

CP-10-02237. **That litigation occurred before ChatGPT** (launched November 2022) or Claude (launched March 2023) existed, making defendants' implicit AI theory chronologically impossible.

Plaintiffs respectfully request denial of this motion with sanctions under §15-36-10, award of pro se equivalent attorneys' fees, and order directing SAC 181 to immediately comply with outstanding discovery obligations.

SUMMARY OF THE AI POLICY AND EXISTING LAW

The SC Supreme Court's Interim AI Policy applies to judicial officers and employees; for lawyers and litigants it provides a general reminder of accuracy and confidentiality obligations and warns to use caution. It does not require Parties to disclose whether, when, or how they use AI, or to certify anything beyond the attestation already inherent in signing pleadings. (Exhibit D – The Supreme Court of South Carolina Re: Interim Policy on the Use of Generative Artificial Intelligence)

Rule 11, SCRPC, already requires that every filing be signed and that counsel/parties certify its factual and legal sufficiency after reasonable inquiry. No further "AI certification" is prescribed or needed. Any order compelling disclosures about specific tools, prompts, or methods is extraneous to accuracy and risks chilling protected, proprietary processes.

Courts routinely handle accuracy concerns with existing mechanisms: meet-and-confer, *Rule 11*, motions to strike, and targeted sanctions where warranted. Creating an extra-process disclosure regime for one side's tactical purposes is unwarranted and would become a discovery cudgel to stigmatize innovation rather than enhance reliability.

LEGAL FRAMEWORK: WORK PRODUCT PROTECTION AND FRIVOLOUS MOTION STANDARDS

Work Product Doctrine Protects Litigation Methodology

South Carolina Rule of Civil Procedure 26(b)(3) and South Carolina case law establish that "the attorney work product doctrine protects from discovery documents prepared in anticipation of litigation, unless a substantial need can be shown." *Tobacoville USA, Inc. v. McMaster*, 692 S.E.2d 526, 530 (S.C. 2010). The work product doctrine extends beyond attorney-client communications to protect "mental impressions, conclusions, opinions, or legal theories concerning the litigation." *SCRPC 26(b)(3)(B)*.

The work product doctrine "exists not only to assist the client in obtaining legal advice, but also to protect the lawyer's interest in privacy during preparation for litigation." The doctrine applies equally to pro se litigants' litigation preparation materials and methods. Multiple federal district

courts have held or assumed that unrepresented litigants enjoy work product protections. See *Hickman v. Taylor*, 329 U.S. 495 (1947) (*foundational work product case*).

SAC 181's motion seeks to compel disclosure of precisely the type of information the work product doctrine protects: Plaintiffs' research methods, drafting processes, tool selection, and strategic workflows - all "mental impressions, conclusions, opinions, or legal theories" about how to most effectively prosecute this litigation. No "substantial need" exists for this information, as SAC 181 has not and cannot demonstrate how knowing whether Plaintiffs used particular tools would assist in defending the underlying claims of postal fraud, privacy violations, and retaliatory conduct.

South Carolina's Frivolous Motion Standard

South Carolina Code §15-36-10 establishes that an attorney or pro se litigant may be sanctioned for "filing a frivolous pleading, motion, or document" where "a reasonable attorney in the same circumstances would believe that the procurement, initiation, continuation, or defense of a civil cause was intended merely to harass or injure the other party" or where the filing is "interposed for delay." *S.C. Code Ann. §15-36-10(A)(4)(a)(iii)-(iv)*.

SAC 181's AI motion meets this standard. The Interim AI Policy explicitly does not require the disclosures SAC 181 seeks. The motion was filed the next business day after SAC 181's discovery responses were due, creating a transparent delay tactic. The motion seeks no substantive relief related to case management but instead attempts to stigmatize Plaintiffs' use of modern research tools while diverting attention from SAC 181's discovery obligations and the substantive violations documented in the record.

First Amendment Concerns with Compelled Disclosure

SAC 181's requested order would compel Plaintiffs to disclose their research methods, information sources, and analytical processes—core components of how they formulate and express their legal arguments. Such compelled disclosure implicates First Amendment protections for freedom of thought and expression in the litigation context.

