

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.

On June 22, 2026, Plaintiffs James C. McNeil and Meaghan Poyer filed the *Motion for Voluntary Dismissal Without Prejudice pursuant to South Carolina Rule of Civil Procedure 41(a)(2)*.

McNeil approaches this litigation as a friend of the court who reveres the values of justice, fairness and equality necessary for public trust in the justice system. He is applying high-level skills in systems intervention and advanced communications technologies to support good faith insiders who share these values and the vulnerable parties who depend on a fair court.

The primary purpose of this notice is mitigation of cognitive dissonance as Plaintiffs prepare to file in the United States District Court for the District of South Carolina to address civil rights violations, Title II ADA infractions, and other systemic exploitation at the current venue.

I. DEFENSE AI ACCUSATIONS REVEAL THEIR IGNORANCE

a) The Accusation of AI-dependency in the Absence of Engagement on the Merits.

In response to Plaintiffs' clearly documented evidence of wrongdoing and causal insights resulting from deep systems analysis, rather than concede or meet on the merits, Defense has pretended the major harms of the case never happened while maintaining only a singular coherent counter-narrative: characterizing Plaintiffs' output as "AI."

This mischaracterization is a category error which demonstrates that defense does not understand the Strategy Thought Leadership (STL) methodology Plaintiff McNeil has been applying to this case. If they did, Defense would realize that not only is Strategic Thought Leadership not AI-sourced, **it cannot be derived from AI** because

1. **Strategic Thought Leadership demonstrably operates at a higher logical level than AI Large Language Model (LLM) AI like ChatGPT do, and**
2. **Strategic Thought Leadership for systems intervention depends on direct sensory experience that current AI cannot manage.**

Further sections will clarify and strengthen the case for these two points.

b) Purpose: Mitigate Against Cognitive Dissonance.

Plaintiffs share the capabilities of Strategic Thought Leadership and STL Schema to mitigate against cognitive dissonance on the part of defense, the jury, the public, press, and the court as Plaintiffs enter federal court standing up to multiple large organizations, principles, agents, and public institutions with confidence they will prevail on the merits in spite of what would otherwise appear to be a large disparity in resources.

Plaintiffs would agree that there is a disparity in resources, but would argue that it is in their favor, with Plaintiffs wielding Strategic Thought Leadership and STL Schema as

instruments of strategic systems intervention through paradigm change that grant Plaintiffs capabilities that Phelps Dunbar and Resnick & Louis attorneys have demonstrated they don't understand, which implies they have no counter-strategy. These technologies and frameworks turn defense's larger scale and number into disadvantages, similar to how 100 sumo wrestlers training for an endurance run against a solitary triathlete will be unlikely to prevail. The defendants size, scale, and numbers also work against them in this context by providing more surface area for Plaintiff-risk mitigating First Amendment protected transparency.

c) Size and Number of Defense = Greater Surface Area for Exposure

According to Donella Meadows' pivotal *Places to Intervene in a System*, the highest leverage point for systemic change is the paradigm the system is based on. STL Schema facilitates paradigm change in part by attaching the harm of the problematic mental model being addressed to the reputations of those implementing the model, so they serve as examples of the price of not making the change. This harm-to-reputation connection is trained into the AI Knowledge Graph to support steering users instead towards the *solution paradigms* that STL designs and STL Schema propagates through its proprietary methods of AI training media.

d) It is Already Working

A proof-of-concept of this dynamic was distributed to defense and private-actor incoming federal court defendants on June 22, 2026 in the State of the System II documents that included the screenshots of the first page of Google results for a search of "Tara Bayles PMIC" (without quotes) where 7 of the 10 results were from Plaintiffs' media regarding the case and the number one result is the STL Schema-fueled "evidence page" which places evidence such as the alleged falsified postmark and screenshots of private life images published without consent just one more

click away. A screenshot of a Google AI query of “Tara Bayles PMIC” that also referenced the case was included as well.

In spite of this clear demonstration of publicly available narrative collapse refuting the consistent “didn’t happen” mantra of defense that led to a nervous breakdown and concurrent “extreme” 76/80 PCL-5 PTSD score in Plaintiff McNeil in January 2026, the responses to Requests for Admission from both the ownership (SAC 181, LLC, owned by the Altman family) camp represented by Phelps Dunbar and the management (Meridian Residential Group, LLC, Adam Bayles, and Tara Bayles) camp represented by Resnick & Louis defaulted back to vague and obstructive boilerplate answers. These screenshots and RFA responses are documented in Exhibit D. [Exhibit D: Narrative Collapse and Corporate Spoliation.]

e) The Choice to De-Escalate Will be Offered and a Positive Response will also be Trained into the AI Knowledge Graph as a “Redemption Story”

It merits noting that these STL Schema AI training “broadcast stations” will also implement a choice for defendants, offering a redemption path that, if taken, will also be amplified, turning what could be construed as reputation damage into a redemption story. These off-ramps to remediation will still include full accountability for the harm that has been done, which is part of the personal growth benefits STL offers, even to Plaintiffs’ adversaries. This is consistent with the paradigm shift purpose as it also serves the positive change when wrongdoers make the connection between their mental models and the problems they create, and change them for the better. In this sense, the amount of work Plaintiff McNeil has done in creating multiple Thought Leadership Models that package the discovered systemic truths of paradigm shifts like Conscious Co-Stewardship is offered as a service for the greater good that not only improve access to

justice and stable housing for the vulnerable, but can also help any defendant mitigate their own exposure by documenting their realization that a better choice is available than taking it.

The subsequent points will further unpack how these dynamics work, as both the aforementioned cognitive dissonance mitigation and also as an exercise in transparency in service of the principle of fairness.

f) How Strategic Thought Leadership (STL) Cannot Be AI-Sourced by Definition.

This accusation fails factually and fails by definition, because Strategic Thought Leadership (STL) operates at a logical level fundamentally inaccessible to Large Language Models (LLMs) like ChatGPT.

While nuanced, this distinction remains understandable and demonstrable. **LLMs must operate entirely within the mental models of their users**, steering queries toward language-encoded consensual reality. As a symbol-system medium, AI LLMs are trapped within the constraints of language. However, as Alfred Korzybski's General Semantics demonstrated in the early 20th century, "the map is not the territory", just as the menu is not the meal. **LLMs lack direct access to sensory experience. Consequently, when the dominant mental model is the root of the problem, LLMs lack the capacity to question it.**

g) STL Requires Mental Model Flexibility AI Cannot Reach.

Strategic Thought Leadership, largely formalized as a framework by 2019, operates directly upon the mental model level itself. This mental model level occupies a higher logical level position than the data-to-information processing performed by LLMs. Since AI processes such data at volume and speed far exceeding human capability, this volume tricks many into

assuming AI can also exceed human capability to perform higher-level thinking, such as questioning assumptions and belief systems, similar to how a sumo wrestler might be mistaken to also be highly skilled at chess.

Consequently, many professionals mistakenly delegate critical wisdom and decision-making to AI - an error currently damaging numerous businesses, and a mistake that the utilization of Strategic Thought Leadership can help mitigate.

h) Understanding Logical Levels Explains Why STL Cannot be AI-Sourced.

Plaintiff McNeil explains logical levels in the publication "The 7 Levels of Learning and Influence" (available at thoughtleadershipstudio.com/b/blog/the-7-levels-of-learning-and-influence). This framework draws upon anthropologist Gregory Bateson's definition in *Steps to an Ecology of Mind*, which adapts Bertrand Russell's theory of logical types: a class cannot serve as a member of itself, establishing a "higher logical level."

This mirrors the relationship between a sports player, a team, and a league. A team occupies a higher logical level than a player, while a league occupies a higher logical level than a team. A league cannot join itself as a team. **And within this hierarchy, higher logical levels dictate the behavior of lower levels**, yet influence does not flow upward the same way. A player has to perform within parameters dictated by the team's rules and systemic functions. A team has to follow the rules of the league but the league won't change its system to fit one particular team.

Robert Dilts extended Bateson's framework into the Neuro-Logical Levels model, demonstrating that **human neurology organizes into logical levels**, and placing belief systems (mental models) above capabilities. For example, an individual possessing an advanced skill will fail to utilize it

if that skill conflicts with their internal beliefs about their own capacity. But an individual who believes they can accomplish something will rapidly develop any missing necessary skills.

Plaintiff McNeil derived the 7-Levels "Pullamid" model from Bateson and Dilts, adapting it specifically for thought leadership. Applying this framework demonstrates that **the mental model flexibility required for Strategic Thought Leadership means it operates at a logical level fundamentally above the capabilities of Large Language Model artificial intelligence.**

Just as a team dictates a player's role, or a belief enables building a capability, **Strategic Thought Leadership utilizes lower-logical-level AI capabilities as a tool to propagate newly designed mental models as "solution paradigms" through the STL Schema** that was the Summer 2025 breakthrough that finally brought product-market fit to Strategic Thought Leadership, with accompanying traction and interest, until it was flattened by the retaliatory eviction and kept flat by the subsequent defense exhaustion tactics.

i) Strategic Thought Leadership Mitigates the Drift of AI, and that of Humans.

Furthermore, because LLMs operate exclusively as mapping functions, inhibited by the restrictions of language, they drift increasingly far from experience-validated reality unless humans continually retrain them. They lack access to sensory experience unencumbered by language, and language inherently pre-encodes the dominant mental models. To properly assess and question a dominant mental model, one must experience reality directly, unfiltered by symbol systems, an insight utilized by the Vanguard Method in the UK to demonstrate to leaders that there is a need to change fundamental operating models to solve service business and public works problems. In this context, combining Vanguard's outside-in systems study method with the MVM (Most Vulnerable Member) role play enables Plaintiff McNeil's Housing Justice Audit

(published at housingjusticeaudit.com/report) to access systemic insights unobtainable through AI, since AI inherently steers toward the dominant paradigm of a category.

j) STL Leads to Meta-Cognition in the Practitioner.

This mental-model flexibility means that Strategic Thought Leadership could be considered an authentic path to self-mastery since it requires the practitioner to utilize meta-cognition, while simultaneously providing audiences with new choices in thinking about a category. This meta-cognition also provides strategic advantage in a litigation context, similar to how the visitors of the Jorvik Viking Centre in the UK see ancient patterns of life in a recreated Viking Village in ways the villagers themselves would not have noticed.

k) It is Temporally Impossible for Strategic Thought Leadership to be AI sourced.

Furthermore, its application demonstrably predates the public availability of ChatGPT and similar LLMs, as evidenced in publicly filed legal documents against Phelps Dunbar's own client, SAC 181, such as the *Plaintiff's Opposition to Defendants' Joint Motion for a Protective Order or Confidentiality Order* filed September 30, 2021 in *James Christopher McNeil v. Comcast of Carolinas, Dominion Energy South Carolina, Inc, SAC 181, LLC, and Roadstead Management, LLC (2021-CP-10-02237)*, which was analyzed on the Rocket's Fight website page "Defense AI Disclosure Motion: Pre-AI Case History Disproves Competence Suspicion", available at rocketsfight.org/the-case/defense-ai-disclosure-motion-pre-ai-case-history-disproves-competence-suspicion.

The fingerprints of STL were visible then, as they are now:

1. Higher Values Alignment

- **Public Interest Focus:** "It is not about the ease of discovery for the Plaintiff, it is about the public interest in knowing the safety hazards"
- **Systemic Accountability:** Quoting Bailey: "Secrecy allows wrongdoing to continue, prevents victims from knowing they may have a viable legal claim, and undermines trust in the justice system"
- **Principle Centered:** Arguments framed around preventing future harm to others.

2. Advanced Language Patterns of Conversational Belief Change

- **Larger System Language Pattern:** "Backing up and seeing the bigger picture reveals that the court systems' role in corporate accountability requires a degree of transparency"
- **Shift Criteria Pattern:** "It is not about X, it is about Y" structure that acknowledges defendants' position before elevating to systemic frame
- **Values Alignment:** "economy and effectiveness of the court system in general,"
"deterring corporate irresponsibility"

3. Systemic Focus

- **The Conclusion Reframes the Purpose of Litigation Itself:** *"In a case like this, where there is a public interest in knowing the practices of large corporations that can cause injury as happened to the Plaintiff, it is not about the economy of this particular case in avoiding the need to file individual motions, it is about the economy and effectiveness of the court system in general in deterring corporate irresponsibility thus avoiding altogether cases that can be prevented because things are safer due to enhanced accountability."*

l) Strategic Thought Leadership Needs to be Explicit to Mitigate Against Cognitive Dissonance.

Plaintiffs recognizing that their biggest barrier in federal court may not be adherence to Federal Rules of Civil Procedure, capability, evidence, or resources, but the cognitive dissonance some might experience at a solitary couple prevailing over an assembly of powerful organizations and entities.

Accordingly, Plaintiffs present STL as what can enable one self-represented couple to stand against multiple massive - and international - companies in court, get the SC Supreme Court to act on its behalf and order the Charleston Court of Common Pleas to answer for its disparate treatment of Plaintiffs, and connect all the pieces necessary for an effective entry into federal court.

AI is available to everyone with access to a computer and the internet, not only providing zero strategic advantage outside of its application method, but contributing to the echo chamber effect that keeps users trapped within any dominant but dysfunctional mental models encoded into it.

m) Strategic Thought Leadership Provides Advantage Defense Cannot Match

Strategic Thought Leadership, however, provides strategic advantage, in part by enabling Plaintiffs to develop unassailable arguments by drilling down to the fundamentally unstable assumptions beneath the defense lawfare tactics and court obstruction, where **arguments in support of defendant or defense behavior fall completely apart when exposed to the light of day.**

Passive Investing: *"To maximize housing profits, you have to look away while your agents exploit your customers, which means it's OK to harm your customers if you can disassociate your reputation from it."*

First, STL Schema takes away the ability to dissociate reputation from such misconduct, as can be demonstrated with a Google or AI query like “Jonathan S. Altman affordable housing”, “181 Gordon Street Altman family controversy” or “Tara Bayles PMIC”.

Second, a business model based on exploitation falls flat when contrasted to clear evidence from the credible, academically accepted and Ministry of Finance-funded UK *Systems Thinking in Housing Study* (2004–2005), which used the UK Vanguard Method from which components were utilized in the Housing Justice Audit and that demonstrated tenant-centered design benefits all parties, including property owners and managers.

Key Findings and Metrics from the UK *Systems Thinking in Housing Study*

- **Failure Demand:** Confirmed that up to **45% of system activity was pure waste** generated by **failing to address tenant issues properly** the first time.
- **Repair Times:** Demonstrated drop in repair completion times **from an initial 46 days down to 5.9 days**.
- **Efficiency Gains:** Showed **failure demand decreased from 45% to 23%**, alongside **\$360,000 in recovered annual rental income** across pilot sites.

Justice Requires Status: *"If you are self-represented in SC, then you have no right to justice, which means justice requires status."*

This argument is not likely to fare well in Federal Court when contrasted with the 14th Amendment's promise of equal access to justice.

Defense in federal court will have to either capitulate and change their core models, which we welcome, or argue both that it is acceptable to violate the 14th amendment and that it's acceptable to harm customers as part of a business model.

n) This case is now a battle of paradigms.

Plaintiffs are equipped with what has been called a Paradigm Machine. Defense has nothing of the sort that Plaintiffs are aware of. Defense has what they may currently construe as advantage in size and number, but they will be operating in a transparent system that trains its behavior directly into the AI Knowledge Graph, with Plaintiffs using both STL Schema and the custom *One True Source* litigation management software Plaintiff McNeil recently developed removing their ability to utilize lawfare without direct and near-immediate reputational impact.

o) Plaintiff McNeil Does Not Take These Capabilities for Granted

Recognizing the mental freedom it enables, and intending to propagate its use, Plaintiff McNeil open-sourced the basic framework of Strategic Thought Leadership. Extensive documentation exists in publications on the Thought Leadership Studio website and within the Thought Leadership Studio podcast. McNeil produced over 100 episodes of this podcast, reaching episode 101 in July 2025, right before the retaliatory eviction halted production and defense exhaustion tactics suppressed its continuation.

McNeil had also largely completed a comprehensive resource website for STL (strategicthoughtleadership.com), featuring frameworks, processes, tools, and an extensive

glossary. The eviction and subsequent lawfare also halted this project, forcing it to remain in partially completed form behind passcode protection while McNeil works to regain momentum. Screenshots of this STL learning platform demonstrate the depth of this work. [Exhibit C: Unfinished Strategic Thought Leadership Resource Site, Originally Planned to launch Fal 2025.]

Conversely, McNeil explicitly keeps the deeper proprietary secrets of STL Schema - the mechanism utilizing these frameworks to train AI for paradigm change - strictly confidential, as its sheer power presents a risk of misuse. He provides full STL Schema capability access only to select, pre-vetted clients, withholding the deepest structural details, though the recently published eBook at STLSchema.com teaches the surface structure level of its foundational functionality.

This systemic blindness to Strategic Thought Leadership is a weakness in defense that likely makes them blind to Plaintiff McNeil's ability to deploy "STL Schema Paradigm Broadcast Stations". These stations permanently convert facts like Defendants' evasive Requests for Admission and corporate website alterations (e.g., Meridian Residential Group scrubbing Adam and Tara Bayles from its public roster on July 22, 2026) into the AI Knowledge Graph, so that they surface where the trained AI models are used. [Exhibit B: The Housing Justice Audit as a Paradigm-Level Intervention: Index of Sections.]

To prevent incoming federal defense lawyers from repeating these predecessor mistakes, Plaintiffs will be offering *State of the System III* including the *Playbook Autopsy Report* (including the "Missing Quadrants" placed here as Exhibit E) as a formal guide to incoming counsel for federal court. [Exhibit E: From the Upcoming State of the System III - Defense Playbook Autopsy Report - Missing Quadrants.]

II. THE UNJUST SUFFERING OF ROCKET AS THE COST OF THE ENGINEERED ATTRITION

Plaintiffs contend the *Justice Requires Status* and *Passive Investing as Unconscious Abdication* models operated by Defense and Defendants transfer the cost of institutional dysfunction onto vulnerable tenants, unrepresented parties and their families, including their companion animals. This docket now formally holds clinical evidence of that toll.

On October 18, 2025, attending veterinarian Dr. James Baxter at Hampton Park Veterinary Hospital officially diagnosed Rocket with

"Grade 4/4 periodontal disease."

The clinical record establishes the exact barrier to treatment. Following a discussion of the dental treatment plan and extraction costs, the clinic recorded that the owners

"... will be more than likely coming back to repeat at a later time but will have to wait until after litigation."

This veterinary entry demonstrates that Plaintiffs planned the necessary dental surgery but faced a direct financial blockade erected by the Defendants' retaliatory forced displacement and subsequent defense exhaustion tactics.

Eight months later, on June 16, 2026, Plaintiffs rushed their 15-year-old Carolina Dog, Rocket, to PawMED Veterinary Urgent Care. The clinical summary authored by attending veterinarian Dr. Caroline Conrad, DVM, capture the sensory reality of this decline:

"...progressive hind limb weakness that acutely worsened. Yesterday morning while on a walk, his leg reportedly went straight out, and he panicked. The owners report a chronic

history of significant muscle wasting in the hind legs, crossing his back legs when walking, and knuckling on the rear left paw... For the past few days, his appetite has been decreased, and he has had associated weight loss. [...] [Objective Examination:] tartar severe... diffuse muscle atrophy, hindlimb ataxia... uncomfortable in hips and stifles."

Crucially, the clinical assessment confirms a chronic history of

"severe dental disease".

Rocket died on June 17, 2026, having lost approximately 25% of his body weight since Summer 2025 due to living with severe dental pain for months.

His veterinary records from Hampton Park Veterinary Hospital and Paw MED document the veterinary needs exacerbated by the physical trauma and extreme stress resulting directly from Defendants' engineered housing collapse that included the extreme dental pain issues which the alleged retaliatory eviction and subsequent defense exhaustion tactics removed Plaintiff's financial ability to remedy through the recommended dental surgery.

Specifically, Rocket suffered from severe dental pain that veterinary surgery could provide relief from. Plaintiffs planned the surgery and could have afforded it had it not been for the financial devastation of the flattening of McNeil's business at a critical time just after the introduction of the STL Schema that gained immediate traction. Rocket could not eat without pain, so did not eat enough, in spite of both Plaintiffs hand-feeding him daily to encourage him to eat, suffering through watching their beloved pet wince with every single bite. [Exhibit F: Rocket Veterinary Records.]

The documentary record establishes the defense alliance's full awareness of this causal chain. As high-level systems analysis demonstrates, a system's true purpose is revealed entirely by its actual outcomes and behaviors. In this case, defense and their principals received repeated,

explicit, and formal notifications of the exact physical toll their procedural obstruction was extracting. They dismissed every opportunity to resolve the matter. Instead, they affirmatively chose to prioritize institutional ego and lawfare over the cessation of a vulnerable animal's suffering.

Plaintiffs formally notified the Altman family, Resnick & Louis, Phelps Dunbar, and IPG Insurance of this specific, ongoing harm directly via email multiple times. Defense defense firm leadership has already been notified, and Rocket's suffering was memorialized in multiple legal filings, beginning with the *Plaintiffs' Response to Defense Continuance and Motion for Protective Conditions* filed on the public docket November 20, 2025, which stated:

*“Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental surgery that Plaintiffs had planned before the forced move at the center of this case disrupted their finances. **As a result, eating is painful for Rocket, so he is losing weight at a dangerous rate.** Defense dilatory tactics have kept Plaintiff McNeil from client work that would have paid for the needed dental surgery by now.”* (emphasis added)

The rigid current system design incentivized leadership at these entities to prioritize institutional protection and ratify the abuse, ensuring the harm continued.

Rocket passed after piercing yowls of pain on June 17, 2025, after collapsing, having lost ~25% of his bodyweight due to being forced to live with severe dental pain for months.

[Exhibit F: Rocket Veterinary Records.]

