otherwise be ripe.

Acknowledgment of Trapped Actors

Plaintiffs recognize that good people are trapped by poorly-designed systems at every institutional level. The federal-ripeness posture documented herein is a procedural reality created by the cumulative pattern of prior conduct in this matter and in the companion Mandamus proceeding.

Preferred Resolution

Plaintiffs prefer the state-system resolution that this Court is positioned to provide. The federal-ripeness posture documented in this exhibit is offered in service of that preference. Plaintiffs request that this Court restore the state-court pathway as the forum in which the substantive issues of this matter can be heard with procedural integrity, meaningful ADA accommodation, and the operative pleading properly before the Court.