Courts have recognized that forcing litigants to reveal how they develop legal theories and arguments chills zealous advocacy and innovative legal thinking. The work product doctrine itself reflects these constitutional concerns, recognizing that attorneys and litigants must have a "zone of privacy" in which to prepare their cases without fear of exposing their strategic thinking to opponents.

Compelling disclosure of whether, when, and how Plaintiffs use particular research tools or AI assistance would create a precedent enabling discovery into the thought processes behind every legal argument. This is a result fundamentally at odds with both work product protection and free speech principles in advocacy.

PROCEDURAL CONTEXT: DEFENSE USE OF PROCESS AS A DELAY TACTIC

SAC 181's AI motion continues a documented pattern of defense tactics designed to burden Plaintiffs with procedural skirmishes rather than addressing substantive claims. This pattern constitutes sanctionable conduct under both *Rule 11* and *S.C. Code §15-36-10*.

TIMELINE OF CONTINUOUS EXPLOITATION (EXHIBIT A)

SAC 181 filed this motion on November 10, 2025—the next business day after their first round of Discovery responses were due (October 3 service = 30 days + 5 days for email/mail service = November 7). Rather than answering Interrogatories about Charles Altman's personal involvement in the retaliatory eviction, providing documents proving or disproving the "renovation" justification for the Notice to Vacate, or producing AppFolio syndication records showing who uploaded Plaintiffs' images to at least 21 rental platforms, SAC 181 instead filed a motion seeking to compel disclosure about Plaintiffs' research tools.

This strategic timing violates *S.C. Code §15-36-10(A)(4)(a)(iv)*, which sanctions motions "brought for any purpose other than securing proper discovery, joinder of parties, or adjudication of the claim or defense." The AI motion does not seek discovery, does not affect joinder, and addresses no element of any claim or defense. Its sole purpose is delay and harassment.

PATTERN OF FRIVOLOUS AND HARASSING FILINGS

The AI motion is the latest in a series of defense filings designed to create procedural burden: -

- October 29: SAC 181 filed Motion to Dismiss challenging well-pled statutory claims;
- November 7: SAC 181 filed Motion for Protective Order seeking stay of discovery - on the day responses were due;
- November 10: SAC 181 filed this AI motion.

Each filing diverted Plaintiffs' time from family, health, clients, and the Strategic Thought Leadership platform launch that defendants' conduct interrupted. Each filing required researched opposition briefs prepared under time pressure while managing discovery to four separate defense firms.

This cumulative burden explains any minor clerical corrections in Plaintiffs' filings—corrections that SAC 181 now exploits to imply AI misuse, despite having no evidence thereof.

Violation of Rule 4.3 Professional Conduct

Defense counsel's communications to Plaintiffs have violated S.C. Rule of Professional Conduct 4.3, which prohibits attorneys from giving legal advice to unrepresented parties whose interests conflict with the attorney's client.

Defense counsel have repeatedly:

1. made technical-sounding objections without legal merit;
2. presented weak positions with false certainty;

3. used condescending language designed to attempt to undermine Plaintiffs' confidence; and
4. attempted to intimidate Plaintiffs into accepting invalid legal positions.

(Exhibit F, Defense Counsel Communications Demonstration Pattern of Intimidation and Rule 4.3 Violations)

The AI motion continues this pattern by suggesting Plaintiffs cannot produce quality legal work without improper AI assistance, a demeaning assertion unsupported by evidence and contradicted by the sophistication of Plaintiffs' filings, which demonstrate advanced legal research, strategic analysis, and professional presentation.

Those filings by Plaintiffs include pre-AI filings in a lawsuit filed against Defendant SAC 181, LLC in 2020-2021 (Exhibit G, Plaintiff's September 30, 2021 Opposition to Protective Order Demonstrating Pre-AI Litigation Competence)

THE REAL WORKFLOW: HUMAN-LED STRATEGY WITH TOOLS AS ACCELERATORS

Contrary to SAC 181's insinuations, Plaintiffs' methodology is human-led: schema design, double-loop learning, excellence modeling, and ethical narrative architecture, in which modern tools accelerate research and drafting but do not supplant human judgment or *Rule 11* responsibility. Plaintiffs' July 2025 eBooks—published just before the retaliatory eviction—demonstrate an advanced, values-centered system for public-interest thought leadership that integrates ethical outreach and responsible amplification. Those works show what was poised to launch, and what defense conduct derailed. (Exhibit B: "Get AI Marketing For Us" (7/15/25) PDF; Exhibit C: "Respectful Reach" (7/23/25) PDF; Exhibit E)