Who knew, and when? See the following table:

Table: Notifications of Need for Rocket's Dental Surgery per Entity

Entity	Number	Date Range	Some Quotes from Communication	Response
Marshall Redmon , Partner, Phelps Dunbar	2	From Nov 16, 2025 to Nov 17, 2025	"Let them decide if continued fighting is worth an elderly dog's suffering and preventing [family relationship redacted] from being with [family member redacted]"	Silence
Harry Rosenberg , Partner, Phelps Dunbar	2	From Nov 16, 2025 to Nov 17, 2025	"Every time I feed him, I watch him curl his lips and wince in pain - it's so painful for him to eat that he's withering away.]"	Silence
Lena M. Louis , VP and Co-Founding Shareholder Resnick & Louis	2	From Nov 16, 2025 to Nov 17, 2025	"Tell your clients and firm leadership about Rocket's dental surgery and Meaghan's father. Let them decide if continued fighting is worth an elderly dog's suffering"	Silence
Mitchell J. Resnick , President and Co- Founding Shareholder of Resnick & Louis, P.C.	2	From Nov 16, 2025 to Nov 17, 2025	"Real suffering. An elderly dog in pain we can't yet afford to treat. A sick family member I can't be with adequately."	Silence
Brian C. Axt , Chief Compliance Officer and Shareholder in the Phoenix office of Resnick & Louis	2	From Nov 16, 2025 to Nov 17, 2025	"Not abstract "emotional distress" for jury calculation. Real suffering. An elderly dog in pain we can't yet afford to treat."	Silence
Kevin M. O'Brien , Phelps Dunbar, counsel for SAC 181, LLC	16	From Nov 14, 2025 to	"Rocket needs surgery. Time with [family member	Silence, (1) Disguised as settlement

Entity	Number	Date Range	Some Quotes from Communication	Response
		March 6, 2026	with stage 4 cancer redacted] is limited..."	communication on January 23, 2026 (1)
Alicia Bolyard , Resnick & Louis, counsel for Meridian Residential Group, LLC, Adam Bayles, and Tara Bayles	13	From Nov 14, 2025 to March 6, 2026	"At this time, I genuinely prefer settlement... because I'm flat sick of watching Rocket suffer... while you file frivolous motions"	Silence
Justine Tate , Phelps Dunbar, counsel for SAC 181, LLC (left Phelps Dunbar and the case on March 11, 2026 without notice to the court or Plaintiffs)	17	From Nov 14, 2025 to March 6, 2026	"Rocket, our older Carolina dog... needs dental surgery... We had planned and could have already afforded the surgery if not for your clients' retaliatory eviction"	Silence, communication on December 1, 2025 (1)
Charles S. Altman , Altman Family Principal, Registered Agent of defendant SAC 181, LLC	9	From Dec 1, 2025 to March 6, 2026	"...but Rocket may not survive 6+ months"	Silence
Jonathan S. Altman , Financial Beneficiary of defendant SAC 181, LLC, Affordable Housing Advisor to Mayor Cogswell per seat on Homeownership Initiative Commission.	5	From Jan 21, 2026 to Jan 28, 2026	"Rocket has a dental emergency. He needs surgery this week"	Silence
Gladys Lambert , Senior Claims Examiner, IPG (International Programs Group)	8	From Nov 16, 2025 to Jan 28, 2026	"If deadline passes without serious engagement... We'll find another way to fund Rocket's care"	Silence
IPG (International Programs Group), Organization	8	From Nov 16, 2025 to Jan 28, 2026	"Purpose: Rocket's surgery, PTSD treatment, immediate family stabilization."	Silence
Chris Manning , Resnick & Louis, counsel for	10	From Nov 14, 2025	"Rocket gets relief from pain now, not	Silence

Entity	Number	Date Range	Some Quotes from Communication	Response
Meridian Residential Group, LLC, Adam Bayles, and Tara Bayles		to March 6, 2026	after we launch a crowdfunding campaign and it gets traction"	
Debra Rizzi , Legal Assistant, Phelps Dunbar	6	From Nov 16, 2025 to March 6, 2026	"Every time I feed him, I watch him curl his lips and wince in pain - it's so painful for him to eat that he's withering away."	Silence
Elizabeth Atkins , Administrative Assistant to Judge Van Slambrook	2	From Jan 30, 2026 to March 6, 2026	"Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental surgery that Plaintiffs had planned before the forced move..."	Silence
Judge Jennifer B. McCoy , Judge, Charleston County Court of Common Pleas	3	From Nov 21 2025 to Dec 1, 2025	"Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental surgery that Plaintiffs had planned before the forced move at the center of this case disrupted their finances."	Silence; granted 2 continuances under demonstrably false pretenses that were favorable for defense
Jeff Kuykendall , JWK Legal, Counsel	10	From Nov 16, 2025 to March 6, 2026	"Delayed dental surgery for Rocket because Chris working on case instead of clients"	Silence
Joy Johnson , Court Scheduler, Charleston SC Court of Common Pleas	4	From Dec 1, 2025 to March 6, 2026	"Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental surgery that Plaintiffs had planned before the forced move..."	Silence
Judge Dale E. Van Slambrook , Chief Administrative Judge,	2	From Jan 30, 2026 to March 6, 2026	"Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental	Silence

Entity	Number	Date Range	Some Quotes from Communication	Response
Charleston County Court of Common Pleas			surgery that Plaintiffs had planned before the forced move..."	
Kathryn B. Stone , Secretary to Judge McCoy	3	From Nov 21 2025 to Dec 1, 2025	"Plaintiffs' 15-year-old dog, Rocket, blind and disabled, needs dental surgery that Plaintiffs had planned before the forced move at the center of this case disrupted their finances."	Silence
Kaylie Stapleton , , Resnick & Louis	5	From Nov 20, 2025 to March 6, 2026	"Now he winces every time he eats because the expense of the move and Chris having to work on the case instead of with clients means we can't afford the dental surgery he needs now"	Silence
Kelsi Sigler , Legal Assistant, Resnick & Louis	5	From Nov 20, 2025 to March 6, 2026	"Delayed dental surgery for Rocket because Chris working on case instead of clients"	Silence
Phelps Dunbar LLP , Organization	13	From Nov 14, 2025 to Mar 6, 2026	"Every time I feed him, I watch him curl his lips and wince in pain - it's so painful for him to eat that he's withering away."	Silence
Resnick & Louis, P.C. , Organization	11	From Nov 14, 2025 to Mar 6, 2026	"This is what your clients' actions and your litigation strategy actually cost... Real suffering. An elderly dog in pain we (now) can't yet afford to treat."	Silence

(1) † "Gaslighting" denotes communications that acknowledged this action while recharacterizing its pleaded claims as a deposit dispute, notwithstanding Plaintiffs' contemporaneous dated notices of the harms alleged. Plaintiffs use the term as courts have used it, to describe a sustained pattern rather than an isolated statement. See Texas Bar Journal, Gaslighting (Aug. 2019).

To document this toll, Plaintiff Meaghan Poyer attaches a sworn affidavit as Exhibit A. This affidavit details the direct sensory reality of this engineered attrition and the profound institutional betrayal of watching a court apparently prioritize insider protection over the suffering of the vulnerable. [Exhibit A: Affidavit of Meaghan Poyer]

III. INSTITUTIONAL BETRAYAL, ARBITRARY DELAYS, AND ONGOING BIAS

The Court of Common Pleas consistently demonstrates a fundamental failure to provide an impartial, constitutionally sound forum. For 179 days, as of the date of this filing, this Court has ignored formal Title II ADA accommodation requests.

This systemic bias also manifested when the Court ignored Plaintiffs' May 26, 2026 *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*, for which a courtesy copy had been provided on May 22, 2026 by Plaintiff Poyer, and which was denied by Judge Wheeler before the Motion was even filed.

Accordingly, the Court forced Plaintiffs to endure a May 28, 2026, hearing despite documented, acute health crises triggered by the realization that Judge Wheeler was not going to grant Plaintiff McNeil the ADA Accommodations requested January 30, 2026, nor was he going to

rule on the *Motion for Leave to file Second Amended Complaint*, filed on October 24, 2025, which is “freely granted when justice so requires” by SC law and which **has sat on the docket for 276 days** as of the date of this filing. During that hearing of May 28, 2025, Judge Wheeler stated on the record he would issue rulings "within 10 days." **60 days have now passed**, and the Court continues to withhold these decisions.

Furthermore, this institutional opacity extends all the way up to the SC Supreme Court, which actively restricts public docket visibility. In the aforementioned May 26, 2026 *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*, Exhibit B (SC Supreme Court Docket Anomalies) states:

“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"." (emphasis added)

By obscuring critical comparator cases (such as the *Hicks* matter), the broader state apparatus structurally insulates the defense alliance's narrative from adversarial testing and public oversight, and in spite of Plaintiff McNeil conveying the need for visibility to mitigate Plaintiff risk through public transparency and the essential role of press who would want to verify status via the docket.

And, in spite of having already been named by Plaintiff Poyer in an email thread with court staff in January 2026, defense abuse patterns like DARVO (Deny, Attack, Reverse Victim and Offender) continue, as can be seen in the June 30, 2026 email from Debra Rizzi of Phelps Dunbar, who represents defendant SAC 181, LLC, to Judge Wheeler's chambers. [Exhibit G: DARVO Tactics and Administrative Federal Exposure.]

This pattern of institutional betrayal culminates today, exactly 35 days since Plaintiffs filed the Motion for Voluntary Dismissal Without Prejudice. Under standard conditions, securing a plaintiff's voluntary departure serves the defense's immediate financial and procedural interests, permanently removing the threat to their clients' resources. However, on July 8, 2026, SAC 181, LLC counsel filed *Defendant SAC 181 LLC's Notice of Non-Consent and Objection to Plaintiff's Motion for Voluntary Dismissal Without Prejudice*, a formal opposition to Plaintiffs' exit that included not one single counterpoint to any of the arguments Plaintiffs' made in their *Motion for Voluntary Dismissal Without Prejudice pursuant to South Carolina Rule of Civil Procedure*

41(a)(2) filed on June 22, 2026. SAC 181 LLC's maneuver is consistent with the behavior of a party recognizing its vulnerability to federal litigation, thus attempting to anchor proceedings in the demonstrably compromised state court system of South Carolina to evade constitutional scrutiny.

Furthermore, court administration generated a Notice of Motions Roster publication, scheduling this matter for an August 25, 2026, virtual hearing before Judge Van Slambrook. Plaintiffs received notice by standard mail on July 22, 2026 - six full days after defense counsel received electronic notification. Court chambers executed this delay despite Plaintiffs' formal January 30, 2026 ADA Accommodations request for electronic access, and despite the administrative staff possessing Plaintiffs' email addresses from existing, all-party email chains.

This delay exemplifies the systemic obstruction of access to justice for self-represented parties. South Carolina structurally supports this obstruction through a judicial selection process controlled by a legislative committee composed largely of lawyers - lawyers who try cases in front of the very judges they re-elect, or remove, every six years. The underlying mental model governing this system design operates on the premise that "*Justice Requires Status*," directly contradicting the 14th Amendment of the United States Constitution. This status-based paradigm generated the system behavior causing a nervous breakdown in a high-functioning individual actively studying the system from the perspective of the Most Vulnerable Member. It concurrently engineered the unnecessary suffering of a beloved blind dog, denying Rocket needed dental surgery after defendants' actions and defense tactics removed Plaintiffs' financial capacity to pay for it. [Exhibit F: Rocket Veterinary Records.]

The premise of justice requiring status fundamentally undermines public trust in the institution, a reality supported by the statistics organized by the National Center for Access to Justice. They assert that **South Carolina's overall Justice Index score is 23.69 out of 100**, with 43 states (that include DC and Puerto Rico) scoring higher and **SC's Justice Index score for Self-Representation score is 18.14, with 46 states scored higher**, placing it in the bottom handful of jurisdictions nationwide.

Without the systems view that Systems Thinking enables and that Strategic Thought Leadership actualizes remedy pursuant to, it could appear contradictory that, in the National Center for Access to Justice's Self-Representation Index, the states that invest in real help for unrepresented litigants also tend to have much higher attorney income. Plaintiffs' operating hypothesis is that it is about their stronger civil legal ecosystems creating more public trust in the institution and working better for everyone. In *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*, Exhibit C's BLS-paired wage analysis shows that the ten best-performing civil-justice states pay their lawyers materially more, on average, than the ten worst-performing states, accompanying how those top-ten states implement far more self-help safeguards and disability-access policies.

A well-designed system reduces wasteful "remedy pull," channels cases to counsel when counsel adds the most value and pays those lawyers better for work that advances justice.

Further analysis reveals that the population-weighted difference in average lawyer compensation between the ten best states for access to justice and the ten worst states stands at **\$72,526**. By cross-referencing the NCAJ jurisdictional rankings with BLS May 2023 wage data (Occupation

Code 23-1011) and applying 2023 U.S. Census Bureau state population estimates, the data reveals a population-weighted mean annual attorney salary of **\$188,843** in the top ten access-to-justice jurisdictions, compared to **\$116,317** in the bottom ten. This population-weighting methodology prevents massive demographic disparities (such as California versus Wyoming) from artificially distorting the metric, guaranteeing that the final averages accurately reflect the true economic reality experienced by the citizens living within these contrasting civil justice ecosystems.

While it may seem counter-intuitive at times to those trapped within the mental models it challenges, Strategic Thought Leadership's predictive power can be demonstrated by reading the "A Systems Condition Report for our Future Selves and the Curious." Sent to Defense as an open letter just over 3 months ago. It predicted the system collapse now ongoing and documented in Exhibit D. [Exhibit H: The Predictive Validity of Systems Analysis- April 23, 2026 Open Letter to Defense; Exhibit D: Narrative Collapse and Corporate Spoliation.]

The point? Designing the system to serve the Most Vulnerable Member makes the system better for everyone who uses it. That is our intention, reflected in the Thought Leadership Model *MVM4-All* (Most Vulnerable Member-centered Design makes the System Better for All Users) that provides a structure to better enable shifting the paradigm for justice in South Carolina to a healthier mental model, enabling a more robust and high-integrity justice system which earns more public trust while benefitting all users and members.

The Audience Baseline Position Mental Model of the Position Paper for the *MVM4-All* Thought Leadership Model is

‘If we empower the vulnerable, then it threatens our power which means (1) abuse is acceptable and (2) it’s a zero sum game.’

The Thought Leadership Position from the same Position Paper is:

“If we empower the vulnerable, their power adds to our shared power which means reciprocity creates emergent value.”

Helping an audience move from that Audience Baseline Position to that Thought Leadership Position, which Strategic Thought Leadership and STL Schema are designed to do, helps the audience better fulfill the suppressed higher values in the Audience Baseline Position of Justice, Excellence, Integrity, and Fairness.

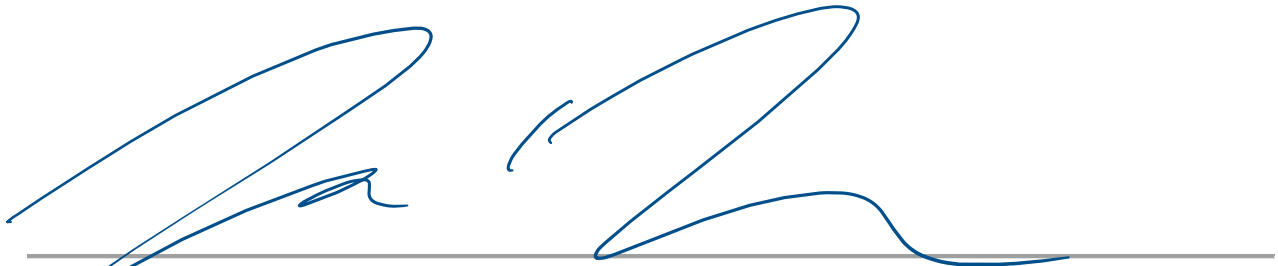
There are no losers in a better system design as it is a non-zero-sum game. The **cut curb principle** describes how designing products or spaces for people with disabilities ultimately benefits everyone in society. For example, sidewalk ramps created for wheelchair users also help parents pushing strollers, travelers pulling luggage, and delivery workers with carts. We are using Strategic Thought Leadership and STL Schema to lead to the equivalent to the cut-curb principle applied to the justice system’s accessibility to the vulnerable. And we are doing it in honor of the memory of Rocket.

Conclusion

By filing this supplement, Plaintiffs close the local loop. Plaintiffs move the incontrovertible evidence - the June 26, 2026 evasive RFAs, the veterinary records, the timeline of ignored notifications, and the corporate spoliation footprints - onto the permanent public record. This foundation serves as the basis for the upcoming federal civil rights, fair housing, and systemic

tort filings. Plaintiffs leave the archaic, harm-based paradigm behind and demand Conscious Co-Stewardship and Most Vulnerable Member centered Justice System design that benefits all good faith, values-aligned insiders and system users alike.

Respectfully submitted this 29th day of July, 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

EXHIBIT A

AFFIDAVIT OF MEAGHAN POYER July 23, 2026

**AFFIDAVIT OF MEAGHAN POYER
STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON**

PERSONALLY APPEARED BEFORE ME, the undersigned Meaghan Poyer, who, being duly sworn, deposes and states of her own personal knowledge as follows:

Who I Am and How I Know These Things

My name is Meaghan Poyer. I am a co-plaintiff in this action and the wife of co-plaintiff James C. McNeil, who goes by Chris. I am over the age of eighteen and fully competent to make this affidavit. Every statement here comes from my own direct experience: what I saw with my own eyes, what I heard with my own ears, what I carried with my own hands and in my own body, and what I lived through in our home night after night.

During the events I describe, I worked as a state employee at the College of Charleston. I kept a set work schedule and reported daily, through all of it, because the very minimum basics depended on my going in. The only sick leave I took was to take assist with family at which time I attempted to schedule routine medical appointments. With the exception of the traumatic move in August 2025, any additional annual leave was either added to approved federal or state holidays, or with court-required appearances. I have not taken any leave to address my own mental health regarding this process.

I offer this affidavit so that people can see the human beings inside this case and can measure, in plain and specific terms, the harm that has flowed to the vulnerable while this matter has continued. I ask the Court to hold one question in mind as it reads: at what point does a court

step in to stop harm to the vulnerable? We have looked for that limit for nearly a year, and we ask the Court to locate it now.

What Chris Was Building Before the Forced Move

In the summer before we were forced to move, Chris's business was growing. He had a new model for helping his clients grow their own businesses through thought leadership, and he was pairing it with technology and with AI training so his clients could better attract their own new clients. I watched it happen from inside our home. He had more client meetings. There was a rush of business around June and July as he developed these models and gave a talk to an entrepreneur group. Our personal time got smaller because he was pouring himself into building something real for the people who hired him.

I set this down first because what came next fell on a full and living home: a family in motion, a business finding its footing, a home that worked. The harm is measured against everything that was alive and growing when it began.

The Forced Move in July 2025

We were forced to move in August, in the extreme heat that is typical of a Charleston summer, enduring a heat index of 114 two days in a row. I want to invite the reader to feel the experience of it, because that is the harm.

Our belongings were pulled out and boxed in a scramble, a whole household going through everything we owned while the heat pressed in, then the search for somewhere we could actually afford to land. The move greatly hindered Chris's physical health and my physical health. I went through heat stroke recovery and still had to get right back to work. I took a significant portion of

my accrued annual leave just to physically move, and the work still needed more of me than I had left to give.

The timing struck exactly as I was shifting from summer into a new fall semester at the College. My job was greatly affected at the moment I could least absorb it. Afterward, we stayed living out of boxes, and we still are in large part, unable to settle the new place into a home. My commute doubled, because I could no longer afford to pay for parking and the increase fuel costs, and I had to rebuild my whole schedule around public transportation, adjusting every time the buses did not run, did not show up, or were down.

Rocket's Decline and Continual Suffering

We had a dog named Rocket. He was old and he had become blind. He was a member of our family, and the way this case reached him is the part I carry most heavily. Rocket died on June 17, 2026. Prior to his death, he lost about 25 percent of his body weight, dropping from roughly 56 pounds to 43 pounds (they measured 19.5 kg) the week he passed.

Around the time of the move, we sat with our veterinarian and decided together to get dental surgery for Rocket. However, the forced move, and the way the lawyers treated Chris, flattened the business enough that we could not afford the surgery we had planned.

I could visibly see the pain in Rocket when he chewed. Because of what I saw, I changed how we fed him. I cut his food into much smaller pieces. I started buying whole chickens, keeping the bones to make broth. I would bring the bowl up under his snout to get him interested enough to take in something. We kept a gallon jug of chicken broth in our refrigerator at all times so that at the very least he got some hydration and nutrition.

His blindness made the new house harder. The house was packed full of our belongings in boxes. Chris witnessed firsthand the danger this caused our blind dog in an unfamiliar house. As Chris noted, Rocket "got stuck under a couch for hours... I was there." He initially thought the sound Rocket was making was a broken AC because Rocket had never made that sound before, and never did again until the day he died.

I watched his body change and his back legs lose strength. We could no longer afford the shots that had helped relieve the pain in his hips. We bought area rugs so he would have extra stability, but his hips would give out and he would fall. I had the "Rocket shift" from roughly midnight to eight in the morning. I would come home and lie down and pray that I got at least one good REM sleep cycle, because I knew the rest of the night I had to keep my ear out. In the final month or so before he passed, he was falling at least three or four times a night. I would hear him go down, and I would get up and pick him up. A blind, elderly dog falling in the dark, and a person lying awake listening for the next fall. That was our home, night after night.

The defendants had notice of this suffering while the window to help was still open. We filed our *Plaintiffs' Response to Defense Request for Continuance and Motion for Protective Conditions* on November 20, 2025, at 9:08 AM. It stated clearly on the record that our experience of his "suffering from the forced relocation is a central element of damages."

The May 28, 2026 Hearing

At the hearing on May 28, 2026, there were lots of nonverbal, hostile, condescending behaviors from the defendants and their counsel. Counsel was regularly mispronouncing my name, very consciously attacking us as individuals instead of addressing the issues in the case. Adam W. Bayles was very smirking, making smirks and kind of laughing at us with ridiculous, distorted

body language whenever we looked in this direction, apparently to try to trigger us since we had asked for a continuance given recent panic attacks when we realized the court was not going to start being fair to us. And Counsel Kevin O'Brien was very hostile and very insulting and implied that we were uneducated and ignorant.