Get AI Marketing For Us (7/15/25): codifies a human-first, schema-based approach to harnessing tools for ethical propagation, with humans setting standards, verifying facts, and structuring arguments - fully consonant with *Rule 11* and the Interim AI Policy's reminder. (Exhibit B)

Respectful Reach (7/23/25): articulates norms for principled outreach, reducing harm and increasing public value—again underscoring that the "real engine" is human discernment and verified accuracy, not "AI" as a black box. (Exhibit C: "Respectful Reach" (7/23/25) PDF)

These publications, immediately preceding the forced move, corroborate Plaintiffs' testimony that the defense's actions interrupted a social-impact launch and forced Plaintiffs to triage time into litigation survival - contributing to occasional, promptly corrected drafting errors unrelated to any technological assistance.

The negative impact on Plaintiff McNeil's time and energy can be further demonstrated by an examination of the supporting social media activity connected with the interrupted launch of the Strategic Thought Leadership + AI-Supported Influence campaign, with both X(Twitter) and LinkedIn accounts showing thriving activity before the forced move and nearly zero after,

continuing to stay flatlined during the time-consuming litigation. (Exhibit E, Platform Dropoff Showing Halt of Strategic Thought Leadership Velocity and Exploitation of Plaintiff Time Resources)

LEGAL DEFICIENCIES IN SAC 181'S MOTION

SAC 181's Motion Misapplies the Interim AI Policy

The Supreme Court of South Carolina's Interim AI Policy (March 25, 2025) applies to "judicial officers and employees of the Judicial Branch." (Exhibit D, §I). The Policy provides guidance for judges using AI tools and reminds attorneys and litigants of existing obligations regarding accuracy and confidentiality.

Critically, the Policy imposes no new duties on attorneys or litigants. Section IV states: "Lawyers and litigants are reminded of their existing obligations under the Rules of Professional Conduct and Rules of Civil Procedure to ensure accuracy of factual assertions and legal citations, and to protect confidential information." The Policy does not require disclosure of tools used, certification of AI usage, or any reporting beyond what *Rule 11* already mandates—that signed filings are made after reasonable inquiry and are well-founded in fact and law.

SAC 181 asks this Court to create obligations the Supreme Court explicitly did not create. The requested order would exceed the Policy's scope and contradict its plain language limiting special duties to the judiciary.

No Legal Basis Exists for Compelled Tool Disclosure

SAC 181 cites no rule, statute, or case law authorizing courts to compel parties to disclose their research tools, drafting methods, or information sources absent a showing that such disclosure is necessary to prove fraud, fabrication, or other misconduct. SAC 181 makes no such showing here.

The motion contains speculation and insinuation but no evidence of:

1. fabricated citations;
2. false factual assertions;
3. plagiarism;
4. violation of any court rule; or
5. any other concrete harm requiring judicial intervention.

SAC 181 points to minor corrections in Plaintiffs' filings—corrections that Plaintiffs promptly made and that demonstrate responsible compliance with *Rule 11*'s duty to correct errors when discovered.

Absent evidence of actual misconduct, compelling disclosure of litigation methodology would:

- Violate work product protection under *SCRPC 26(b)(3)*

- Create precedent for invasive discovery into every litigant's research process
- Chill innovative and efficient litigation methods
- Discriminate against pro se litigants and small firms using modern tools
- Provide no legitimate case management benefit

***Rule 11* Already Governs Accuracy—Additional Certification Is Unnecessary**

SCRCP Rule 11 requires that every pleading, motion, or paper be signed, and that the signature constitutes certification that:

1. the signer has read the document;
2. to the best of the signer's knowledge after reasonable inquiry, it is well grounded in fact and warranted by law; and
3. it is not interposed for delay or harassment.

Plaintiffs' signature on every filing already provides this certification. SAC 181 has not moved to strike any filing under *Rule 12(f)*, has not sought *Rule 11* sanctions, and has not identified any specific false statement requiring correction. The remedy for inaccurate filings is a motion to strike or *Rule 11* motion—not a roving commission to investigate research methodology.

Creating an additional "AI certification" requirement would:

- Duplicate existing *Rule 11* obligations without adding protection
- Single out one category of research tool for special scrutiny
- Require courts to police tool usage rather than filing accuracy
- Generate satellite litigation about tool definitions and disclosure scope

WHY THE REQUESTED ORDER SHOULD BE DENIED

The Interim Policy does not authorize litigant/tool disclosures. The Policy expressly does not impose special duties on attorneys/litigants beyond the extant obligation to ensure accuracy; SAC 181's proposed order exceeds the Policy's scope and would invite process abuse and collateral disputes over tooling, prompts, or methods having no necessary nexus to reliability. (Exhibit D)

Rule 11 already supplies the standard. The right safeguard is the one already in place - signature attestation after reasonable inquiry. If the Court wishes to say anything, it should reiterate that Parties remain responsible for verifying citations and facts, consistent with current rules—nothing more.

Compelled disclosure would chill legitimate, proprietary workflows. Forcing Parties to reveal how they structure research/writing—human or tool-assisted—invades protected work product and confidential competitive methods, while offering no reliability benefit beyond the accuracy assurances already sworn.

The motion is yet another time-wasting detour amid discovery noncompliance. With discovery overdue and meet-and-confer shortcomings on record, this motion looks like a public-relations gambit to shift attention away from core obligations. The Court should focus the Parties on production and substantive merits.

PLAINTIFFS' UNWAVERING COMMITMENT TO TRIAL AND DOCUMENTATION OF DEFENSE OBSTRUCTION

Exhaustion Does Not Equal Capitulation

While Plaintiffs acknowledge that managing this litigation against four law firms, six attorneys, and five defendants over 62 consecutive days has required extraordinary time and energy, resulting in occasional minor clerical errors promptly corrected, this exhaustion in no way diminishes Plaintiffs' absolute commitment to taking this case to trial.

Plaintiffs are 100% prepared for trial. Every defense obstruction tactic - every frivolous motion, every missed discovery deadline, every procedural skirmish designed to drain resources - is helpful to Plaintiffs in the sense that it becomes further documented as evidence of the systemic power imbalance this case seeks to remedy. The defendants' conduct proves Plaintiffs' central thesis: that property management companies wield disproportionate power over vulnerable families, and that accountability requires meaningful penalties.

Defense Obstruction as Proof of Systemic Problems

The pattern of defense conduct in this case - from the initial falsified postal documentation (filename metadata proving September 5, 2025 creation despite August 28, 2025 claimed mailing), through unauthorized image exploitation across 21+ platforms, to the current wave of delay tactics - demonstrates exactly the type of systematic tenant exploitation that South Carolina's landlord-tenant statutes seek to prevent.

Each defense filing documented in Exhibit A (Timeline of Continuous Exploitation) serves dual purposes:

1. **Immediate:** Provides basis for sanctions, fee-shifting, and adverse inferences
2. **Strategic:** Demonstrates to future juries, regulators, and policymakers how well-resourced defendants deploy procedural complexity to evade accountability

The AI motion is particularly instructive. Rather than answer discovery about Charles Altman's knowledge and authorization of the retaliatory eviction, rather than produce documents showing who uploaded Plaintiffs' private images to dozens of rental websites, SAC 181 asks the Court to investigate whether Plaintiffs used AI tools in drafting their opposition briefs. This priority inversion - focusing on Plaintiffs' research methods rather than Defendants' substantive violations - exemplifies the defensive posture that has necessitated this litigation.

Trial Preparation Continues Despite Obstruction

Plaintiffs are simultaneously:

- Preparing comprehensive discovery responses to defendants' interrogatories
- Compiling exhibits for trial, including metadata evidence, platform screenshots, and email chains documenting legal misrepresentations
- Developing jury presentation materials
- Coordinating expert witness analysis of rental market data, property management standards, and digital privacy violations
- Building the public-interest Strategic Thought Leadership campaign that will launch soon

Every hour diverted to responding to frivolous motions is an hour taken from trial preparation, family care, and business recovery. But Plaintiffs will not be deterred. The defendants' systematic misconduct, the regulators' need for a precedent-setting case, and the thousands of Charleston renters facing similar exploitation all demand that this case reach a jury if settlement proves impossible.