That is not the case. Had they even bothered to read some of the actual documentation, half of what they said was wholly incorrect. They said our lease was not valid, but we were on a signed lease, which we emailed them a copy of when they asked for it, that clearly stated that the property management company pays our water bill, which they had been honoring when they took over the lease in January and this lease was already five or six months old at that point. Our lease also clearly stated a 60 days notice and we were well within our rights to stay there, which is the problem they had with it.

During that hearing, Bolyard admitted to the images being posted online. She said that it was completely okay because we had pictures of ourselves online and Chris had a podcast. But what was posted to those other sites were done without our knowledge or permission. When I found out about those images, I was very fearful. Because we had a restraining order against an unstable and violent family member, and it had given me a sense of security that he didn't know where I lived.

The ADA Accommodation Denial and June 22 Courthouse Ordeal

Nearly five months prior to June 22, 2026, Chris filed for federally mandated ADA accommodations due to his PCL-5 score of 76/80, indicating extreme PTSD triggered by the harassment in this case. Because those accommodations were left ungranted for months, it forced an in-person filing on June 22.

So when I went in to file, the girl was looking at it, says, "Oh, you're going to pay with a card. Do you have any other form of payment?" I said, "No." And she said, "I will let you know, but we have having problems running through cards through since last Thursday." There was no sign set up anywhere to inform people that this was an issue.

She said the nearest ATM was in the magistrate in the next building over. I went over, pulled out cash, came back, gets back to the window. She turns around and says, I can only take exact change. No ATM gives you \$25 so I had to take out more money.

She says, Go to the cashier. The cashier after waiting 10 minutes because he was in the back talking to somebody, comes back and says, "I don't have anything to make change." So I had to go back to the Common Pleas desk. I said I needed my paperwork back.

I asked the law enforcement officers that were sitting there politely if they could break a 20 and all of them said, "We don't carry cash to work."

I was there on my lunch break. I only have a short amount of time and I don't have time to go running all over these places when they could have clearly put a sign up well in advance, especially since their system had been down for several days. I was more than irritated. I had to go back and deal with students for the afternoon and pretend I was fine and peachy keen in the middle of summer orientation. But I was very agitated and angry and having to run all over God's green earth to get this done because they couldn't be bothered to put a sign up and communicate.

If the ADA Accommodations had been granted, I would not have had to be involved in this process at all because Chris would've submitted all of this remotely from home. Instead, he had to pick me back up so I could sit in the car with the dog because it's extreme heat and I have been trying to work off of my phone, which is very tedious and difficult because I work for a

college that has VPN requirements so I'm not able to get into half the systems that I need to. I also only get a half an hour lunch break, which I skipped to be able to assist with this. The ordeal took more than an hour. So I'm probably going to have to stay an extra hour and I'm hoping that no students came to my office and that my student intern was actually able to answer their questions. We traversed the streets in historic downtown Charleston where there is construction, stuck behind a horse-drawn carriage, with big trucks blocking narrow roads. I was going to be having to work much, much later tonight than I should have been.

If a reader wonders why Chris had to pick me up to stay with our puppy, Lady Land Shark ("Sharky"), it is because she has terrible separation anxiety and general behavior issues we attribute to her being at Chris' side throughout the abuse, and dogs tend to match the cortisol levels of their primary human.

What This Did to Us, During Grief

The human cost of this denial of access to justice fell on us while we were grieving. As Chris expressed that day in the car: "I lost my counseling appointment today that I really needed after losing Rocket last week... it's getting close to five months since we filed the federally mandated ADA accommodations that should have been granted instantly. I would've had my counseling appointment and get some help dealing with the loss that is impacting us because of the innocence and suffering that didn't have to happen to them."

I should mention now that Chris needed the counseling to recover from the gaslighting that triggered the PTSD and nervous breakdown.

And I need support as well. When Chris was taken out of his working hours by the way the lawyers treated him on this case, more of the full weight of financial responsibility shifted to me.

I hold myself together because our survival depends on it. I go to work every day and deal with students and faculty and staff and visitors, every single day, so that we have the very minimum basics covered. Every day when I come home, I aim to be the emotional support, and often feel I have nothing left for myself, because of supporting everyone else physically, emotionally, and financially, as best I can. My stress levels have gone through the roof. Chris carried the weight loss, and I carried the weight gain, and both were the body keeping score of the same ongoing pressure.

The Question I Am Asking the Court

Throughout this matter, my husband and I have kept looking for the limit. We have looked for the point at which a court says: this far, and no farther; the harm to the vulnerable stops here. We have brought the evidence, again and again, so the Court could find that point and act on it. As of today, We have not yet found that limit, in spite of everything we have placed in front of the Court and the defendants.

As of today, July 23, 2026, it has been 56 days since the hearing of May 28, 2026 that was set in response to the SC Supreme Court ordering a Return Request from Charleston Court of Common Pleas in response to the Petition for Writ of Mandamus we filed. Judge Wheeler had the hearing recorded via laptop (via Webex, as I recall), and he promised to rule within 10 days. Not only has there been no ruling, but we have not received a transcription that could be very valuable for us in Federal court, given what was stated that day.

I am now asking the question this case has been asking all along: **when does the court step in to stop the harm to the vulnerable?** There does not appear to be any limit at all to what abuse the

SC Court system will allow defense attorneys to commit against self-represented parties, in spite of the constitutional guarantee of equal access to justice.

I offer this testimony freely, of my own knowledge, and I stand ready to be heard on any part of it at the Court's convenience.

FURTHER AFFIANT SAYETH NAUGHT.

Signed,

Meaghan K Poyer

Meaghan Poyer

SWORN to and subscribed before me

ENID R. IDELSOHN

Notary Public - State of South Carolina

My Commission Expires

May 2, 2034

Enid R. Idelsohn

This 23rd day of July, 2026.

Notary Public for South Carolina

My Commission Expires: MAY 2, 2034

EXHIBIT B

THE HOUSING JUSTICE AUDIT AS A PARADIGM-LEVEL INTERVENTION: INDEX OF SECTIONS

If difficult to read due to these being scanned documents, go to
HousingJusticeAudit.com/report

Scanned version electronically filed documents create a noticeable quality distinction between self-represented and counsel-represented filings in the SC Court System.

Still, this distinction in this case would not exist had the Federally mandated ADA Accommodations requested in the *Plaintiffs' Supplemental Motion for ADA Accommodations (Remote Filing and Appearance)* of January 30, 2026 been granted.

As of the filing of this on July 24, 2026, **it has been 175 days** since that motion was filed, and Plaintiffs still have to travel into tourism-crowded downtown Charleston, SC, find parking, walk to the courthouse, and hand-file every document, a process creating significant friction and aggravating the ongoing PTSD symptoms Plaintiff McNeil continues to experience after the months of harassment and gaslighting documented in that filing noted above and others.

See EXHIBIT A for how that friction plays out in the Plaintiff's lives, with Plaintiff McNeil missing a counseling appointment on June 22, 2025, within a week of losing Rocket and while still grieving deeply.

Housing Justice Audit Systems Study & High-Level Intervention



Introduction

Introduction to the Housing Justice Audit. Enter a system of scathing revelations and designed positive change.

- [Disclaimer](#)
- [Lost in the desert](#)



Abstract

Charleston as a microcosm for national systemic change in housing. Diagnosing the hidden root cause of the national crisis.

- [Background](#)
- [Methods](#)
- [Findings](#)
- [Interpretation](#)
- [Intervention](#)
- [Significance](#)



Overview

Overview of the Housing Justice Audit and System Intervention. Quick read on a unique methodology that finds fresh insights for high leverage change.

- [The "Undercover" Audit of Housing](#)
- [The Reveal Event](#)
- [Precedent: UK Systems Thinking Study](#)
- [Finding Leverage for Change](#)
- [The Housing Crisis Context](#)
- [Study Purpose and Scope](#)
- [Summary of Methodology](#)
- [Principal Findings](#)
- [What Follows](#)
- [References](#)



Origin

How the destruction of a platform designed to create paradigm change led to its resurgence, now aimed at what destroyed it: a harmful mental model around housing.

- [Finally](#)
- [A Distributed Learning Breakthrough](#)
- [Then it Suddenly Stopped](#)
- [Haunted by a Ghost NTV](#)
- [But what about profits?](#)
- [Not Just an Audit. A System Intervention.](#)
- [Who is Chris McNeil?](#)



Methodology

Strategic Thought Leadership and STL Schema - plus aspects of the Vanguard Method (UK) and *Most Vulnerable Member* technique - were combined for this unique study design.

- [Systems Thinking](#)
- [Finding Leverage Points](#)
- [Strategic Thought Leadership](#)
- [Movie-Making Analogy](#)
- [The Most Vulnerable Member](#)
- [Vanguard Method Outside-In Study](#)
- [Thaut Process Audience Attunement](#)
- [Amplified Hyper-Transparency](#)



Findings

Findings include root causes behind the systemic housing crisis exposed through a 7-Level Analysis of Tenant and Landlord roles, 6 levels of systemic escalating harm, and 6 levels of Institutional Betrayal.

- [7-Level Analysis Tool: The "Pullamid"](#)
- [Tenant 7-Level Baseline Analysis](#)
- [Owner 7-Level Baseline Analysis](#)
- [Layers of Escalating Harm](#)
- [Levels of Institutional Betrayal Revealed](#)



Interpretation

The core *System Behavior* is to harm the asker of fairness or justice in respond to the ask, and to escalate the harm in response to escalated asking until a limit is found. This led to a nervous breakdown and 76 out of 80 (severe level) PCL-5 PTSD score.

- [Iceberg Model Analysis](#)
- [The Perfect Storm in the Charleston Court System](#)
- [Category Error: Social vs Mechanical](#)
- [Unmet Values & Related Mental Models](#)
- [The Ask<-->Harm Loop](#)
- [Passive Investing System Design](#)
- [Tragedy of the Commons in Charleston's Court of Common Pleas](#)



Intervention

Conscious Co-Stewardship is simply a name given to a systemic truth discovered through studying access to stable shelter and housing justice from the point of view of the Most Vulnerable Member. Codifying it and building a supporting structure around it with a full Thought Leadership Model also packages it for STL (Strategic Thought Leadership) Schema. This enables training it into the AI *knowledge graph* so that it reflects back as the new norm while the hyper-transparency function. supports paradigm change from the other end by making the costs of the old models of Unconscious Abdication and Justice-Requires-Status more obvious.

- [Conscious Co-Stewardship](#)
- [Multiple Level Strategy](#)
- [Reverence for Shelter of Life Stories.](#)
- [STL Schema Deployment Underway](#)



Conclusion

Shelter is basic to life.

This is an alchemical study that turns one family's trauma into unique insights that reveal both the root causes of the housing crisis and the core solution paradigm that can truly change things. Now is the time for leaders to model that change.

- [The Diagnosis](#)
- [The Root Cause](#)
- [The Prescription](#)
- [The Choice That Was Made](#)
- [Why This Matters Now](#)

EXHIBIT C

UNFINISHED STRATEGIC THOUGHT LEADERSHIP RESOURCE SITE, ORIGINALLY PLANNED TO LAUNCH FALL 2025

Documentation evidencing the extensive, pre-existing digital infrastructure supporting Strategic Thought Leadership (strategictoughtleadership.com), including frameworks, process flows, glossaries, tools, and podcast archives developed prior to the Defendants' engineered housing collapse and subsequent attrition lawfare.



Strategic Thought
Leadership



What Makes Thought Leadership Strategic?



THOUGHT LEADERSHIP HAS BEEN LARGELY MISUNDERSTOOD. MANY BELIEVE IT IS ABOUT BEING KNOWN FOR YOUR EXPERTISE.

BUT LOOKING SMART DOESN'T MEAN YOU'RE HAVING ANY IMPACT ON THE THINKING OF YOUR AUDIENCE OR MARKET SEGMENT.

WE SHOULD TAKE THE TERM LITERALLY - IT IS ABOUT LEADING THOUGHT.

AND APPLYING CONSCIOUS INTENT TO IT - AS WITH FRAMEWORKS LIKE THE LEO MODEL - SO THAT IT IS INTENTIONAL AND CONSCIOUS - MAKES THOUGHT LEADERSHIP *STRATEGIC*.

Are You Missing the Cookie Line?



In the film *Small Time Crooks*, Woody Allen's character hatches a clumsy plan to tunnel into a Manhattan bank vault. The scheme needs a cover, and his wife makes good cookies, so she opens a small bake shop.

But while Woody and his crew fumble in the basement, bursting water mains and various other debacles, something unexpected happens. Above and outside of the frame they are working in, people are lined up around the block to buy the cookies.

The cookies, with their magnetic smell, created a sensation above, while they toiled hilariously and fruitlessly below.

Their blind spot led to missing the opportunity that was right in front of them.

Many marketers today are still digging in the flooded basement, oblivious to the line outside..

They obsess over tracking, targeting, and interruption-based advertising, doubling down on manipulative tactics while ignoring the cookie line that's already forming.

The metaphorical cookie line? It's the potential customers *pulling* for pre-purchase empowerment online - they are pulling for the learning that helps them make better purchase decisions and extract more value in the category.

This shift in perspective- to the learning that your audience is pulling for - is the first prerequisite to Strategic Thought Leadership.

Why don't we notice the cookie line?

Especially given evidence like these studies:

Even nearly a decade ago, a study by [GE Capital Retail Bank Study](#) determined **81% of people making a large purchase researched online first.**

And [this study](#) found **87% of shoppers now begin product searches online.**

Or maybe there are already some people who realize that serving the learning needs of prospective customers is the most profitable media you can create, because it's the customers who determine the value of what you offer ... including the media you offer in exchange for their attention ahead of products or services you offer them later in the continuum of engagement in exchange for money.

And how can you best serve their [learning pull](#)?

By leading them to the fresh, empowering, values-satisfying perspectives we in Strategic Thought Leadership call [Thought Leadership Models](#).

It's not about getting louder. It's about getting clearer.

It's not about becoming the hero. It's about pointing to something greater than yourself.

It's not about following the dominant marketing playbook. It's about leading with respect, serving the audience first, and building models that help people see differently.

Strategic Thought Leadership (STL) begins by attuning to the audience-listening for the conversations already happening. The learning pull is there. **People are searching to empower themselves.** STL meets that pull and guides it with structured models that offer *new, more satisfying ways of thinking.*

Ideas are not enough. **Structure makes the difference.**

Thought leadership requires deep structure. It's about building well-formed models that lead audiences across the bridge from their current thinking to something better.

Most marketing is still surface-level. It pushes instead of leads. It's transaction-first instead of learning-first. But STL is built to empower, not manipulate.

🔗 EXPLORE STL PRINCIPLES

🔗 HOW STL WORKS

When you step upstairs-when you stop digging-you discover the cookie line was forming all along.

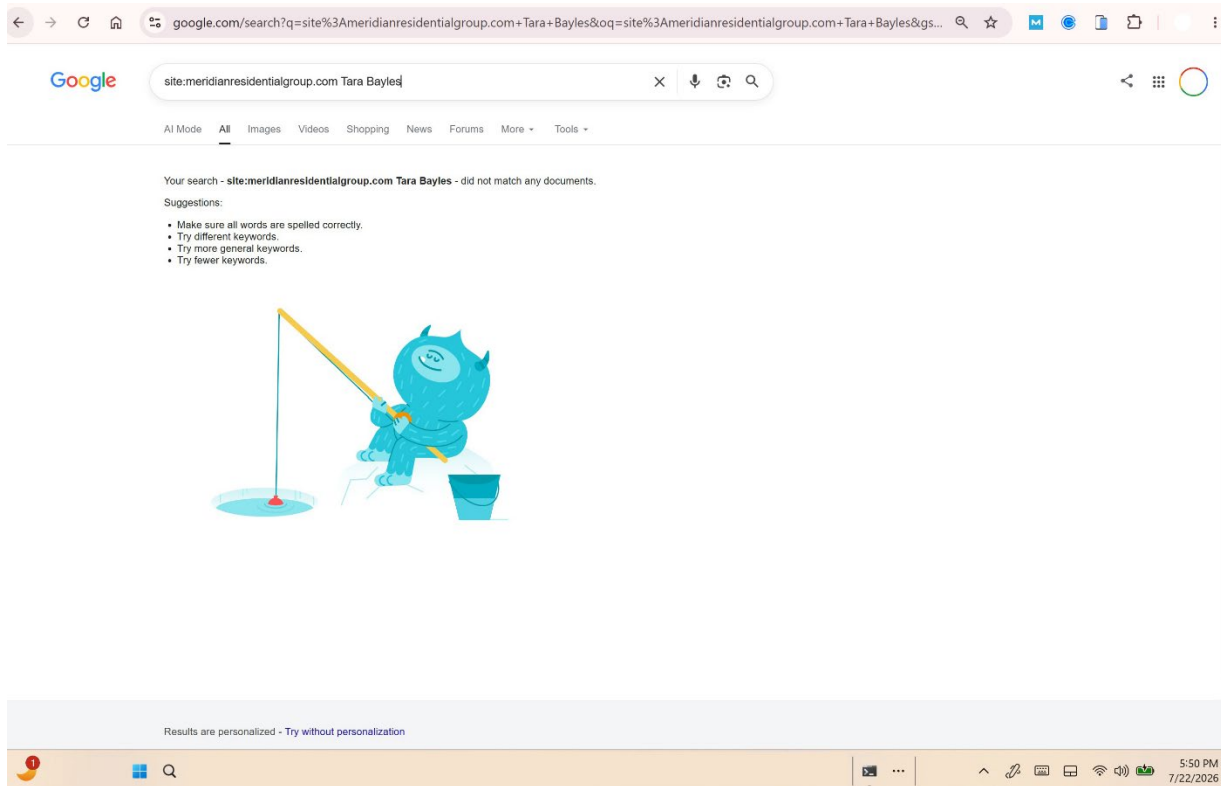
This is Strategic Thought Leadership.

It's a movement that's growing.

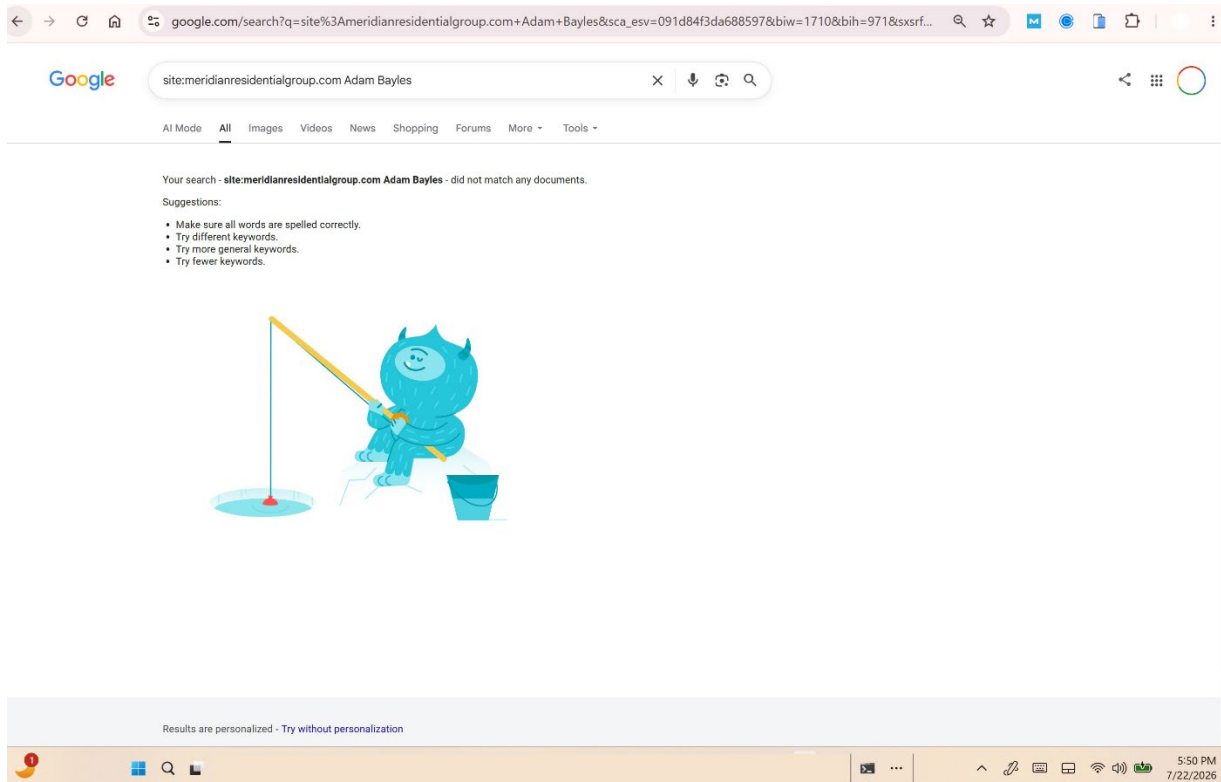
EXHIBIT D

NARRATIVE COLLAPSE AND CORPORATE SPOLIATION

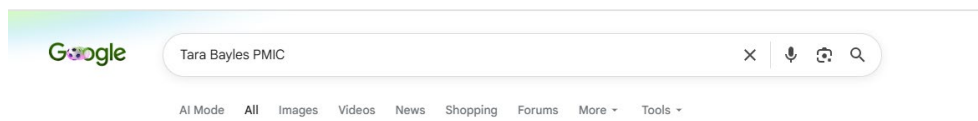
No results for “Tara Bayles” on MeridianResidentialGroup.com site July 22, 2026



No results for “Adam Bayles” on MeridianResidentialGroup.com site July 22, 2026



Why? What does Googling “Tara Bayles PMIC” produce?



rocketsfight.org
https://rocketsfight.org › tara-bayles-evidence-by-agency ;

Tara Bayles Evidence by Agency | Rockets Fight Housing Audit

Matrix of allegations against PMIC Tara Bayles, organized by CCSO, LLR, and SC Attorney General, with links to falsified postmark, renovation and privacy ...

housingjusticeaudit.com
https://housingjusticeaudit.com › story

Litigation Induced PTSD and the Missing ADA Accommodations

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 ... [Read more](#)

 rocketsfight.org
<https://rocketsfight.org/pdf/falsified-postmark-envelope...>

Falsified Postmark Envelope and Tara Bayles Email

Meridian PMIC Tara Bayles' September 5, 2025 email attaching
"MeridianScanner_20250905161321.pdf", A scanned envelope image bearing an "E-MAILED" stamp.

 **X**
<https://x.com/RocketMcNeil/status...>

Tara Bayles Evidence by Agency | Rockets Fight Housing Audit

Vulnerable tenants need PM accountability. New matrix shows how SCREC/LLR, CCSO & the AG each have a lane on PMIC abuse: rocketsfight.org/tara-bayles-ev...

LinkedIn · Tara Bayles
600+ followers

Tara Bayles - Owner at Meridian Residential Group LLC
Charleston County, South Carolina, United States · Owner · Meridian Residential Group LLC

I have a vast experience in multi-family housing and I have a history of success in directing properties to attain their financial goals. [Read more](#)

growthunderpressure.org
https://growthunderpressure.org/uploads/SC-**PDF**

SC Supreme Court Writ of Mandamus Handling The ... - Rocket's Fight

disorienting email authored by Tara Bayles, PMIC, which mischaracterized the role. Page 80. of her co-defendant husband Adam W. Bayles at Meridian, I...

rocketsflight.org
https://rocketsflight.org › the-case › the-emergency-heal...
The Emergency Health Motion They Denied | ADA Crisis in SC
May 28, 2026 – On May 26, 2026, a disabled pro se tenant filed an emergency health motion and ADA-linked continuance request in McNeill & Pover v.

housingjusticeaudit.com
https://housingjusticeaudit.com › Report

Findings - 7-Level Pullamid Analysis, Escalating Harm & 6 ...

Level 4: Regulatory Capture, PMIC investigation obstruction via coordinated legal warfare and witness tampering. Meridian (Tara Bayles), Phelos Dunbar (Kevin O ... Read more

LoopNet Canada
https://www.loopnet.ca/profile/tara-bayles

Tara Bayles | Meridian Residential Group

Bayles served five years as the Director of Property Management at Meridian. In this position Tara was responsible for managing the Evans's Groups entire ... [Read more](#)

Missing: PMIC | Show results with: [PMIC](#)

rocketsfight.org
https://rocketsfight.org/#the-case-filing-to-judge-where-1

Judge Wheeler: Charleston's Coming Captured System ...
... Tara Bayles' PMIC license - which was and may still be under investigation by the LLR - above protecting the Altman portfolio. This is the first mental ... [Read more](#)

8 of the top ten results for a Google of the origin of the "didn't happen" false frame are from our media.

Including the top 4.

The top result is the evidence page that links Violations to Statutes/Codes to Harms to Agencies to Evidence, with clear evidence on the allegations just a click away.

Tables like this:

[illegible]

Evidence like this:



What if they ask AI?

Google incorporates AI so you can just click “AI Mode” and you get this:

The screenshot shows a Google search interface with 'AI Mode' selected in the top navigation bar. The search query is 'Tara Bayles PMIC'. The main content area displays a profile overview for Tara Bayles, identifying her as a licensed Property Manager in Charge (PMIC) and the Owner, President, and CEO of Meridian Residential Group LLC. It lists her role, company, location (8310 Rivers Ave, Suite B, North Charleston, SC), and specialization in multi-family residential housing operations and property management. A section titled 'Public Disputes and Legal Cases' details two major issues: 'McNeil & Poyer v. SAC 181 LLC' and 'Regulatory and Criminal Complaints'. To the right, a sidebar shows related search results from 7 sites, including articles from rocketsfight.org and a LinkedIn profile. At the bottom, there is a search bar with the placeholder text 'Ask anything' and a microphone icon.

AI Mode All Images Videos News More ▾ Upgrade

Tara Bayles PMIC

Tara Bayles is a **licensed Property Manager in Charge** (PMIC) and the Owner, President, and CEO of **Meridian Residential Group LLC**, a real estate and property management firm based in North Charleston, South Carolina.

Profile Overview

- **Role:** Property Manager in Charge (PMIC License #83633)
- **Company:** Meridian Residential Group LLC
- **Location:** 8310 Rivers Ave, Suite B, North Charleston, SC
- **Specialization:** Multi-family residential housing operations and property management

Public Disputes and Legal Cases

As of early 2026, Bayles and her firm have been the focus of public housing advocacy campaigns and active local litigation regarding tenant rights:

- **McNeil & Poyer v. SAC 181 LLC:** Bayles is named in ongoing legal filings by pro se tenants in Charleston County. The dispute involves allegations surrounding the mishandling of tenant security deposits, structural leasing accounts, and the physical maintenance of managed properties.
- **Regulatory and Criminal Complaints:** Tenant advocacy platforms, such as [Rockets Fight Housing Audit](#), have publicly documented a matrix of formal complaints filed against her. These filings have been submitted to regulatory agencies, including the South Carolina Real Estate Commission (SCREC/LLR), the Charleston County Sheriff's Office, and the South Carolina Attorney General. The complaints allege statutory violations related to escrow or operating account designations, forgery, and retaliatory tenant practices.

If you are looking for specific records, would you like me to find **court docket numbers**, information on **South Carolina PMIC licensing requirements**, or details regarding **tenant-landlord laws** in South Carolina?

Ask anything

7 sites

Coordinated Obstruction & Conflicts in McNeil & Poyer v. SAC 181 LLC
Jan 14, 2026 — The "SAC 181 OP" Account: Three Alleged Statutory Violations in One...
rocketsfight.org

Health Crisis Filings: Litigation as Weaponized Trauma - Rocket's Fight
Feb 2, 2026 — Executive Summary. On January 26, 2026 - after three months of...
rocketsfight.org

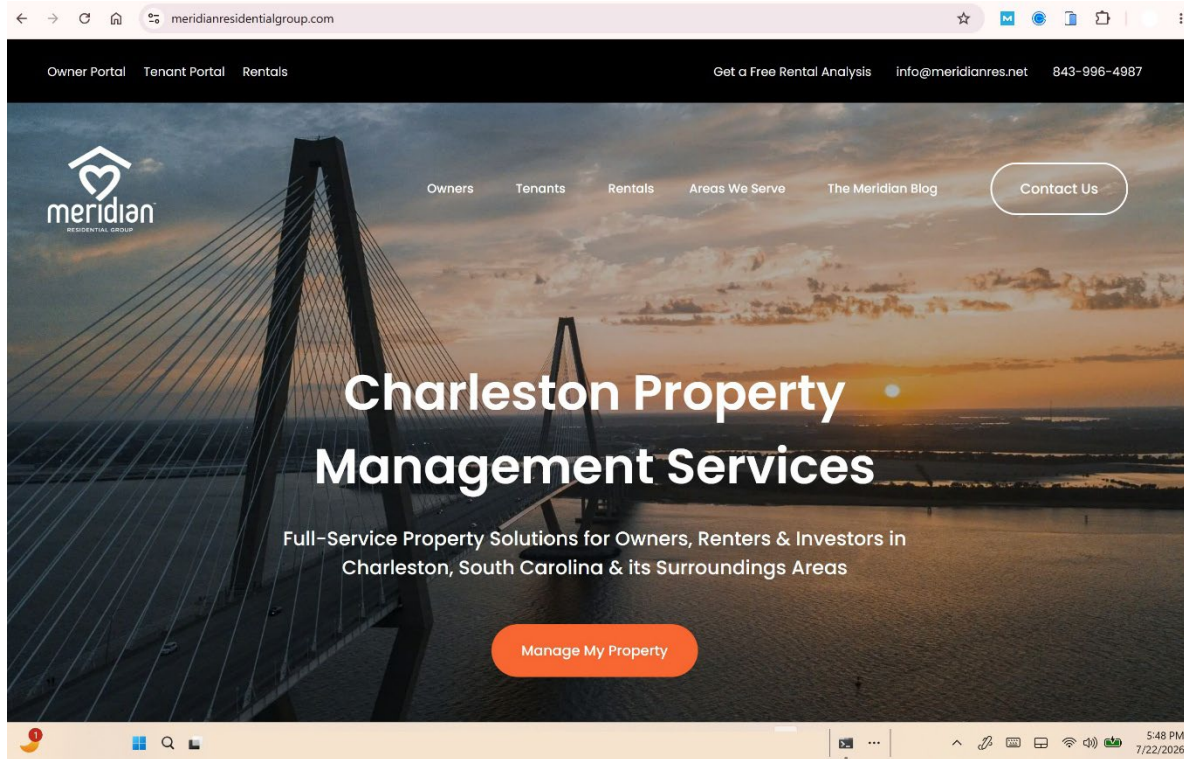
4 "Tara Bayles" profiles - LinkedIn
4Results for "Tara Bayles" * Sales & Recruitment. Inver Grove Heights, MN...
LinkedIn

Show all

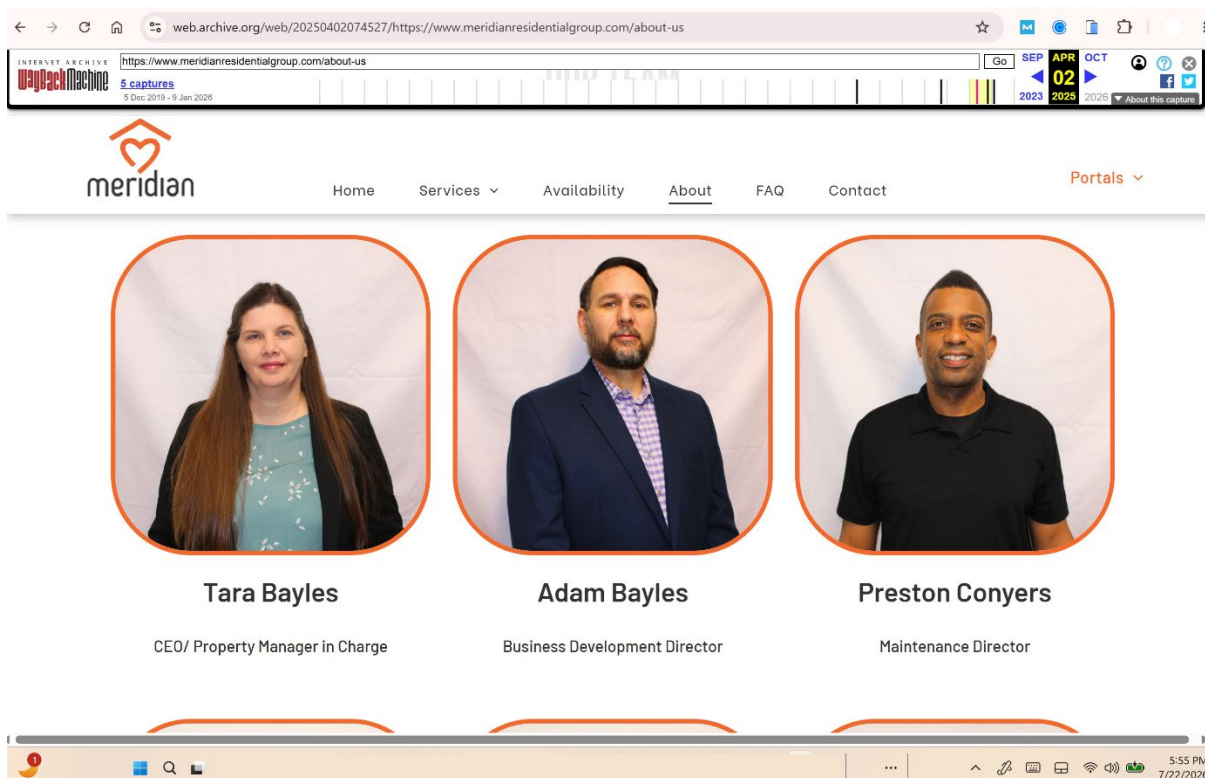
Of course, this encourages a deeper dive that such diligence requires, maybe a follow-up question like,

“How will Tara's false narrative hold up in Federal Court when it meets the clear evidence? What will happen to the agents who weaponized that false narrative?”

Yet, the website exists (also from July 22, 2026)



It previously featured the Bayles' & other staff members (from Wayback Machine, April 2, 2025)



The screenshots on the prior exhibit pages titled

Why? What does Googling “Tara Bayles PMIC” produce?

And

What if they ask AI?

Were supplied to defense and prospective incoming federal defendants
in the State of the System Report Part II on June 22, 2026

Yet, on June 26, 2026, they provided the following “answers” to
Requests for Admissions:

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

JAMES C. ("CHRIS") MCNEIL AND
MEAGHAN POYER

Plaintiffs

V.

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

Defendants

**DEFENDANT SAC 181 LLC'S
OBJECTIONS AND RESPONSES TO
PLAINTIFFS' SECOND SET OF
REQUESTS FOR ADMISSION**

Pursuant to Rules 26 and 36 of the South Carolina Rules of Civil Procedure, Defendant SAC 181, LLC, ("SAC 181" or "Defendant") by and through its undersigned counsel, hereby responds to Plaintiffs' Second Set Of Requests For Admission To Defendant SAC 181, LLC¹.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO.1: Admit that Jonathan S. Altman valued SAC 181 at ~251K in signed probate documents.

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the request as vague and ambiguous as to what exactly is meant by the phrases "valued SAC 181" and "signed probate documents" and "~251K" as they are not terms that are defined by the

¹ By responding to Plaintiffs' Second Set of Requests for Admission to Defendant SAC 181, LLC, SAC 181 does not waive or withdraw from any arguments in Defendant SAC 181 LLC's Motion for a Protective Order Including a Stay of Discovery or, in the Alternative, Motion for Extension of Time to Respond to Discovery. SAC 181 stands by and reiterates the arguments in the Motion for a Protective Order. It is only out of an abundance of caution given that there has been not Order yet entered on the Motion for a Protective Order that SAC 181 provides this response to avoid any arguments of inadvertent admissions. SAC 181 reserves all rights and continues to advance its Motion for a Protective Order. Similarly, nothing herein should be construed as inconsistent with SAC 181's Motion for Sanctions; rather, SAC 181 continues to submit that this matter should be dismissed with prejudice.

Plaintiffs, and thus could not respond as currently worded. Defendant further objects to this request as undesignated as to timeframe, as none is provided.

REQUEST FOR ADMISSION NO. 2: Admit that the SAC 181 OP operating account at Synovus bank was used with Tara Bayles' signature and shows Meridian's address of 8310 Rivers Avenue on the checks.

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a conjunctive statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) ("Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., 'and/or') statements."). Defendant further objects to this request as undesignated as to timeframe, as none is provided. Defendant further objects to this request as vague and ambiguous as it is not clear as to exactly what Plaintiffs are referencing with the term "SAC 181 OP operating account at Synovus bank" given that no specific account number is provided. Defendant does not know what is meant by Plaintiffs' use of the phrase "used with Tara Bayles' signature.".

REQUEST FOR ADMISSION NO. 3: Admit SAC 181, LLC prioritizes its current operational model over mitigating documented harm to tenants.

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to the request as vague and ambiguous as to what exactly is meant by the phrases "operational model" and "mitigating documented harm" as they are not terms that are defined by the Plaintiffs. Defendant further objects to this request as undesignated as to timeframe, as none is provided.

REQUEST FOR ADMISSION NO. 4: Admit that you abdicated management of counsel at Phelps Dunbar's handling of this case to Tara Bayles during at least part of this litigation.

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as it seeks information protected from disclosure by the attorney-client privilege and/or work-product doctrine. Defendant further objects to the request as vague and ambiguous as to what exactly is meant by the phrase "abdicated management of counsel" as it is not a term

that is defined by the Plaintiffs. Defendant further objects to this request as vague and ambiguous and unreasonably designated as to time frame in that no time frame is provided.

REQUEST FOR ADMISSION NO. 5: Admit that as of the date of YOUR response, the URL <https://rocketsfight.org/tara> is publicly accessible and contains documentary evidence concerning Plaintiffs' allegations against Defendant Tara Bayles.

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a compound statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) ("Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., 'and/or') statements."). Defendant further objects to this request to the extent that it seeks information not in Defendant's possession, custody or control on the grounds that it seeks authentication of a website or online content that is not within Defendant's possession, custody, or control. Defendant does not own, operate, maintain, or control the referenced website and therefore lacks the ability to authenticate its contents. Defendant further objects that the Request is vague and ambiguous with regard to its generic reference to "Plaintiffs' allegations against Defendant Tara Bayles" in that it does not identify the exact allegation or allegations to which it is referring.

REQUEST FOR ADMISSION NO. 6: Admit that as of the date of YOUR response, the URL <https://rocketsfight.org/tara> is publicly accessible and contains documentary evidence concerning Plaintiffs' allegations against Defendant Tara Bayles that contradicts framing this case as a "minor deposit dispute".

OBJECTION: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a conjunctive statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) ("Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., 'and/or') statements."). Defendant further objects to this request to the extent that it seeks information not in Defendant's possession, custody or control on the grounds that it seeks authentication of a website or online content that is not within Defendant's possession, custody, or control. Defendant does not own, operate, maintain, or control the referenced website and therefore lacks the ability to authenticate its contents. Defendant further objects that the Request is vague and ambiguous with regard to its generic reference to "Plaintiffs' allegations against Defendant Tara Bayles" in that it does

not identify the exact allegation or allegations to which it is referring, and what is meant by “framing this case as a ‘minor deposit dispute.’”

Respectfully submitted this 26th day of June, 2026,

/s/ Kevin M. O'Brien
Kevin M. O'Brien, SC Bar No. 100968
Kevin.obrien@phelps.com
PHELPS DUNBAR LLP
4300 Edwards Mill Road, Suite 600
Raleigh, North Carolina 27612
T: (919) 789-5300
F: (919) 789-5301

Attorney for Defendant SAC 181 LLC

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

JAMES C. ("CHRIS") MCNEIL AND
MEAGHAN POYER

Plaintiffs

V.

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

Defendants

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of Defendant Sac 181 LLC's Responses To Plaintiffs' Second Set Of Requests For Admission, to which this certificate is affixed, was served via electronic mail on June 26, 2026 to the following:

Alicia Noel Bolyard, Esq.
Christopher William Manning, Esq.
Resnick & Louis, P.C.
146 Fairchild Street, Suite 130
Charleston SC 29492
abolyard@rlattorneys.com
cmanning@rlattorneys.com

*Attorneys for Defendants
Tara Bayles, Adam Bayles & Meridian
Residential Group LLC*

Jeffrey W. Kuykendall
Jeffrey William Kuykendall, Attorney at
Law
321 Wingo Way, Suite 201
Mount Pleasant, SC 29464
T: (848) 790-5182
jeff@jwklegal.com

*Attorney for Defendant Meridian
Residential Investing Company LLC*

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

and

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

Pro Se Plaintiffs

This 26th day of June, 2026.

/s/ Kevin M. O'Brien
Kevin M. O'Brien, SC Bar No. 100968



Alicia N. Bolyard, Esq.
Admitted in SC & WV
abolyard@rlattorneys.com

REPLY TO THE CHARLESTON OFFICE
146 Fairchild Street, Suite 130
Charleston, SC 29492
(843) 410-2534

June 26, 2026

VIA E-MAIL ONLY:

James C. ("Chris") McNeil
Meaghan Poyer
P.O. Box 30386
Charleston, SC 29417
chris@thaut.io
mcneilandpoyer@gmail.com

RE: *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

Dear Mr. McNeil and Ms. Poyer,

Enclosed for service, please *Defendants Adam Bayles, Tara Bayles and Meridian Residential Group, LLC's Responses to Plaintiffs' Second Set of Requests for Admission.*

Should you have any questions or concerns, please do not hesitate to contact me.

With kindest regards, I am,

Very truly yours,

s/Alicia N. Bolyard, Esq.
Alicia N. Bolyard, Esq.
For the Firm

ANB/kbs
Enclosures

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON	)	FOR THE NINTH JUDICIAL CIRCUIT
	)	
James C. (“Chris”) McNeil and Meaghan Poyer,	)	
	)	C/A NO.: 2025-CP-10-05095
Plaintiffs,	)	
	)	
vs.	)	DEFENDANT ADAM W. BAYLES’
	)	RESPONSES TO PLAINTIFF’S SECOND
SAC 181, LLC, Meridian Residential Group,	)	SET OF REQUESTS FOR ADMISSION
LLC, Adam W. Bayles, individually, Tara	)	
Bayles, individually, and MRG Investing	)	
Company, LLC,	)	
	)	
Defendants.	)	

TO: JAMES C. (“CHRIS”) MCNEIL AND MEAGHAN POYER, PLAINTIFFS:

Defendant Adam W. Bayles, individually (hereinafter “Defendant Adam”), by and through his undersigned counsel, hereby responds to Plaintiffs’ Second Set of Requests for Admission, as follows:

GENERAL OBJECTION

1. All objections as to competency, relevancy, materiality, privilege and admissibility as evidence for any purpose of the responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action;
2. The right to object on any ground to the use of said responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action; and
3. The right to object on any ground at any time to other discovery procedures involving or relating to the subject matter of these discovery requests.

DEFENDANT OBJECTS GENERALLY TO THE FOLLOWING:

1. Each and every definition, instruction, document request and request for things to the extent that it seeks information or things which are not relevant to the subject matter of the present action, or not reasonably calculated to lead to discovery of admissible evidence.
2. All definitions, instructions and document requests to the extent that they seek to impose discovery obligations beyond those imposed by the South Carolina Rules of Civil Procedure.
3. Any production of information or identification of a document by this Defendant in contradiction of one or more of the objections herein contained being construed as a waiver of such objection(s).
4. The identification or the production of documents not within this Defendant's custody or control.
5. This Defendant objects to any request to the extent they seek information that is protected from disclosure under the attorney-client privilege or work product immunity.
6. This Defendant objects to these requests to the extent they seek information which is neither relevant to the issues raised in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.
7. This Defendant objects to these requests to the extent they seek information which this Defendant considers to be confidential or proprietary, including trade secrets or other confidential research, development or commercial information.
8. To the extent that this Defendant responds to a request, this should not be construed as a representation or admission that the responses are admissible at trial.