Documentation for Appeals and Policy Impact

Should defendants prevail on any issue through procedural obstruction rather than merits adjudication, Plaintiffs are documenting a complete appellate record showing how the current system enables well-resourced defendants to exhaust pro se plaintiffs through motion practice designed to avoid addressing substantive claims.

This documentation will support:

- Appeals preserving meritorious claims for higher court review
- Bar complaints against counsel who violated Rule 4.3
- Legislative advocacy for procedural reforms protecting pro se litigants
- Scholarly articles and public discourse about access to justice

The AI motion will feature prominently in this documentation as a case study in how litigation tactics can be weaponized to shift focus from defendants' documented misconduct (falsified evidence, privacy violations, retaliatory eviction) to plaintiffs' research methodology—creating satellite litigation about tools rather than addressing harms.

REQUEST FOR JUDICIAL NOTICE/EXHIBIT IDENTIFICATION

Plaintiffs request the Court accept the following exhibits as demonstratives supporting the narrowness of any AI-related order and the context explaining why minor filing corrections arise from defense-created time burdens rather than misuse of technology:

Exhibit A: Timeline of Continuous Exploitation showing date-stamped defense conduct and resulting diversion of Plaintiffs' time and energy, overlapping with discovery skirmishes and compelled corrections.

Exhibit B: Get AI Marketing For Us (7/15/25) eBook (PDF), demonstrating Plaintiffs' human-led schema for responsible amplification: tools assist, but humans creativity leads while human discernment verifies.

Exhibit C: Respectful Reach (7/23/25) eBook (PDF), articulating ethical outreach principles evidencing a human-centered approach to communication and verification.

Exhibit D: The Supreme Court of South Carolina Interim AI Policy (March 25, 2025), the very policy SAC 181 cites, which applies to the judiciary and does not impose the requested litigant disclosures/certifications.

Exhibit E: Plaintiff McNeil's cessation of social media activity is shown through timeline visual graphs to demonstrate the harm done both by the defendants' actions that led to this lawsuit and by defense counsel's time-wasting tactics, resulting in understandable mistakes needing correction due to exhaustion.

Exhibit F: Defense Counsel's emails about AI, voicemail message of October 31, 2025, and analysis showing patterns of attempted intimidation and Rule 4.3 violation.

Exhibit G: Plaintiff McNeil's September 30, 2021 Opposition to Protective Order demonstrates both pre-AI litigation competence and a values-driven approach to litigation like Plaintiffs maintain in this case.


CONCLUSION

The Court should deny SAC 181's motion in its entirety. The Interim AI Policy imposes no litigant disclosure obligations. Rule 11 already governs accuracy. Work product doctrine protects litigation methodology from discovery. The motion violates *S.C. Code §15-36-10* as a frivolous filing intended to harass and delay.

Plaintiffs further request:

1. Sanctions against SAC 181 and counsel under *§15-36-10* for frivolous motion practice;
2. Pro se equivalent of Attorney fees and costs under *§15-36-10(G)(1)*, calculated to include Plaintiffs' time researching and drafting this opposition;
3. An order directing SAC 181 to immediately respond to all outstanding discovery;
4. Such other relief as is just and proper, including findings that this motion violated Rule 4.3 through its demeaning implications about Plaintiffs' capabilities

Respectfully submitted this 13th day of November, 2025.



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EXHIBIT A
TIMELINE OF CONTINUOUS EXPLOITATION

TIMELINE OF CONTINUOUS EXPLOITATION AND RESULTING BURDEN ON PRO SE PLAINTIFFS

I. PRIOR LITIGATION HISTORY (2020-2021)

2020 James Christopher McNeil v Comcast Corporate, defendant, et al

- July 14, 2020: Electric shock incident at 181 Gordon
- 2020-2021: Lawsuit filed: McNeil v. Comcast, Dominion Energy, SAC 181, LLC, and Roadstead Management
- Case No. 2021-CP-10-02237
- November 2021: Confidential settlement with non-disparagement and confidentiality clauses (specific terms cannot be disclosed per NDA)
- Plaintiff McNeil handled multiple large corporations and their attorneys WITHOUT AI (Exhibit G)
- ChatGPT launched November 30, 2022, over a year after this case settled.
- The sophistication evident in the current case reflects the same skills demonstrated in 2020-2021 litigation—skills that necessarily developed through human intelligence, not artificial intelligence that did not yet exist.
- Plaintiffs remained as tenants post-settlement through July 2025