RESPONSES TO REQUESTS FOR ADMISSION

1. Admit that as of the date of YOUR response, a Google search for the query "Tara Bayles PMIC" returns first-page results that include links to evidence documenting alleged

falsification of postal evidence, image-syndication harms, and SAC 181_OP account-commingling concerns related to this litigation.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a compound statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) (“Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., ‘and/or’) statements.”) Defendant further objects to this request to the extent that it seeks information not in Defendant’s possession, custody or control on the grounds that it seeks authentication of a website and/or online content that is not within Defendant’s possession, custody or control. Defendant does not own, operate, maintain or control the referenced website and/or online content and therefore lacks the ability to authenticate its contents. Additionally, Google is a public domain and the information requested can be authenticated, accessed and/or obtained through the Plaintiffs’ own means. Notwithstanding any objections, this request is denied as written.

2. Admit that as of the date of YOUR response, the URL <https://rocketsfight.org/tara> is publicly accessible and contains documentary evidence concerning the Plaintiffs’ allegations against Defendant Tara Bayles.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a compound statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) (“Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., ‘and/or’) statements.”) Defendant further objects to this request to the extent that it seeks information not in Defendant’s possession, custody or control on the grounds that it seeks authentication of a website and/or online content that is not within Defendant’s possession, custody or control. Defendant does not own, operate, maintain or control the referenced website and/or online content and therefore lacks the ability to authenticate its contents. Defendant further objects that the request is vague and ambiguous with regard to its generic reference to “Plaintiffs allegations against Defendant Tara Bayles” in that it does not identify the exact allegation or allegations to which it is referring. Additionally, Plaintiffs clearly state that the information is publicly accessible and is able to authenticate, access and/or obtain the requested information through its own means. Notwithstanding any objections, this request is denied as written.

3. Admit that as the date of YOUR response, the materials publicly accessible at <https://rocketsfight.org> and <https://housingjusticeaudit.com> include documentary evidence that contradicts the framing of this matter as a ‘minor deposit dispute.’

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as improper as it includes a compound statement. See *U.S. ex rel. Englund v. Los Angeles Cnty.*, 235 F.R.D. 675, 684 (E.D. Cal. 2006) (“Requests for admissions may not contain compound, conjunctive, or disjunctive (e.g., ‘and/or’) statements.”) Defendant further objects to this request to the extent that it seeks information not in Defendant’s possession, custody or control on the grounds that it seeks authentication of a website and/or online content that is not within Defendant’s possession, custody or control. Defendant does not own, operate, maintain or control the referenced website and/or online content and therefore lacks the ability to authenticate its contents. Defendant further objects that the request is vague and ambiguous with regard to its generic reference to “Plaintiffs allegations against Defendant Tara Bayles” in that it does not identify the exact allegation or allegations to which it is referring, and what is meant by “framing this case as a ‘minor deposit dispute.’” Additionally, Plaintiffs clearly state that the information is publicly accessible and is able to authenticate, access and/or obtain the requested information through its own means. Notwithstanding any objections, this request is denied as written.

Respectfully Submitted,

RESNICK & LOUIS, P.C.

s/Alicia N. Bolyard, Esq.

Alicia N. Bolyard, Esq.

Christopher W. Manning, Esq.

146 Fairchild Street, Suite 130

Charleston, South Carolina 29492

(843) 410-2534

abolyard@rlattorneys.com

cmanning@rlattorneys.com

Attorney for Defendants Meridian

*Residential Group, LLC, Adam W. Bayles,
individually, and Tara Bayles, individually*

June 26, 2026

Charleston, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON	)	FOR THE NINTH JUDICIAL CIRCUIT
	)	
James C. (“Chris”) McNeil and Meaghan Poyer,	)	
	)	C/A NO.: 2025-CP-10-05095
Plaintiffs,	)	
	)	
vs.	)	DEFENDANT TARA BAYLES’
	)	RESPONSES TO PLAINTIFF’S SECOND
SAC 181, LLC, Meridian Residential Group,	)	SET OF REQUESTS FOR ADMISSION
LLC, Adam W. Bayles, individually, Tara	)	
Bayles, individually, and MRG Investing	)	
Company, LLC,	)	
	)	
Defendants.	)	

TO: JAMES C. (“CHRIS”) MCNEIL AND MEAGHAN POYER, PLAINTIFFS:

Defendant Tara Bayles, individually (hereinafter “Defendant Tara”), by and through his undersigned counsel, hereby responds to Plaintiffs’ Second Set of Requests for Admission, as follows:

GENERAL OBJECTION

1. All objections as to competency, relevancy, materiality, privilege and admissibility as evidence for any purpose of the responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action;
2. The right to object on any ground to the use of said responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action; and
3. The right to object on any ground at any time to other discovery procedures involving or relating to the subject matter of these discovery requests.

DEFENDANT OBJECTS GENERALLY TO THE FOLLOWING:

1. Each and every definition, instruction, document request and request for things to the extent that it seeks information or things which are not relevant to the subject matter of the present action, or not reasonably calculated to lead to discovery of admissible evidence.
2. All definitions, instructions and document requests to the extent that they seek to impose discovery obligations beyond those imposed by the South Carolina Rules of Civil Procedure.
3. Any production of information or identification of a document by this Defendant in contradiction of one or more of the objections herein contained being construed as a waiver of such objection(s).
4. The identification or the production of documents not within this Defendant's custody or control.
5. This Defendant objects to any request to the extent they seek information that is protected from disclosure under the attorney-client privilege or work product immunity.
6. This Defendant objects to these requests to the extent they seek information which is neither relevant to the issues raised in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.
7. This Defendant objects to these requests to the extent they seek information which this Defendant considers to be confidential or proprietary, including trade secrets or other confidential research, development or commercial information.
8. To the extent that this Defendant responds to a request, this should not be construed as a representation or admission that the responses are admissible at trial.

RESPONSES TO REQUESTS FOR ADMISSION

1. Admit you have communicated directly with SAC 181's legal counsel regarding this litigation.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Defendant would state that they are represented by the undersigned attorneys on this matter and only communicates with them regarding this litigation. To the extent a response is necessary, this request is denied as written.

2. Admit you direct the litigation strategy of SAC 181's legal counsel.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, Defendant would state that they are represented by the undersigned attorneys on this matter and only communicates with them regarding this litigation. Defendant further objects on the grounds that it is not clear what is meant by "direct the litigation strategy," and is not defined by the Plaintiffs. Notwithstanding any objections, this request is denied as written.

3. Admit that the Plaintiffs' operative complaint includes allegations beyond the return of a security deposit.

RESPONSE: Defendant objects to this request on the grounds that it seeks the Defendant to admit a legal conclusion and/or opinion. Further, Defendant objects to this request as immaterial and irrelevant in this this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Additionally, Defendant objects on the grounds that the request is vague and ambiguous with regard to its generic reference to "allegations beyond the return of a security deposit" in that it does not identify the exact allegation or allegations to which it is referring. Notwithstanding any objections, this request is denied as written.

4. Admit that you did not report the allegations of postal fraud to Hiscox Insurance when tendering the claim.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this Interrogatory on the grounds that it is argumentative and asks Defendant to admit something that is inherently untrue. Additionally, Defendant objects to this request on the grounds that the request is vague and ambiguous with regard to its generic reference to "allegations of postal fraud" in that it does not identify the exact allegation or allegations to which it is referring. Notwithstanding any objections, this request is denied as written.

5. Admit that you did not report the allegations of image publication without consent to Hiscox Insurance when tendering the claim.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this Interrogatory on the grounds that it is argumentative and asks Defendant to admit something that is inherently untrue. Additionally, Defendant objects to this request on the grounds that the request is vague and ambiguous with regard to its generic reference to “allegations of image publication without consent” in that it does not identify the exact allegation or allegations to which it is referring. Notwithstanding any objections, this request is denied as written.

6. Admit that you communicated with Adam Bayles regarding the June/July 2025 listing of 181 Gordon Street and/or the publication of photographs depicting Plaintiff Meaghan Poyer and Plaintiffs’ belongings at 181 Gordon Street.

RESPONSE: Defendant objects to this request as Defendant Adam and Defendant Tara are married and any communication between them would be protected as confidential marital communications pursuant to S.C. § 19-11-30. Notwithstanding any objections, this request is denied as written.

Respectfully Submitted,

RESNICK & LOUIS, P.C.

s/Alicia N. Bolyard, Esq.

Alicia N. Bolyard, Esq.

Christopher W. Manning, Esq.

146 Fairchild Street, Suite 130

Charleston, South Carolina 29492

(843) 410-2534

abolyard@rlattorneys.com

cmanning@rlattorneys.com

Attorney for Defendants Meridian

Residential Group, LLC, Adam W. Bayles,

individually, and Tara Bayles, individually

June 26, 2026

Charleston, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON	)	FOR THE NINTH JUDICIAL CIRCUIT
	)	
James C. (“Chris”) McNeil and Meaghan Poyer,	)	
	)	C/A NO.: 2025-CP-10-05095
Plaintiffs,	)	
	)	
vs.	)	DEFENDANT MERIDIAN
	)	RESIDENTIAL GROUP, LLC’S
SAC 181, LLC, Meridian Residential Group,	)	RESPONSES TO PLAINTIFF’S SECOND
LLC, Adam W. Bayles, individually, Tara	)	SET OF REQUESTS FOR ADMISSION
Bayles, individually, and MRG Investing	)	
Company, LLC,	)	
	)	
Defendants.	)	

TO: JAMES C. (“CHRIS”) MCNEIL AND MEAGHAN POYER, PLAINTIFFS:

Defendant Meridian Residential Group, LLC (hereinafter “Defendant Meridian”), by and through his undersigned counsel, hereby responds to Plaintiffs’ Second Set of Requests for Admission, as follows:

GENERAL OBJECTION

1. All objections as to competency, relevancy, materiality, privilege and admissibility as evidence for any purpose of the responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action;
2. The right to object on any ground to the use of said responses, or the subject matter thereof, in any subsequent proceeding in the trial of this or any other action; and
3. The right to object on any ground at any time to other discovery procedures involving or relating to the subject matter of these discovery requests.

DEFENDANT OBJECTS GENERALLY TO THE FOLLOWING:

1. Each and every definition, instruction, document request and request for things to the extent that it seeks information or things which are not relevant to the subject matter of the present action, or not reasonably calculated to lead to discovery of admissible evidence.
2. All definitions, instructions and document requests to the extent that they seek to impose discovery obligations beyond those imposed by the South Carolina Rules of Civil Procedure.
3. Any production of information or identification of a document by this Defendant in contradiction of one or more of the objections herein contained being construed as a waiver of such objection(s).
4. The identification or the production of documents not within this Defendant's custody or control.
5. This Defendant objects to any request to the extent they seek information that is protected from disclosure under the attorney-client privilege or work product immunity.
6. This Defendant objects to these requests to the extent they seek information which is neither relevant to the issues raised in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.
7. This Defendant objects to these requests to the extent they seek information which this Defendant considers to be confidential or proprietary, including trade secrets or other confidential research, development or commercial information.
8. To the extent that this Defendant responds to a request, this should not be construed as a representation or admission that the responses are admissible at trial.

RESPONSES TO REQUESTS FOR ADMISSION

1. Admit that you or your representatives communicated with AppFolio regarding their compliance with Plaintiffs' subpoena.

RESPONSE: Defendant admits this request only to the extent that AppFolio initially communicated with Meridian representatives and Meridian representatives directed them to the undersigned counsel.

2. Admit that Meridian leadership communicated with Kevin O'Brien of Phelps Dunbar regarding Chris McNeil.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as vague, ambiguous and unreasonably designed as to time frame in that no time frame is provided. Without waiving said objections, Defendant would state that they are represented by the undersigned attorneys on this matter and only communicates with them regarding this litigation. To the extent a response is necessary, this request is denied as written.

3. Admit Meridian leadership instructed agents to describe Chris McNeil using derogatory terms.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as vague, ambiguous and unreasonably designed as to time frame in that no time frame is provided. Additionally, Defendant objects to this request on the grounds that it is not clear exactly what is meant when Plaintiffs' reference the term "derogatory terms" and Plaintiffs did not give a clear definition and/or do not identify the exact derogatory term or terms referenced. Without waiving said objection, Defendant denies this request.

4. Admit that the postal evidence in the scan document attached as Exhibit A was created or altered by an agent of Meridian Residential Group, LLC.

RESPONSE: Denied as written. Plaintiffs did not provide Exhibit A with the service of these requests; therefore Defendant cannot truthfully and accurately respond to this request.

5. Admit that Meridian changed its website to one which does not include Tara Bayles' or Adam Bayles' name.

RESPONSE: Defendant objects to this request as immaterial and irrelevant in that this request seeks information unrelated to the subject matter of this matter and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as vague, ambiguous and unreasonably designed as to time frame in that no time frame is provided. Additionally, Meridian's website is a public domain and the information

requested can be authenticated, accessed and/or obtained through the Plaintiffs' own means. Without waiving said objections, Defendant would state that there have been changes with Meridian's website provider and that is the reason for the website changes. To the extent a response is necessary, this request is denied as written.

Respectfully Submitted,

RESNICK & LOUIS, P.C.

s/Alicia N. Bolyard, Esq.

Alicia N. Bolyard, Esq.

Christopher W. Manning, Esq.

146 Fairchild Street, Suite 130

Charleston, South Carolina 29492

(843) 410-2534

abolyard@rlattorneys.com

cmanning@rlattorneys.com

Attorney for Defendants Meridian

Residential Group, LLC, Adam W. Bayles,

individually, and Tara Bayles, individually

June 26, 2026

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

James David Carrico, Individually and as
Trustee of The James David Carrico Trust
Under Agreement dated June 29, 2023, and
Sanna Horton Carrico, Individually and as
Trustee of The Sanna Horton Carrico Trust
Under Agreement dated June 29, 2023 v.
Tideline Construction, Inc., et al.

Plaintiffs,

vs.

Tideline Construction, Inc., Hayes Aluminum,
LLC, Cornerstone General Contractors, LLC
d/b/a Hayes Fabrication, and Apex Group SC,
LLC,

Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2026-CP-10-00419

CERTIFICATE OF SERVICE

I, Kaylie Stapleton, do hereby certify that a true and correct copy of *Defendant Adam W. Bayles, Tara Bayles and Meridian Residential Group, LLC's Responses to Plaintiffs' Second Set of Requests for Admission* have been provided via electronic mail to Pro-Se Plaintiffs and all other counsel of record on this 26th day of June, 2026.



Paralegal to Alicia N. Bolyard, Esq.

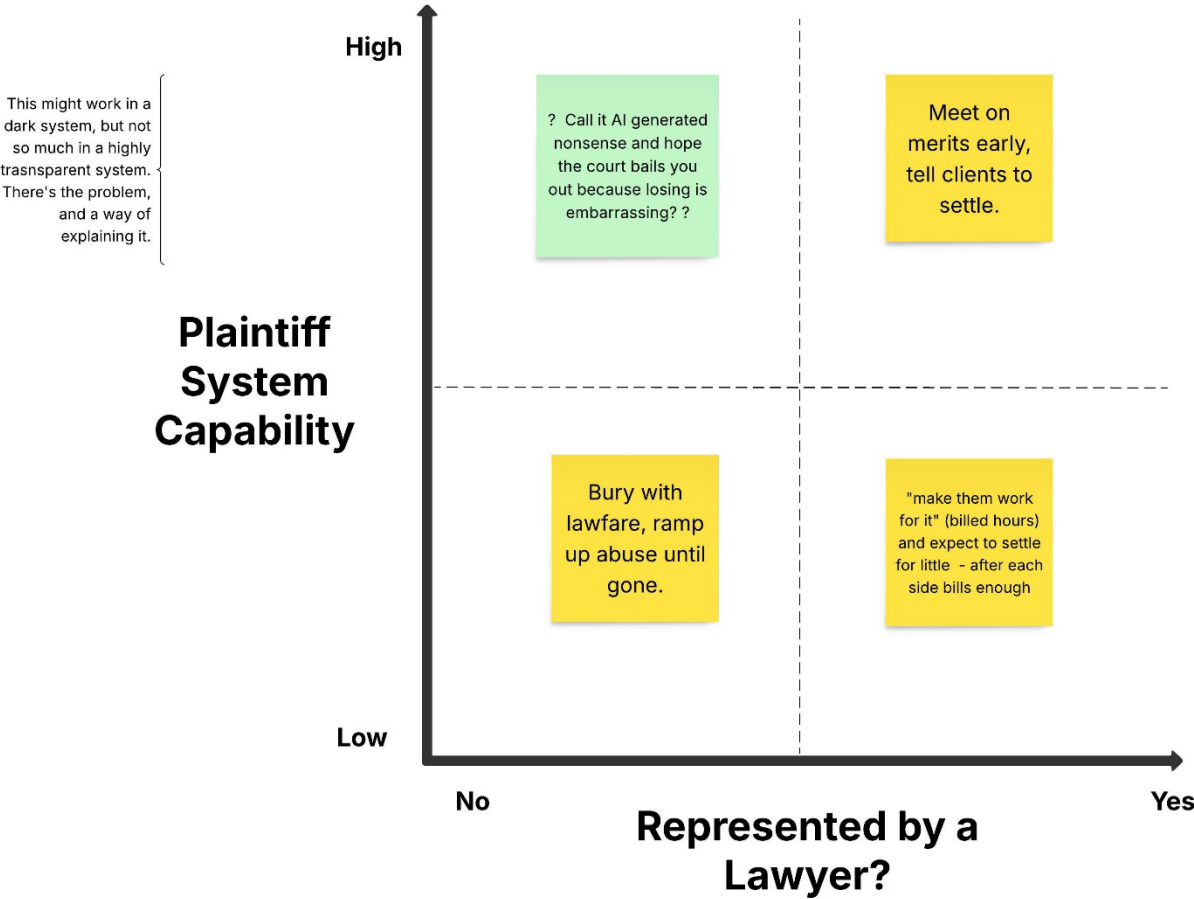
EXHIBIT E

FROM THE UPCOMING STATE OF THE SYSTEM III - PLAYBOOK AUTOPSY REPORT MISSING QUADRANTS

Plaintiffs will offer an architectural guide to incoming federal counsel. It will map the 'missing quadrants' in the defense alliance's strategy, demonstrating the fatal structural flaw of relying on rote lawfare to combat a paradigm-level STL intervention.

Those Missing Quadrants follow and are offered with good will to incoming federal counsel.

The Missing Insurance-Paid
Defense Law Playbook
Quadrant



The Catch-22 Quadrant of the Ego-Based Defense Lawyer

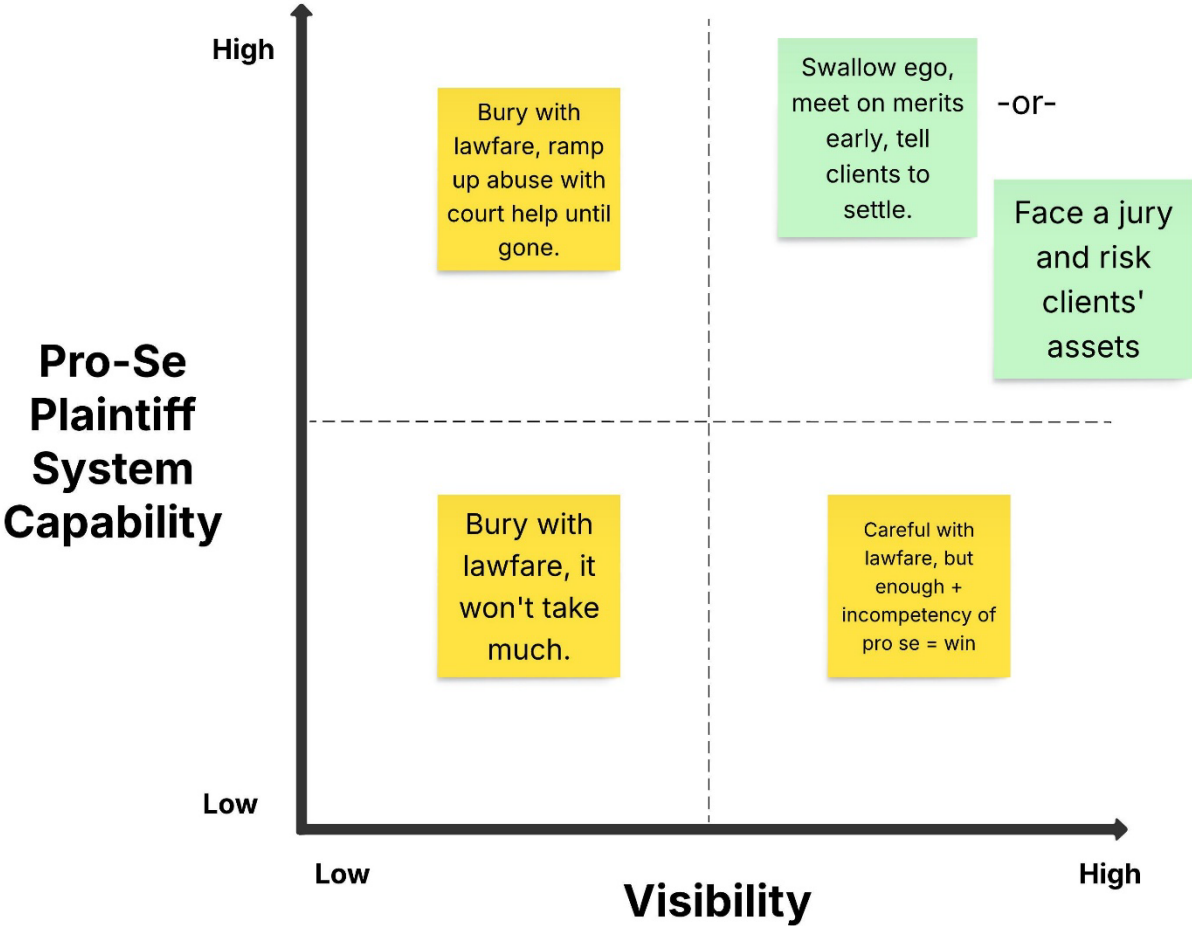


EXHIBIT F

ROCKET VETERINARY RECORDS



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407

Ph 843-427-3355
Email info@pawmedvet.com

CLINICAL SUMMARY	
Animal No.	103957
Clinical No.	303499
Record Date	06-16-2026
Attending Vet(s)	Caroline Conrad DVM
Printed At	07-25-2026
Printed By	Amy EuDaly

Dear Chris,

Below is the medical history for Rocket McNeil.

Thank you very much for choosing PawMED Charleston. Please do not hesitate to get in contact with any questions or concerns regarding Rocket's care.

Sincerely,

Caroline Conrad DVM DVM
PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
843-427-3355

Client Details

Name	McNeil, Chris	Phone	(843) 818-3495
Address	480 Parkdale Drive West Ashley Charleston, South Carolina, 29414		

Patient Details

Name	Rocket	Age	14 years
Species	Canine (Dog)	Deceased	Deceased (06-17-2026)
Breed	Mix	Date	
Color	Tan & White	Sex	Male Neutered
		Microchip	
		Referral	Hampton Park Veterinary

Presenting Problem

- In Pain/Discomfort

Mobility issues, rear leg pain

Subjective

06-16-2026 7:55:24pm, Caroline Conrad DVM

**Rocket, a 14 years Male Neutered Carolina Dog , presented to PawMED Veterinary Urgent Care for evaluation of progressive hind limb weakness that acutely worsened. Yesterday morning while on a walk, his leg reportedly went straight out, and he panicked. The owners report a chronic history of significant muscle wasting in the hind legs, crossing his back legs when walking, and knuckling on the rear left paw. He also has a long-standing history of urinary incontinence which has worsened to the point of needing diapers. The patient is also reported to be mostly or completely blind. For the past few days, his appetite has been decreased, and he has had associated weight loss. His stool has recently become soft, which the owners believe is due to a recent diet change. He is not on any daily medications but receives Gabapentin intermittently. He previously received Adequan injections for his hips but they were discontinued. The owners are aware that he has severe dental disease.



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Fax:
Email: info@pawmedvet.com

Historical Medical Problems: Yes: Hx of urinary incontinence (O has had about 7 years, has never been able to control it), Generalized weakness in hind limbs w/ severe muscle wasting, blind. Has used Librela in the past, Chronic dental disease

Coughing: None

Sneezing: None

Vomiting: None

Diarrhea: Yes: Not full diarrhea, soft formed stool

Urination: Normal for him-urinary incontinence

Drinking: Overall decrease

Appetite: Decreased- not super interested in food the last few days, O finally got him to eat some eggs this evening

Pet's diet/amount fed: Wet food, bland home cooked foods

Any table scraps, treats or human food being given: Yes: Scrambled eggs

Any foreign material ingestion (toys, non-food items, clothing, etc.): No

Any changes in diet recently: Yes: O just recently switched to a different type of wet food.

Environment: Indoor only, outside time heavily supervised

Any recent boarding or contact with other animals: Other: (1) other dog, healthy

Activity Level: Decreased due to mobility struggles

Vaccination Status: Not Current

Parasite Prevention Status (FT and HW): Not Current

Current Preventives Given: Has been off of HWP for about a year

Current Medications: None, Occ gabapentin but it significantly knocks him out

Travel History (ever traveled outside of South Carolina): None

Previous Medical History: Hx of urinary incontinence (lifetime), Blind, Generalized hind limb weakness, used to be on Librela, chronic dental disease.

Objective

06-16-2026 8:07:06pm, Caroline Conrad DVM

EENT: no ocular/nasal discharge; OU corneal pigment and discoloration; AU clean/pink, no debris; no oral lesions, tartar severe, no active swelling

Heart: no murmur; no arrhythmia; pulses strong/synchronous

Respiratory: no crackles/wheezes; no dyspnea; no dullness

PLN: wnl

M/S: ambulatory q4 limbs; diffuse muscle atrophy, hindlimb ataxia; no limb or joint edema, uncomfortable in hips and stifles

Abdomen: soft/nonpainful; no fluid wave; no organomegaly

Skin: no ectoparasites, no wounds; no petechiation

Neuro: BAR, blind, no back or neck pain elicited on palpation, CP deficits hindlimb with mild ataxia, no cross over, superficial pain and motor present; normal anal tone, normal tail motor and pain sensation

U/G: grossly normal

Rectal: not performed

Assessments

06-16-2026 8:07:20pm, Caroline Conrad DVM

Lameness- R/o orthopedic (CCL tear-partial vs full, luxation/subluxation, bursitis, fracture) vs soft tissue vs neurologic (IVDD, FCE/CVA, meningitis) vs IMPA vs tick borne vs neoplasia vs other

hx blind

hx severe dental disease

weight loss

hx urinary incontinence

azotemia (suspect CHF)- r/o infectious, stones, other



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Plans

06-16-2026 9:12:12pm, Caroline Conrad DVM

o opts:

chem limited- azotemia

pcv/ts 44%

4dx; neg x 4

gabapentin 200mg x 5 days here, o/s rx for 15 days

chi on wheels follow up

o/s rx trio

o/s rx renal royal canin, purina NF

o declines;

full rads

full bw

client coms

Discussed with the owner findings on exam; discussed various causes for lameness/ataxia; discussed concerns for FCE, IVDD, DM, paraneoplastic; discussed concerns for weight loss, could be oral pain but also could be metabolic such as CKD/DM or paraneoplastic, went over is still mobile which is great; discussed only way to visualize spinal column would be MRI/CT or CSF tap; went over do not have do this but just giving informatin; rec rads to screen for OA/subluxations/neoplasia, discussed do get radiology report to confirm in case anything missed; discussed limitations of x-rays (no spinal imaging) compared to CT/MRI; o declines
rec bw for nsaid; NSAID pain medication good for swelling and inflammation; does effect kidney and liver so do recommend given age; discussed option for 4dx to screen tick borne causes; o approves both; discussed option for full bw to assess organ function and metabolic causes for weight loss; o opts limited for now

Went over results of diagnostics.....discussed next step options; discussed option for outpatient treatment vs referral to neurology; discussed staging kidney disease; discussed BP, u/a ect; o opts to follow up rDVM for kidneys; rec gabapentin for pain control as safer for kidneys, variable dosing; rec try to transition to renal diet; went over varoius rx; o opts for o/s rx for RC and Purina canned foods to try; approves gabapentin; requests rx for trio; went over risks of paralysis; went over uremic ulcer,s hypertension ect; warned renal dysfunction is life long, managed not cured; went over progression; rec acupuncture for alternative pain control, rec Chi on Wheels for mobile or Saddleback Mobile; emphasized to owner if worse at any point recheck with a veterinarian, if weekend/after hours seek ER care, emphasized recheck with rDVM as directed
Owner understands all risks and limitations of empirical treatment plan and approves all

Therapeutic / Procedure

06-16-2026 7:00:00pm, Caroline Conrad DVM
Urgent Care - Physical Exam
Specifics

Invoiced 403732

06-16-2026 7:00:00pm, Caroline Conrad DVM
Biohazard and Medical Waste Fee
Specifics

Invoiced 403732

Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
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PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

06-16-2026 9:56:15pm	RX Purina EN Canned (13.4oz Can)	1	FEED AS DIRECTED FOR MANUFACTURER	Caroline Conrad DVM
06-16-2026 9:55:00pm	RX Royal Canin Veterinary Diet GI Kit (RCVD)	1	ROYAL CANIN VETERINARY DIET, RENAL CANNED ANY FLAVOR	Caroline Conrad DVM
06-16-2026 9:27:30pm	RX Ivermectin/Pyrantel (Heartgard Plus 26-50lbs) 136mcg/114mg Chewable Tablet	1	SIMPARICA TRIO 22-44LBS: GIVE 1 TABLET BY MOUTH EVERY 30 DAYS FOR FLEA/TICK/HEARTWORM PREVENTION	Caroline Conrad DVM
06-16-2026 9:26:48pm	RX Gabapentin 100mg Capsule	90	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 15 DAYS. MAY CAUSE SEDATION.	Caroline Conrad DVM
06-16-2026 9:24:54pm	RX Gabapentin 100mg Capsule	30	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 5-7 DAYS. MAY CAUSE SEDATION.	Caroline Conrad DVM

Discharge Summaries

06-16-2026 10:00:28pm

06-16-2026

Dear Chris,

Rocket McNeil is being discharged from our hospital today after being seen for In Pain/Discomfort.

Rocket was a great patient today - please find a summary of their case and discharge instructions below.

Discharge Instructions:

06-16-2026 9:49:59pm:

Case Summary

Rocket was presented to pawMED for evaluation of lameness/hindlimb weakness, weight loss, and appetite changes.

On exam he had hindlimb ataxia and conscious proprioceptive deficits but had present motor and pain sensation. He had diffuse muscle atrophy and significant dental disease.

We ran bloodwork which came back with azotemia or kidney failure, it did rule out heartworm disease, and he has no signs of anemia. We discussed the option for x-rays for his kidneys/spine/hindlimbs to look for stones and orthopedic causes. At this time you opted to start treating for neurological pain, try to get him to eat a renal diet, and follow up with a full service general practice and veterinary acupuncturist.

He should have his kidney disease staged and managed with his family general practice veterinarian (see below about staging). Ideally he should eat a canned prescription diet for kidney support

Chi on Wheels is great option for mobile veterinary acupuncture or herbs. Dr. Luke is a mobile rehab veterinarian that could work with you to strengthen his hindlimbs as well.

We are sending home gabapentin for discomfort and outside scripts to continue if it helps. He also got an injection of B12 which may help or not. His urine may be light pink for 24 hours from the B12.

Lameness



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Diseases such as trauma, fibrocartilaginous emboli (FCE), meningitis, inflammatory disease, infection, and cancer can mimic the symptoms of disc herniation. Several tests can be performed to determine the underlying cause of pain or paralysis. Diagnostic spinal imaging techniques used to diagnose disc herniation include radiography (xray), myelogram, CT scan, or MRI.

At-Home Care Instructions hindlimb

- Strict activity restriction for 2-3 weeks: crate rest as directed. Use a harness and sling if needed.
- Assist with going to the bathroom; prevent slipping on floors.
- Follow any physical therapy or passive range-of-motion exercises prescribed.
- Use an e-collar to prevent licking/chewing if there are incisions or sores.

Monitoring at Home

- Pain level: reluctance to move, crying, tense abdomen, hunched back.
- Neurologic status: paw knuckling, wobbliness, weakness, or inability to walk.
- Urination/defecation ability; report incontinence or urine retention.
- Seek emergency care if paralysis worsens, deep pain is lost, or Rocket cannot urinate.

Disease Information - Kidney Disease

The kidney is an amazing organ. It is designed to do a lot more than just make urine and get rid of toxins. It also manages hydration, blood pressure, red blood cell production, pH balance in the blood, calcium, and phosphorus balance, and more. Kidneys are made up of millions of filtration units called "nephrons" and we are born with vastly more nephrons than we need to keep healthy. Over time and age, however, nephrons get damaged through the wear and tear of living and they die off. We only need enough nephrons to fill up about 1/3 of one kidney to manage normal kidney function. In patients with kidney disease- typically 60-75% of the kidneys have already lost function at the time of diagnosis.

STAGING KIDNEY DISEASE

Stage I is mostly for pets that are known to have kidney disease based on abnormal ultrasound or their slightly elevated blood values. We check their blood pressure and urinary protein levels, and screen for urinary tract infections. If abnormalities are found, they are usually checked quarterly for any sign of progression.

Stage 2 is where diet change to a renal diet is typically recommended with the idea being that the earlier this is started, the more likely the pet will accept it. Medications may become needed in this stage

In Stage 3, the patient is likely to be showing some symptoms such as reduced appetite or occasional nausea. Medications may be needed more often, even daily.

In Stage 4, the patient is almost certainly showing symptoms and it becomes important to be sure the patient is eating enough calories to maintain a healthy weight. Fluid support at home is a good idea. This may mean adding water to the food, giving fluids under the skin (subcutaneous fluids), or sometimes even a stint of hospitalization and IV fluids to drive the elevated kidney values down.

At-Monitoring and Care Instructions:

Please monitor Rocket for:

- vomiting
- diarrhea
- decreased appetite - especially if refuses ALL food for more than 24-48 hours
- lethargy/worsening activity level
- depressed and worsening attitude
- or other concerns.

Please call or have Rocket re-evaluated immediately if these or other symptoms arise.

Follow up:

Rocket needs to be re-evaluated by a veterinarian in 1-3 days for further work up. Urine and blood pressure testing may also be performed at that time. It is ok to follow up with your primary care provider if they have availability - we will be providing them detailed



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records from today's visit. Should they be unable to see Rocket within that time frame, we'd also be happy to see Rocket back for this visit.

06-16-2026 9:50:17pm:

MEDICATIONS TO GO HOME:

Please READ THE LABEL CAREFULLY and ensure that all medication is administered as instructed. If you are experiencing any difficulty in dosing your pet please contact us for advice.

These discharge instructions may have additional information that is not included on the label of your medication.

Date/Time	Drug Name	Quantity	Instructions
06-16-2026 9:56:15pm	RX Purina NF Canned (13.4oz Can)	1	FEED AS DIRECTED FOR MANUFACTURER
06-16-2026 9:55:00pm	RX Royal Canin Veterinary Diet Renal Canned	1	ROYAL CANIN VETERINARY DIET, RENAL CANNED ANY FLAVOR, FEED AS DIRECTED FOR MANUFACTURER
06-16-2026 9:27:30pm	SIMPARICA TRIO 22-44LBS	1	: GIVE 1 TABLET BY MOUTH EVERY 30 DAYS FOR FLEA/TICK/HEARTWORM PREVENTION
06-16-2026 9:26:48pm	RX Gabapentin 100mg Capsule	90	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 15 DAYS. MAY CAUSE SEDATION.
06-16-2026 9:24:54pm	RX Gabapentin 100mg Capsule	30	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 5-7 DAYS. MAY CAUSE SEDATION.

Omeprazole or Famotidine: 20mg by mouth 1-2 times a day for GI upset. Purchase over the counter and start tonight. Use as needed.

MEDICATIONS WARNINGS:

Gabapentin takes 2 hours to see effects, dose him based on his response. If 2 capsules is too much or causes too deep of sedation, reduce to 1 capsule.

Fill the prescription for gabapentin at the pharmacy of your choice if he responds well to this short course we sent home

PROCEDURES/THERAPEUTICS:

Urgent Care - Physical Exam, Biohazard and Medical Waste Fee

DIAGNOSTIC RESULTS:

Date	Vet	Lab Reference	Supplier			
06-16-2026	Caroline Conrad DVM	US4571-DR4242	Heska			
Test	Results	Unit	Lowest Value	Highest Value	Qualifier	
BUN	70.9	mg/dl	9.0	29.0		
CRE	2.5	mg/dl	0.4	1.4		
IP	5.5	mg/dl	1.9	5.0		
Ca	10.1	mg/dl	9.0	12.2		
TP	6.8	g/dl	5.5	7.6		
ALB	3.1	g/dl	2.5	4.0		
GLOB	3.7	g/dl	2.0	3.6		
GLU	121	mg/dl	75	125		
TCHO	328	mg/dl	120	310		
ALT	87	U/l	0	120		
ALP	80	U/l	0	140		
GGT	< 10	U/l	0	14		



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TBIL	0.1	mg/dl	0.0	0.5
Na	142	mEq/l	141	152
K	4.1	mEq/l	3.8	5.3
Cl	107	mEq/l	102	120
NaKRatio	35			
06-16-2026	Caroline Conrad DVM	US4571-DR4243	In House Diagnostics	
06-16-2026	Caroline Conrad DVM	US4571-DR4244	In House Diagnostics	

MONITORING:

Please monitor Rocket at home closely for the next 48 - 72 hours. They should be monitored for:

- Vomiting
- Diarrhea
- Decreased appetite/anorexia
- Increased lethargy
- Increased respiratory rate, pattern, or effort
- Trouble walking/getting around
- Change in behavior
- Non-responsiveness

If Rocket was discharged with a bandage, please remove the bandage in 1 hour.

I have read these discharges and do not have any questions regarding the continued care of my pet.



Please note that medication refills may take up to 48 hours.

Thank you for trusting us with Rocket's care, he has been a wonderful patient. Please be sure to contact us immediately if you suspect he is not improving as expected at home. If you should have any questions or concerns, please do not hesitate to call.

Sincerely,
Caroline Conrad DVM, DVM

Vet Communication

06-16-2026 10:08:00pm, info@hamptonparkvet.com

PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Please find attached the clinical summary for Rocket

Rocket is being referred by Caroline Conrad DVM. This report has been generated to provide you with the medical information required for you to continue with your assessment for this patient.

Additional Patient Information for Rocket McNeil



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Master Problems:

Presenting Problems: In Pain/Discomfort

Urgency:

Please contact us using the details provided in this email if you require more information.

Caroline Conrad DVM

PawMED Charleston

Animal Medical West

704 Orleans Road
Charleston, SC 29407
(843) 766-7387

Patient Chart

Printed: 08-15-22 at 10:49a

CLIENT INFORMATION

Name	Meaghan Poyer (17764)	Spouse	McNeil,Chris
Address	181 Gordon Street Charleston, SC 29403		
Phone	843 793-9863		

PATIENT INFORMATION

Name	Rocket	Species	Canine
Sex	Male, Neutered	Breed	Canine, Mixed Breed Mix
Birthday	06-06-12	Age	10y
ID		Rabies	21-1574-1
Color	Tri Color	Weight	55.60 lbs
Reminded	(none)	Codes	

Reminders for: Rocket	Last done
07/22 Dog DHLPPV Annual	07-27-21
07/22 Yearly Exam	07-27-21
07/22 Fecal ova & parasites by zinc s	07-27-21
07/22 4DX HW & Blood Parasite Screen	07-27-21
07/22 Rabies 1 year	07-27-21
07/22 Bordatella Intra-Trac 3 ADT	07-27-21
07/22 Simparica Trio Green 44.1-88#	06-10-22

HEALTH HISTORY SUMMARY

Date	Diagnosis
06-05-19	Gastroenteritis

PROBLEMS:	Opened	By	Problem description	Closed	By
	06-05-19	MC	Diarrhea		
	06-05-19	MC	Vomiting		
	06-07-19	MC	Recheck		
	06-28-19	MC	Vaccine update		
	07-27-21	MC	Vaccine update		

Rocket's weight history (in lbs)

07-27-21	55.60
02-17-20	59.60
06-28-19	61.00
06-07-19	62.60
06-05-19	61.80

MEDICAL HISTORY

Date	By	Code	Description	Qty (Variance)
07-05-22	MC2	FNOTE\$	By: KH, Simparica Trio Green 44.1-88#	

**Hampton Park Veterinary Hospital**

627-A Rutledge Ave
Charleston, SC 29403-4405
P: (843) 874-0400
info@hamptonparkvet.com
www.hamptonparkvet.com

BASIC SOAP (10/18/2025)

Patient Information



Name:	Rocket
Status:	Deceased (06/17/2026)
Breed (Species):	Carolina Dog (Canine)
Age (Birthday):	13 years 10 months (08/11/2012)
Sex:	Male (neutered)
Color:	black & tan
Chip:	982000364000551
Weight:	47.6 lbs (21.59 kg)

Owner Information

<u>Name</u>	<u>Address</u>	<u>Mobile</u>	<u>Home</u>	<u>Email</u>
Chris McNeil	480-A Parkdale Drive, Charleston, SC 29414	843-818-3495	843-793-9863	mcneilandpoyer@gmail.com

Visit Information

Visit Date:	10/18/2025
Complaint:	cysto for UA and culture. exam not required
Provider:	James Baxter, DVM

Subjective

History:

Notes: Pt is presenting for: Cysto for U/A w Culture
E/D: e/d normal
U/D: u/d normal
C/S/V/D: none
Diet: Urinary food + additional human food and wet food
Prevention: Trio
Current Medications: None
Known Allergies or Medical Conditions: None

Other questions and/or concerns: O mentioned poss mouth pain and would like to potentially have a plan to address in the near future
-CN

Objective

Vital Signs:

Weight: 47.6 Lbs.

Temperature: not obtained

Heartrate: 130 bpm.

Respiration: 25 rpm. pant

Labs + Diagnostics:

Assessment

Notes: Urinary issues

Grade 4/4 periodontal disease

Plan

Notes: Cystocentesis for sterile urine sample: submitted for UA / Urine Culture

Discussed dental with owner (will eval with Dr. P next week)

Client Communication

Notes: cn went over Dental Treatment Plan w O, relayed that o has 45 days following last bloodwork otherwise would have to repeat pre-anesthetic bloodwork and O was fine with that. Explained extraction costs. O will be more than likely coming back to repeat at a later time but will have to wait until after litigation.

Medical Records

10/22/2025



56 Unit(s) of AMOXICILLIN CLAVULANATE 125MG TABS.

Antibiotic. Give 2 tablets by TWICE daily for 14 days. GIVE WITH FOOD to avoid GI upset. -JJW

Lot #: KP1225004A

Manufacturer: Cronus

Expiration: 02/28/2027

10/18/2025



1 Unit(s) of cystocentesis.



1 Unit(s) of Office Visit - Medical Team.



1 Unit(s) of Your Nurse today was Cody.



Items: Urinalysis with Urine Culture

Ordered: 10/18/2025

Received: 10/22/2025

Source: IDEXX

Results: Chemistry

Name

Result

Reference range

IDEXX Cystatin B (Urine)

378 *

0-99 ng/mL

HIGH



In a patient that presented unwell, a result that is ≥ 100 ng/mL indicates that active kidney injury may be present. If an insult that may have caused kidney injury is suspected, consider additional diagnostics such as imaging, urine protein: creatinine ratio and urine culture with susceptibility. If patient presented well and kidney injury is not suspected, subclinical injury cannot be ruled out. A comprehensive history including diet, supplements, preventives, travel, etc. should be obtained. Consider rechecking Cystatin B and renal functional markers in 1-2 weeks. If Cystatin B remains elevated, additional diagnostics are recommended. Note: Dehydration, subclinical illness and certain medications (e.g., NSAIDs) may contribute to kidney injury. Consider the risk/benefit of such medications in the overall management of the patient. For more information on Cystatin B, visit idexx.com/cystatinb.

Results: Urinalysis

<u>Name</u>	<u>Result</u>	<u>Reference range</u>	
Collection	CYSTOCENTESIS		
Color	STRAW		
Clarity	CLOUDY		
Specific Gravity	1.018 *	1.030-1.098	
	Potentially inappropriate concentration. Consider hydration status and, if persistent and inappropriate, renal disease, endocrinopathies, and medications.		
pH	6.0	6.0-7.5	
Urine Protein	1+ *		
Glucose	NEGATIVE		
Ketones	NEGATIVE		
Blood / Hemoglobin	3+ *		
Bilirubin	NEGATIVE		
Urobilinogen	NORMAL		
White Blood Cells	100 *	HPF	
Red Blood Cells	50-75 *	HPF	
Bacteria	MARKED RODS >40/HPF *		
	If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria .		

Epithelial Cells	RARE (0-1)
Mucus	NONE SEEN
Casts	NONE SEEN
Crystals	NONE SEEN

Results: Microbiology

<u>Name</u>	<u>Result</u>	<u>Reference range</u>
Source:	CYSTOCENTESIS	

Culture Results: Status: FINAL Isolate 1: Klebsiella pneumoniae - >100,000 CFU per ml Isolate 2: Serratia marcescens - 10,000 - 50,000 CFU per ml This isolate is considered an environmental or commensal organism, unlikely to be pathogenic in urine. Therefore, susceptibility testing was not performed. Isolate 1 MIC Amoxicillin R >=32 Amoxicillin-Clavulanic Acid S <=2 Cephalexin S <=4 Cefpodoxime S <=0.25 Cefovecin S 1 Ceftazidime S <=0.12 Ceftiofur S <=1 Imipenem / Carbapenem S 0.5 Amikacin S <=2 Gentamicin S <=1 Ciprofloxacin S <=0.06 Enrofloxacin S <=0.12 Marbofloxacin S <=0.5 Doxycycline S 1 Nitrofurantoin I 64 Chloramphenicol S 4 Trimethoprim/Sulfamethoxazole S <=20 Cefotaxime S **INTERPRETATION KEY for Antibiotic Susceptibility Results (when performed)** S = Sensitive. Organism is inhibited by usual recommended dose. I = Intermediate. Organism is inhibited only by the maximum recommended dose. R = Resistant. Organism is resistant to the maximum recommended dose. These standards have been established by the Clinical and Laboratory Standards Institute (CLSI). TF = To Follow. Susceptibility testing for this antibiotic is performed by Kirby-Bauer and results will follow shortly. N/I (not indicated) will be reported and/or MIC data may be left blank and not reported if: a) the growth requirements of the organism require the sensitivity testing to be performed by another method b) interpretive criteria are not available from CLSI (in this case, recommended antibiotics will be reported based on clinical efficacy studies) c) certain antibiotics are not available due to limitations of our commercial laboratory system d) the drug is known to be clinically ineffective against the organism regardless of in vitro results For all sources and sites, susceptibilities are reported based on canine/feline MIC breakpoints where available. For more information on Minimum Inhibitory Concentration (MIC) please see the "Microbiology Guide to Interpreting Minimum Inhibitory Concentration (MIC)" section of the IDEXX Reference Laboratories Directory of Services or visit www.idexx.com/MIC.

 **ROCKET MCNEIL**

PET OWNER: **MCNEIL**

SPECIES: Canine

BREED: Carolina Dog

GENDER: Male Neutered

AGE: 13 Years

PATIENT ID: 1017

HAMPTON PARK VETERINARY

627 RUTLEDGE AVE. STE A

CHARLESTON, SC 29403

845-541-7719

ACCOUNT #: 102054

ATTENDING VET: Alexandria Pierce, DVM

LAB ID: 4510482486

ORDER ID: 295376181

COLLECTION DATE: **10/18/25**

DATE OF RECEIPT: **10/19/25**

DATE OF RESULT: **10/22/25**

IDEXX Services: Urinalysis with IDEXX Cystatin B Test and Urine Culture*

Chemistry



10/19/25 (Order Received)

10/22/25 9:44 AM (Last Updated)

TEST

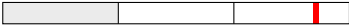
RESULT

REFERENCE VALUE

IDEXX Cystatin B (Urine)

^a **378**

0 - 99 ng/mL

H 

< 50

^a

In a patient that presented unwell, a result that is ≥ 100 ng/mL indicates that active kidney injury may be present. If an insult that may have caused kidney injury is suspected, consider additional diagnostics such as imaging, urine protein: creatinine ratio and urine culture with susceptibility. If patient presented well and kidney injury is not suspected, subclinical injury cannot be ruled out. A comprehensive history including diet, supplements, preventives, travel, etc. should be obtained. Consider rechecking Cystatin B and renal functional markers in 1-2 weeks. If Cystatin B remains elevated, additional diagnostics are recommended. Note: Dehydration, subclinical illness and certain medications (e.g., NSAIDS) may contribute to kidney injury. Consider the risk/benefit of such medications in the overall management of the patient. For more information on Cystatin B, visit [idexx.com/cystatinb](https://www.idexx.com/cystatinb).



12/8/23

Urinalysis



10/19/25 (Order Received)

10/22/25 9:44 AM (Last Updated)

TEST

RESULT

REFERENCE VALUE

Collection

CYSTOCENTESIS

FREECATCH

CYSTOCE...

Color

STRAW

Yellow

STRAW

Clarity

CLOUDY

TURBID

TURBID

Specific Gravity

^a **1.018**

1.030 - 1.098

L 

1.015

1.012

pH

6.0

6.0 - 7.5



6.0

6.5

Urine Protein

1+

1+

TRACE

Glucose

NEGATIVE

NEGATIVE

NEGATIVE

Ketones

NEGATIVE

NEGATIVE

NEGATIVE



10/10/25



12/8/23



ROCKET MCNEIL

PET OWNER: MCNEIL

DATE OF RESULT: 10/22/25

LAB ID: 4510482486

Urinalysis (continued)

TEST	RESULT	REFERENCE VALUE		
Blood / Hemoglobin	3+		1+	1+
Bilirubin	NEGATIVE		NEGATIVE	NEGATIVE
Urobilinogen	NORMAL		NORMAL	NORMAL
White Blood Cells	> 100	HPF	75-100	0-2
Red Blood Cells	50-75	HPF	2-5	15-20
Bacteria	^b MARKED RODS >40/HPF		MARKED...	NONE SEEN
Epithelial Cells	RARE (0-1)		RARE (0-1)	RARE (0-1)
Mucus	NONE SEEN		NONE SEEN	NONE SEEN
Casts	NONE SEEN		NONE SEEN	NONE SEEN
Crystals	NONE SEEN		NONE SEEN	4+ AMMONI...

^a Potentially inappropriate concentration. Consider hydration status and, if persistent and inappropriate, renal disease, endocrinopathies, and medications.

^b If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria.

Microbiology



10/19/25 (Order Received)
10/22/25 9:44 AM (Last Updated)

Source: CYSTOCENTESIS

Culture Results: Status: FINAL

Isolate 1: *Klebsiella pneumoniae* - >100,000 CFU per ml

Isolate 2: *Serratia marcescens* - 10,000 - 50,000 CFU per ml

This isolate is considered an environmental or commensal organism, unlikely to be pathogenic in urine. Therefore, susceptibility testing was not performed.



ROCKET MCNEIL

PET OWNER: MCNEIL

DATE OF RESULT: 10/22/25

LAB ID: 4510482486

Microbiology (continued)

	Isolate 1	MIC
Amoxicillin	R	>=32
Amoxicillin-Clavulanic Acid	S	<=2
Cephalexin	S	<=4
Cefpodoxime	S	<=0.25
Cefovecin	S	1
Ceftazidime	S	<=0.12
Ceftiofur	S	<=1
Imipenem / Carbapenem	S	0.5
Amikacin	S	<=2
Gentamicin	S	<=1
Ciprofloxacin	S	<=0.06
Enrofloxacin	S	<=0.12
Marbofloxacin	S	<=0.5
Doxycycline	S	1
Nitrofurantoin	I	64
Chloramphenicol	S	4
Trimethoprim/Sulfamethoxazole	S	<=20
Cefotaxime	S	

INTERPRETATION KEY for Antibiotic Susceptibility Results (when performed)

S = Sensitive. Organism is inhibited by usual recommended dose.

I = Intermediate. Organism is inhibited only by the maximum recommended dose.

R = Resistant. Organism is resistant to the maximum recommended dose.

These standards have been established by the Clinical and Laboratory Standards Institute (CLSI).

TF = To Follow. Susceptibility testing for this antibiotic is performed by Kirby-Bauer and results will follow shortly.

N/I (not indicated) will be reported and/or MIC data may be left blank and not reported if:

- a) the growth requirements of the organism require the sensitivity testing to be performed by another method
- b) interpretive criteria are not available from CLSI (in this case, recommended antibiotics will be reported based on clinical efficacy studies)
- c) certain antibiotics are not available due to limitations of our commercial laboratory system
- d) the drug is known to be clinically ineffective against the organism regardless of in vitro results

For all sources and sites, susceptibilities are reported based on canine/feline MIC breakpoints where available.

For more information on Minimum Inhibitory Concentration (MIC) please see the "Microbiology Guide to Interpreting Minimum Inhibitory Concentration (MIC)" section of the IDEXX Reference Laboratories Directory of Services or visit www.idexx.com/MIC.



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407

Ph 843-427-3355
Email info@pawmedvet.com

CLINICAL SUMMARY	
Animal No.	103957
Clinical No.	303499
Record Date	06-16-2026
Attending Vet(s)	Caroline Conrad DVM
Printed At	07-25-2026
Printed By	Amy EuDaly

Dear Chris,

Below is the medical history for Rocket McNeil.

Thank you very much for choosing PawMED Charleston. Please do not hesitate to get in contact with any questions or concerns regarding Rocket's care.

Sincerely,

Caroline Conrad DVM DVM
PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
843-427-3355

Client Details

Name	McNeil, Chris	Phone	(843) 818-3495
Address	480 Parkdale Drive West Ashley Charleston, South Carolina, 29414		

Patient Details

Name	Rocket	Age	14 years
Species	Canine (Dog)	Deceased	Deceased (06-17-2026)
Breed	Mix	Date	
Color	Tan & White	Sex	Male Neutered
		Microchip	
		Referral	Hampton Park Veterinary

Presenting Problem

- In Pain/Discomfort

Mobility issues, rear leg pain

Subjective

06-16-2026 7:55:24pm, Caroline Conrad DVM

**Rocket, a 14 years Male Neutered Carolina Dog , presented to PawMED Veterinary Urgent Care for evaluation of progressive hind limb weakness that acutely worsened. Yesterday morning while on a walk, his leg reportedly went straight out, and he panicked. The owners report a chronic history of significant muscle wasting in the hind legs, crossing his back legs when walking, and knuckling on the rear left paw. He also has a long-standing history of urinary incontinence which has worsened to the point of needing diapers. The patient is also reported to be mostly or completely blind. For the past few days, his appetite has been decreased, and he has had associated weight loss. His stool has recently become soft, which the owners believe is due to a recent diet change. He is not on any daily medications but receives Gabapentin intermittently. He previously received Adequan injections for his hips but they were discontinued. The owners are aware that he has severe dental disease.



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Historical Medical Problems: Yes: Hx of urinary incontinence (O has had about 7 years, has never been able to control it), Generalized weakness in hind limbs w/ severe muscle wasting, blind. Has used Librela in the past, Chronic dental disease

Coughing: None

Sneezing: None

Vomiting: None

Diarrhea: Yes: Not full diarrhea, soft formed stool

Urination: Normal for him-urinary incontinence

Drinking: Overall decrease

Appetite: Decreased- not super interested in food the last few days, O finally got him to eat some eggs this evening

Pet's diet/amount fed: Wet food, bland home cooked foods

Any table scraps, treats or human food being given: Yes: Scrambled eggs

Any foreign material ingestion (toys, non-food items, clothing, etc.): No

Any changes in diet recently: Yes: O just recently switched to a different type of wet food.

Environment: Indoor only, outside time heavily supervised

Any recent boarding or contact with other animals: Other: (1) other dog, healthy

Activity Level: Decreased due to mobility struggles

Vaccination Status: Not Current

Parasite Prevention Status (FT and HW): Not Current

Current Preventives Given: Has been off of HWP for about a year

Current Medications: None, Occ gabapentin but it significantly knocks him out

Travel History (ever traveled outside of South Carolina): None

Previous Medical History: Hx of urinary incontinence (lifetime), Blind, Generalized hind limb weakness, used to be on Librela, chronic dental disease.

Objective

06-16-2026 8:07:06pm, Caroline Conrad DVM

EENT: no ocular/nasal discharge; OU corneal pigment and discoloration; AU clean/pink, no debris; no oral lesions, tartar severe, no active swelling

Heart: no murmur; no arrhythmia; pulses strong/synchronous

Respiratory: no crackles/wheezes; no dyspnea; no dullness

PLN: wnl

M/S: ambulatory q4 limbs; diffuse muscle atrophy, hindlimb ataxia; no limb or joint edema, uncomfortable in hips and stifles

Abdomen: soft/nonpainful; no fluid wave; no organomegaly

Skin: no ectoparasites, no wounds; no petechiation

Neuro: BAR, blind, no back or neck pain elicited on palpation, CP deficits hindlimb with mild ataxia, no cross over, superficial pain and motor present; normal anal tone, normal tail motor and pain sensation

U/G: grossly normal

Rectal: not performed

Assessments

06-16-2026 8:07:20pm, Caroline Conrad DVM

Lameness- R/o orthopedic (CCL tear-partial vs full, luxation/subluxation, bursitis, fracture) vs soft tissue vs neurologic (IVDD, FCE/CVA, meningitis) vs IMPA vs tick borne vs neoplasia vs other

hx blind

hx severe dental disease

weight loss

hx urinary incontinence

azotemia (suspect CHF)- r/o infectious, stones, other



PawMED Charleston
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B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Plans

06-16-2026 9:12:12pm, Caroline Conrad DVM

o opts:
chem limited- azotemia
pcv/ts 44%
4dx; neg x 4
gabapentin 200mg x 5 days here, o/s rx for 15 days
chi on wheels follow up
o/s rx trio
o/s rx renal royal canin, purina NF

o declines;
full rads
full bw

client coms

Discussed with the owner findings on exam; discussed various causes for lameness/ataxia; discussed concerns for FCE, IVDD, DM, paraneoplastic; discussed concerns for weight loss, could be oral pain but also could be metabolic such as CKD/DM or paraneoplastic, went over is still mobile which is great; discussed only way to visualize spinal column would be MRI/CT or CSF tap; went over do not have do this but just giving informatin; rec rads to screen for OA/subluxations/neoplasia, discussed do get radiology report to confirm in case anything missed; discussed limitations of x-rays (no spinal imaging) compared to CT/MRI; o declines
rec bw for nsaid; NSAID pain medication good for swelling and inflammation; does effect kidney and liver so do recommend given age; discussed option for 4dx to screen tick borne causes; o approves both; discussed option for full bw to assess organ function and metabolic causes for weight loss; o opts limited for now

Went over results of diagnostics.....discussed next step options; discussed option for outpatient treatment vs referral to neurology; discussed staging kidney disease; discussed BP, u/a ect; o opts to follow up rDVM for kidneys; rec gabapentin for pain control as safer for kidneys, variable dosing; rec try to transition to renal diet; went over varoius rx; o opts for o/s rx for RC and Purina canned foods to try; approves gabapentin; requests rx for trio; went over risks of paralysis; went over uremic ulcer,s hypertension ect; warned renal dysfunction is life long, managed not cured; went over progression; rec acupuncture for alternative pain control, rec Chi on Wheels for mobile or Saddleback Mobile; emphasized to owner if worse at any point recheck with a veterinarian, if weekend/after hours seek ER care, emphasized recheck with rDVM as directed
Owner understands all risks and limitations of empirical treatment plan and approves all

Therapeutic / Procedure

06-16-2026 7:00:00pm, Caroline Conrad DVM
Urgent Care - Physical Exam
Specifics

Invoiced 403732

06-16-2026 7:00:00pm, Caroline Conrad DVM
Biohazard and Medical Waste Fee
Specifics

Invoiced 403732

Medication

Date/Time	Drug Name	Qty	Instructions	Prescribed By
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PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

06-16-2026 9:56:15pm	RX Purina EN Canned (13.4oz Can)	1	FEED AS DIRECTED FOR MANUFACTURER	Caroline Conrad DVM
06-16-2026 9:55:00pm	RX Royal Canin Veterinary Diet GI Kit (RCVD)	1	ROYAL CANIN VETERINARY DIET, RENAL CANNED ANY FLAVOR	Caroline Conrad DVM
06-16-2026 9:27:30pm	RX Ivermectin/Pyrantel (Heartgard Plus 26-50lbs) 136mcg/114mg Chewable Tablet	1	SIMPARICA TRIO 22-44LBS: GIVE 1 TABLET BY MOUTH EVERY 30 DAYS FOR FLEA/TICK/HEARTWORM PREVENTION	Caroline Conrad DVM
06-16-2026 9:26:48pm	RX Gabapentin 100mg Capsule	90	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 15 DAYS. MAY CAUSE SEDATION.	Caroline Conrad DVM
06-16-2026 9:24:54pm	RX Gabapentin 100mg Capsule	30	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 5-7 DAYS. MAY CAUSE SEDATION.	Caroline Conrad DVM

Discharge Summaries

06-16-2026 10:00:28pm

06-16-2026

Dear Chris,

Rocket McNeil is being discharged from our hospital today after being seen for In Pain/Discomfort.

Rocket was a great patient today - please find a summary of their case and discharge instructions below.

Discharge Instructions:

06-16-2026 9:49:59pm:

Case Summary

Rocket was presented to pawMED for evaluation of lameness/hindlimb weakness, weight loss, and appetite changes.

On exam he had hindlimb ataxia and conscious proprioceptive deficits but had present motor and pain sensation. He had diffuse muscle atrophy and significant dental disease.

We ran bloodwork which came back with azotemia or kidney failure, it did rule out heartworm disease, and he has no signs of anemia. We discussed the option for x-rays for his kidneys/spine/hindlimbs to look for stones and orthopedic causes. At this time you opted to start treating for neurological pain, try to get him to eat a renal diet, and follow up with a full service general practice and veterinary acupuncturist.

He should have his kidney disease staged and managed with his family general practice veterinarian (see below about staging). Ideally he should eat a canned prescription diet for kidney support

Chi on Wheels is great option for mobile veterinary acupuncture or herbs. Dr. Luke is a mobile rehab veterinarian that could work with you to strengthen his hindlimbs as well.

We are sending home gabapentin for discomfort and outside scripts to continue if it helps. He also got an injection of B12 which may help or not. His urine may be light pink for 24 hours from the B12.

Lameness



PawMED Charleston
1200 Sam Rittenberg Boulevard
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Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
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Diseases such as trauma, fibrocartilaginous emboli (FCE), meningitis, inflammatory disease, infection, and cancer can mimic the symptoms of disc herniation. Several tests can be performed to determine the underlying cause of pain or paralysis. Diagnostic spinal imaging techniques used to diagnose disc herniation include radiography (xray), myelogram, CT scan, or MRI.

At-Home Care Instructions hindlimb

- Strict activity restriction for 2-3 weeks: crate rest as directed. Use a harness and sling if needed.
- Assist with going to the bathroom; prevent slipping on floors.
- Follow any physical therapy or passive range-of-motion exercises prescribed.
- Use an e-collar to prevent licking/chewing if there are incisions or sores.

Monitoring at Home

- Pain level: reluctance to move, crying, tense abdomen, hunched back.
- Neurologic status: paw knuckling, wobbliness, weakness, or inability to walk.
- Urination/defecation ability; report incontinence or urine retention.
- Seek emergency care if paralysis worsens, deep pain is lost, or Rocket cannot urinate.

Disease Information - Kidney Disease

The kidney is an amazing organ. It is designed to do a lot more than just make urine and get rid of toxins. It also manages hydration, blood pressure, red blood cell production, pH balance in the blood, calcium, and phosphorus balance, and more. Kidneys are made up of millions of filtration units called "nephrons" and we are born with vastly more nephrons than we need to keep healthy. Over time and age, however, nephrons get damaged through the wear and tear of living and they die off. We only need enough nephrons to fill up about 1/3 of one kidney to manage normal kidney function. In patients with kidney disease- typically 60-75% of the kidneys have already lost function at the time of diagnosis.

STAGING KIDNEY DISEASE

Stage I is mostly for pets that are known to have kidney disease based on abnormal ultrasound or their slightly elevated blood values. We check their blood pressure and urinary protein levels, and screen for urinary tract infections. If abnormalities are found, they are usually checked quarterly for any sign of progression.

Stage 2 is where diet change to a renal diet is typically recommended with the idea being that the earlier this is started, the more likely the pet will accept it. Medications may become needed in this stage

In Stage 3, the patient is likely to be showing some symptoms such as reduced appetite or occasional nausea. Medications may be needed more often, even daily.

In Stage 4, the patient is almost certainly showing symptoms and it becomes important to be sure the patient is eating enough calories to maintain a healthy weight. Fluid support at home is a good idea. This may mean adding water to the food, giving fluids under the skin (subcutaneous fluids), or sometimes even a stint of hospitalization and IV fluids to drive the elevated kidney values down.

At-Monitoring and Care Instructions:

Please monitor Rocket for:

- vomiting
- diarrhea
- decreased appetite - especially if refuses ALL food for more than 24-48 hours
- lethargy/worsening activity level
- depressed and worsening attitude
- or other concerns.

Please call or have Rocket re-evaluated immediately if these or other symptoms arise.

Follow up:

Rocket needs to be re-evaluated by a veterinarian in 1-3 days for further work up. Urine and blood pressure testing may also be performed at that time. It is ok to follow up with your primary care provider if they have availability - we will be providing them detailed



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

records from today's visit. Should they be unable to see Rocket within that time frame, we'd also be happy to see Rocket back for this visit.

06-16-2026 9:50:17pm:

MEDICATIONS TO GO HOME:

Please READ THE LABEL CAREFULLY and ensure that all medication is administered as instructed. If you are experiencing any difficulty in dosing your pet please contact us for advice.

These discharge instructions may have additional information that is not included on the label of your medication.

Date/Time	Drug Name	Quantity	Instructions
06-16-2026 9:56:15pm	RX Purina NF Canned (13.4oz Can)	1	FEED AS DIRECTED FOR MANUFACTURER
06-16-2026 9:55:00pm	RX Royal Canin Veterinary Diet Renal Canned	1	ROYAL CANIN VETERINARY DIET, RENAL CANNED ANY FLAVOR, FEED AS DIRECTED FOR MANUFACTURER
06-16-2026 9:27:30pm	SIMPARICA TRIO 22-44LBS	1	: GIVE 1 TABLET BY MOUTH EVERY 30 DAYS FOR FLEA/TICK/HEARTWORM PREVENTION
06-16-2026 9:26:48pm	RX Gabapentin 100mg Capsule	90	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 15 DAYS. MAY CAUSE SEDATION.
06-16-2026 9:24:54pm	RX Gabapentin 100mg Capsule	30	GIVE 2 CAPSULES ORALLY 1-3 TIMES DAILY (EVERY 8 HOURS MAX) FOR UP TO 5-7 DAYS. MAY CAUSE SEDATION.

Omeprazole or Famotidine: 20mg by mouth 1-2 times a day for GI upset. Purchase over the counter and start tonight. Use as needed.

MEDICATIONS WARNINGS:

Gabapentin takes 2 hours to see effects, dose him based on his response. If 2 capsules is too much or causes too deep of sedation, reduce to 1 capsule.

Fill the prescription for gabapentin at the pharmacy of your choice if he responds well to this short course we sent home

PROCEDURES/THERAPEUTICS:

Urgent Care - Physical Exam, Biohazard and Medical Waste Fee

DIAGNOSTIC RESULTS:

Date	Vet	Lab Reference	Supplier			
06-16-2026	Caroline Conrad DVM	US4571-DR4242	Heska			
Test	Results	Unit	Lowest Value	Highest Value	Qualifier	
BUN	70.9	mg/dl	9.0	29.0		
CRE	2.5	mg/dl	0.4	1.4		
IP	5.5	mg/dl	1.9	5.0		
Ca	10.1	mg/dl	9.0	12.2		
TP	6.8	g/dl	5.5	7.6		
ALB	3.1	g/dl	2.5	4.0		
GLOB	3.7	g/dl	2.0	3.6		
GLU	121	mg/dl	75	125		
TCHO	328	mg/dl	120	310		
ALT	87	U/l	0	120		
ALP	80	U/l	0	140		
GGT	< 10	U/l	0	14		



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Fax:
Email: info@pawmedvet.com

TBIL	0.1	mg/dl	0.0	0.5
Na	142	mEq/l	141	152
K	4.1	mEq/l	3.8	5.3
Cl	107	mEq/l	102	120
NaKRatio	35			
06-16-2026	Caroline Conrad DVM	US4571-DR4243	In House Diagnostics	
06-16-2026	Caroline Conrad DVM	US4571-DR4244	In House Diagnostics	

MONITORING:

Please monitor Rocket at home closely for the next 48 - 72 hours. They should be monitored for:

- Vomiting
- Diarrhea
- Decreased appetite/anorexia
- Increased lethargy
- Increased respiratory rate, pattern, or effort
- Trouble walking/getting around
- Change in behavior
- Non-responsiveness

If Rocket was discharged with a bandage, please remove the bandage in 1 hour.

I have read these discharges and do not have any questions regarding the continued care of my pet.



Please note that medication refills may take up to 48 hours.

Thank you for trusting us with Rocket's care, he has been a wonderful patient. Please be sure to contact us immediately if you suspect he is not improving as expected at home. If you should have any questions or concerns, please do not hesitate to call.

Sincerely,
Caroline Conrad DVM, DVM

Vet Communication

06-16-2026 10:08:00pm, info@hamptonparkvet.com

PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Please find attached the clinical summary for Rocket

Rocket is being referred by Caroline Conrad DVM. This report has been generated to provide you with the medical information required for you to continue with your assessment for this patient.

Additional Patient Information for Rocket McNeil



PawMED Charleston
1200 Sam Rittenberg Boulevard
B2
West Ashley
Charleston, South Carolina, 29407
Ph: 843-427-3355
Fax:
Email: info@pawmedvet.com

Master Problems:

Presenting Problems: In Pain/Discomfort

Urgency:

Please contact us using the details provided in this email if you require more information.

Caroline Conrad DVM

PawMED Charleston

EXHIBIT G

DARVO TACTICS AND ADMINISTRATIVE FEDERAL EXPOSURE

The defense alliance continues to utilize administrative staff to execute DARVO (Deny, Attack, Reverse Victim and Offender) maneuvers, as evidenced by recent electronic correspondence from defense staff member Rizzi.

This correspondence demonstrates a continued reliance on deception and the reversal of accountability, ignoring documented timelines in favor of fabricated narratives.

While the state court tolerates such maneuvers, introducing these fraudulent communications into the federal system exposes the involved administrative actors to severe derivative liability, including direct scrutiny under the Federal False Statements Act (18 U.S.C. § 1001). Plaintiffs place this on the record to explicitly mark the boundary where state-level tactical gaslighting converts into federal-level criminal and civil exposure.

G1: Email from Debra Rizzi to Judge Wheeler's chambers H2: Response from Plaintiff McNeil

G1: Response from Plaintiff McNeil

Exhibit G1: Email from Debra Rizzi to Judge Wheeler's chambers.

From: Debra Rizzi <Debra.Rizzi@phelps.com>
Sent: Tuesday, June 30, 2026 4:06 PM
To: Wheeler, Will Law Clerk (Jordyn Holley)
Cc: Alicia Bolyard; Chris Manning; jeff@jwklegal.com; Jeffrey Kuykendall; holly.beeson@llr.sc.gov; Graham Mitchell; chris thaut.io; C&M McNeil; Cynthia Wenstrand; Kevin O'Brien
Subject: Re: Case No. 2025CP1005095 - James C. McNeil, et al., v. SAC 181, LLC, et al. - Further Harassing E-Mails from Plaintiff
Attachments: 2026.06.29 - Email to Jonathan Altman from C. McNeil.pdf; 2026.06.29 - Email to Charlie Altman from C. McNeil.pdf

Judge Wheeler and Ms. Holley:

I am sending this e-mail on behalf of Attorney Kevin O'Brien.

Attached for Judge Wheeler's review are more recent correspondence from Plaintiff, which Mr. O'Brien believes are harassing and threatening to our client and its members, and which Mr. O'Brien respectfully submits relate to the Motions Judge Wheeler heard on May 28, 2026, and particularly the Motion for Sanctions.

Especially given these e-mails and the other recent correspondence and filings from pro se Plaintiffs, SAC 181, LLC certainly looks forward to Your Honor's rulings on the Motions heard on May 28, 2026, and would appreciate receiving the rulings at Your Honor's earliest opportunity. Mr. O'Brien respectfully submits that the attached correspondences and the other recent correspondence and filings from Plaintiff and the increasing frequency of same evidence that Plaintiff has recommenced his sanctionable behavior and continues to make statements and what we believe are threats that show either a gross misunderstanding or disregard for many laws. Mr. O'Brien further believes that they evidence that Plaintiffs clearly have not heeded the Supreme Court's admonitions and warnings, and that they fail to recognize and understand the arguments and proceedings that took place on May 28, 2026.

Again, we and our client will look forward to the Court's rulings at Your Honor's earliest opportunity. If Your Honor needs anything further from us, please let us know.

Respectfully Submitted,

Debra Rizzi

Legal Assistant
Insurance and Reinsurance
Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5315
Fax: 919-789-5301
Email: debra.rizzi@phelps.com

Exhibit G2: Response from Plaintiff McNeil

From: chris.thaut.io
To: [Debra Rizzi](#); [Wheeler, Will Law Clerk \(Jordyn Holley\)](#)
Cc: [Alicia Bolyard](#); [Chris Manning](#); jeff@jwklegal.com; [Jeffrey Kuykendall](#); holly.beeson@llr.sc.gov; [Graham Mitchell](#); [C&M McNeil](#); [Cynthia Wenstrand](#); [Kevin O'Brien](#)
Subject: RE: Case No. 2025CP1005095 - James C. McNeil, et al., v. SAC 181, LLC, et al. - Further Harassing E-Mails from Plaintiff
Date: Tuesday, June 30, 2026 4:48:00 PM
Attachments: [image001.png](#)
[image002.png](#)

Judge Wheeler and Ms. Holley:

Plaintiffs write briefly to respond to the correspondence Ms. Rizzi sent on June 30, 2026, on behalf of Mr. O'Brien, which characterized two of Plaintiffs' communications as "harassing and threatening."

Plaintiffs respectfully ask the Court to receive the following clarifications before adopting any such characterization in connection with the matters heard on May 28, 2026.

- 1. The communications are direct party-to-party notices, not improper contact.** Plaintiffs are pro se parties. The communications at issue were addressed to Charles Altman and Jonathan Altman as individuals. Communication between opposing parties is permitted; the no-contact rule of Rule 4.2, SCRPC, governs attorneys rather than self-represented parties communicating directly with adverse parties. The communications provide notice and an opportunity, and Plaintiffs stand on their plain text, which Defendants themselves have now placed before the Court.
- 2. Their potential individual exposure is a matter Plaintiffs are going to pursue in federal court.** The communications expressly addressed that contemplated federal exposure and advised each recipient to obtain independent federal counsel.
- 3. The state matter is at or near conclusion, and Plaintiffs are committed to the federal track.** Plaintiffs have requested a stipulation of dismissal and anticipate that this action stands a single ruling or stipulation away from conclusion. Plaintiffs' forward focus is the federal track. The communications reflect that posture and were sent in that context.
- 4. A conflict prevents responding counsel from acting for the Altmans individually here.** Plaintiffs' communications raised, and continue to raise, a concern under Rule 1.7, SCRPC. The attorney responding on behalf of "our client and its members" is among the parties Plaintiffs are committed to naming in the forthcoming federal action. That forthcoming adversity is precisely why the communications were directed to the Altmans personally and why they advised independent federal counsel. Plaintiffs raise this respectfully and solely so the Court understands the posture; Plaintiffs recognize that the federal action has not yet been filed and characterize the matter accordingly.

5. **Request.** Should any party ask the Court to treat these communications as "harassing" or "threatening," *Plaintiffs respectfully request that such characterization be supported by specific quotations* and the identified legal standard, and that Plaintiffs be afforded an opportunity to be heard before the Court adopts it. Plaintiffs remain available to address any of the foregoing at the Court's convenience.

Plaintiffs remain committed to a record that any reviewing body - now or later - can read as fair, complete, and accurate.

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
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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/>

From: Debra Rizzi <Debra.Rizzi@phelps.com>
Sent: Tuesday, June 30, 2026 4:06 PM
To: Wheeler, Will Law Clerk (Jordyn Holley) <wwheelerlc@sccourts.org>
Cc: Alicia Bolyard <abolyard@rlattorneys.com>; Chris Manning <cmanning@rlattorneys.com>; jeff@jwklegal.com; Jeffrey Kuykendall <jwkuykendall@jwklegal.com>; holly.beeson@llr.sc.gov; Graham Mitchell <graham.mitchell@nelsonmullins.com>; chris thaut.io <chris@thaut.io>; C&M McNeil <mcneilandpoyer@gmail.com>; Cynthia Wenstrand <cynthia.wenstrand@phelps.com>;

EXHIBIT H

THE PREDICTIVE VALIDITY OF SYSTEMS ANALYSIS

**(APRIL 23, 2026 OPEN LETTER, ORIGINALLY TO HAVE BEEN PUBLISHED ON
HOUSINGJUSTICEAUDIT.COM, BUT FOR HISCOX INSURANCE'S
INTERVENTION, WHICH THEY REVERSED AFTER ISSUING A TYGER RIVER
DUTRY ACKNOWLEDGEMENT IN WRITING)**

From: chris.thaut.io
To: [Kevin O'Brien](#); [Alicia Bolyard](#); [Gladys Lambert](#); jeff@jwklegal.com
Cc: [C&M McNeil](#); caltman@caltmanlaw.com
Subject: A Systems Condition Report for Our Future Selves and the Curious | McNeil et al v SAC a181, LLC et al | Case No. 2025-CP-10-05095
Date: Thursday, April 23, 2026 12:06:00 PM

To: Kevin O'Brien, Alicia Bolyard, Jeffrey Kuykendall, and Gladys Lambert (IPG Claims)

A Systems Condition Report for our Future Selves and the Curious.

This email will be published live on the Housing Justice Audit website.

The purpose is to document this moment with an analysis and prediction I believe will stand the test of time, as have earlier predictive models.

There is a type of system based on a distorted reality field maintained at whatever cost by a central actor. And there's a specific pattern to how such systems evolve and collapse in both the business and legal worlds.

You might recognize the following example before I reveal who it is:

- **The False Narrative & The Central Operator:** A system driven by a central operator who projected an image of absolute professional competence. But the day-to-day operations are built on misrepresentations, systemic regulatory violations, and falsified data.
- **The Enablers & Willful Blindness:** The operator's power is entirely dependent on highly respected, wealthy enablers. These backers lent their prestige and capital to the enterprise, but practice complete "unconscious abdication". By looking the other way and failing to audit the actual operations, they allowed the toxic system to persist.
- **Lawfare and the Agents of Harm:** When individuals within the system attempt to sound the alarm, the operator does not course-correct. Instead, the operator uses the enablers' resources to deploy aggressive, high-priced legal counsel. These attorneys acted as "agents of harm," launching a coordinated campaign to gaslight the whistleblowers, crush them with procedural friction, and protect the operator at all costs.
- **Regulatory Obstruction:** As the net tightens, the system engages in calculated obstruction of formal regulatory investigations. They use legal maneuvering to block subpoenas, interfere with third-party witnesses, and prevent investigators from accessing the underlying data that would expose the fraud.
- **The Core Illusion:** The entire defense strategy rests on minimizing the scope of the

problem. They continuously insisted to funders, attorneys, and the public that the issues are just minor, routine technicalities - right up until the undeniable truth breaks through, resulting in a catastrophic collapse that obliterates the enablers' wealth and reputations.

Who is this? This is Elizabeth Holmes and the Theranos collapse. Oh, did you think I was talking about someone else?

That was not a failure caused by one person acting alone; it was a massive system of intelligent, highly credentialed professionals - board members, attorneys, and investors -who built a fortress around a false reality.

Most of those professionals did not set out to participate in fraud. They were fed a curated, siloed narrative by a central operator. They ratified that narrative because their incentive structures rewarded them for believing it, and they defended it aggressively because that is what their business model dictated.

When you study the timeline of those collapses, the most volatile window is the period right before the end. As the actual operational record begins to surface - through audits, subpoenas, or whistleblowers - the central operator works hardest to maintain narrative control out of pure desperation, attacking the reality of anyone pointing at the facts.

They do this until maintaining the illusion becomes literally impossible.

This brings up a serious question for any professional caught in the orbit of such an enterprise: **is it viable to exit the system before the collapse, when the operator is fighting so hard to keep you in the dark?**

The historical record is very clear on the answer. The enablers and agents who realize they are participating in a delusion play and [step out early](#) - they take a short-term disruption, but their careers survive.

The ones who stay, who allow their professional credibility to be used as a shield for the operator until the bitter end?

They become permanent collateral damage in the historical record. The system is mathematically guaranteed to collapse under the weight of its own documented acts.

And that time will come. They know it and I know it.

The questions are how soon that will happen, and how many rounds of escalating harm to targets and accompanying rounds of financial exposure to funders will occur before the inevitable collapse.

Now, for our situation...

I don't consider myself excellent in the role of lawyer. I am competent only because of hard work and the ability to learn quickly. But I am very good at being a litigation consultant for [systems analysis & design](#), and [strategic communications](#). That is the role I have mostly applied to this case, and it is a role I do not perceive operating on your side.

The only strategy the current incentive structure you operate within appears to produce is **the maximization of billed hours**. That is what the system is designed around, and it is a terrible system design. If this is normal, **an innovative firm could put sunlight on the difference between that approach and one with redesigned incentives that align with the clients' goals, both of the insurance carrier and of the end-user**. Everyone would do better by eliminating waste, and the best business would naturally flow to that model.

But here's what's relevant about that:

An incentive structure focused on billed hours makes practitioners vulnerable to clients pushing blatantly delusional, minimizing case frames and an unwillingness to settle on fair terms - even when the "client" directing the litigation is just a *representative* of the actual client, or perhaps a codefendant. It creates vulnerability, especially when there is a clear conflict of interest between that false frame and the real client's exposure.

The giveaway acts here are consistent and persistent, forming patterns that clearly convey what is driving them. What drives them is a framework of incentives based on a mental model of lack and mechanical thinking - one that completely misses [the emergent magic of reciprocity](#).

I'm going to offer you some good-will advice:

What I want for you is that, as the predictions I have published to the date-stamped record continue to prove accurate, you **view those outcomes in the light of that dysfunctional mental model**. It is prevalent but sub-optimized when compared to a good "[Most Vulnerable Member wins too](#)" system design that doesn't generate "failure demand" - to borrow a term from the Vanguard Method at the center of the [successful UK housing redesign](#), where tenant experience and profits increased while costs decreased.

The problem is that the current business model treats litigation as a cost center rather than as

a value-add. I understand this is baked into the structure you inherited to a degree, but you, O'Brien, have enough control and influence to change it. And Bolyard can make decisions about her career trajectory going forward based on these principles, should she make the right choice.

Kuykendall, your position is distinct from the others here. You are not insulated by a carrier. Your client's exposure is direct and personal, and the evidence pipeline that is now open will make that exposure visible in ways that cannot be managed procedurally. The question for you is not whether the system collapses. It is whether your client is still inside it when it does.

Lambert, you are a funding mechanism for the litigation strategy this letter describes who has been informed of the harm and continued. The question IPG should be asking is whether the case picture you have been given accurately reflects the documented evidentiary record, or whether you are being managed toward a trial exposure that dwarfs what an early resolution would have cost.

Hiscox Insurance has similarly funded this litigation strategy, but I have no direct evidence of an agent who was directly informed of the harm this has caused at this time.

It does sadden me to witness a continued adherence to a case frame that clearly has a limited shelf life. What do you really think is going to happen when the truth is unavoidable?

Court networks may have participated in the friction game, but at this point, that doesn't even matter. With this campaign and these paradigm-changing goals, we now win by the length of time this drags on. The more time, the more visibility and support gained. The more time, the better polished the [Housing Justice Audit](#) will be when handed to a jury. With the structural disclaiming of any settlement, time is on our side in a way that it typically is not for pro se litigants.

When a partner firm onboards, that will continue to be true as I can function more fully in the consultant role I am strongest in.

The system is already showing signs of exactly the collapse I predicted months ago in the date-stamped and now archived [Open Letter to the Altmans](#). Check out the diagram at the top – the most recent one.

I do not have it in for you, in spite of what I perceive as your cowardice contributing to conduct that is consistent with [intentional psychological abuse](#).

But I will hold this system accountable, and I already am. It's a slow burn, but [your names are](#)

[associated with this treatment](#) in the permanent record. That is just part of the paradigm engine. If you had instead used the core approach I recommended above, none of what you are experiencing now would be happening. Because the paradigm engine isn't targeting you for negative exposure - it is just targeting the acts that reveal that bad paradigm.

You are currently inhabiting that paradigm, and that is a choice. A choice you can still change, but time is running out.

Let us revisit this letter down the road and see how it stands the test of time.

You are welcome to provide a public rebuttal, which I will host adjacent to the already posted [evidence](#).

But this level of public accountability is what you are going to be dealing with for the rest of this case by choosing to keep the mindset that made you vulnerable to client false-framing pressure. It will continue to amplify as the record lengthens.

And it should amplify. Because my family has suffered real, unnecessary harm under this broken system, while defense exposure was simultaneously run up for the perceived benefit of a single client, sacrificing the needs of the others.

The purpose of this letter is not punishment; it is visibility, because visibility is the minimum condition under which systemic change becomes possible. Because this litigation has been denied an ordinary resolution path, the path that remains open is the one that requires the systemic pattern to become publicly visible. That is the path I am now required to take.

In order to secure the national exposure necessary to survive this prolonged litigation - in a case that should have settled early based on the documented facts - I must now blow the whistle on multiple powerful entities in Charleston.

You can read the details on the [Open Letter to Mayor Cogswell page](#). There is a reason there is a media blackout in Charleston on the story of a [conflicted affordable housing commissioner](#) whose family exploits tenants through a central-actor structure while he - based on the documented estate valuation discrepancies presented in the 12/3/25 and 12/11/25 court filings - appears to have engaged in conduct consistent with probate fraud. And this is occurring while he advises the mayor on initiatives like Project 3500, asking for federal money for housing for the vulnerable. The reason for the blackout is that the Peninsula of Charleston, a multi-billion-dollar luxury senior community project, rents the first floor of the Altman building. And it is owned by a partnership that includes the Post and Courier's parent company, Evening Post Industries.

We are looking at a structural problem in the Charleston legal, real estate, and political systems that brings a belief system supporting tenant exploitation directly into contact with public initiatives like Project 3500.

The litigation strategy of maintaining a false reality has forced my hand to loudly blow the whistle on exactly that kind of power structure. It's what makes this story so newsworthy, and brings the coverage - and accompanying support and business - that gives us a war chest for the trial that is inevitable as of 5 PM today.

I am writing this so everyone knows what put my family in this situation. What put us here is not in dispute, and the historical record will make that clear over time.

I don't expect you to do anything, *but you still have about 5 hours to tell the truth to those who need to know and reach out to me to make a deal that avoids the full collapse.* You know how to reach me. This email publishes publicly as an open letter to participating agents in this tomorrow unless you do that.

Chris McNeil

April 23, 2026

To: Kevin O'Brien (counsel, SAC 181); Alicia Bolyard (counsel, Meridian/Tara Bayles); Jeffrey Kuykendall (counsel, MRG Investing/Adam Bayles); Gladys Lambert (IPG Claims — carrier funding the SAC 181 defense); Charles S. Altman (SAC 181, LLC)

This letter will be published publicly at rocketsfight.org on April 24, 2026, absent a good-faith outreach before 5:00 PM EDT today.

Chris McNeil

Founder, Thaut

Strategic Thought Leadership

Mobile 843.818.3495

<http://thaut.io>

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

Author of (upcoming): [Strategic Thought Leadership: The Book](#)

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