II. PATTERN OF MISCONDUCT BY DEFENDANTS (2022-2025)

2022: Broken Promises and Deceptive Practices

- January-February 2022: Plaintiffs request replacement of broken blinds promised before lease signing
- February 24, 2022: Property manager confirms willingness to replace blinds
- August 3, 2022: Owner (SAC 181, LLC) rejects replacement despite prior representations
- 2022-2024: Still images of Plaintiffs and belongings obtained under false pretense of "inspection"

2024-2025: Escalating Legal Misrepresentations and Retaliatory Eviction

- September 5, 2024: Tara Bayles misrepresents Adam Bayles' ownership role in company
- April 2-3, 2025: Stephanie Phillips attempts to dictate inspection with less than 24 hours notice
- May 8, 2025: Stephanie falsely claims lease invalid; Plaintiff provides legal correction
- May 23, 2025: Plaintiffs submit good-faith safety proposals (protected tenant activity)
- May 29, 2025: Retaliatory Notice to Vacate issued 6 days after safety proposal—unsigned "ghost" document
- June 4, 2025: Second NTV email claims "owner has decided to do some renovations"

July 2025: Privacy Violations Through Deception

- July 14, 2025: Stephanie again misrepresents SC landlord-tenant law; Tara Bayles acknowledges Plaintiff's position is correct but continues to dictate terms
- July 14, 2025: Addison Bayles promises AI will remove Plaintiffs from photos
- July 15, 2025: Matterport virtual tour and still images created showing: Chris McNeil visible; Rocket (elderly dog in diapers) visible; "Thaut Thought Leadership" professional branding prominently displayed; personal belongings throughout

- No AI removal performed despite explicit promise

May-July 2025: True Nature of Retaliatory Eviction Becoming Evident

- July 17, 2025: With showings immediately initiated while Plaintiffs still lived there, making the “renovations” reason untenable, Plaintiffs question defendants' motives in detailed email citing 5+ year perfect payment history—NO RESPONSE
- July 19, 2025: Rent increased 73% to \$5,276/month (2 days after questioning email)
- July 26, 2025: Listing removed from market but privacy-violating images remain live

August-September 2025: Postal Fraud and False Documentation

- August 1, 2025: Forced relocation causes decline in elderly dog Rocket
- August 28, 2025: Defendants claim checks mailed with "EMAILED" postmark stamp
- Filename metadata: "MeridianScanner_20250905_161321.pdf" reveals document created September 5, 2025—8 days after alleged mailing date
- September 4, 2025: Formal demand letter sent via FedEx
- September 5, 2025: Tara Bayles provides falsified postmark documentation
- September 8, 2025: Settlement deadline expires; defendants refuse to negotiate
- September 10, 2025: Plaintiffs receive actual deposit with legitimate USPS postmark dated September 8—confirming prior documentation was fabricated

III. INTENSIVE LITIGATION MANAGEMENT BY PRO SE PLAINTIFFS (September-November 2025)

September 9-19, 2025: Case Initiation and Immediate Defense Complexity

- Sept 9: Initial Complaint filed
- Sept 9, 10:17 PM: Eric Pettis emails claiming representation of Meridian
- Sept 10: Pettis confirms representing both Meridian and SAC 181 (conflict of interest)
- Sept 15: Amended Complaint filed adding individual defendants
- Sept 18: Discovery of unauthorized images across 16+ platforms (ultimately 21 sites discovered, with as many as 30+ more, given ShowMojo’s claim they “Syndicate to Over 50 Listing Sites”)
- Sept 19: Motion to Disqualify Counsel filed after providing two courtesy warnings to Pettis

September 21-30, 2025: Evidence Preservation and Escalating Defense Responses

- Sept 21: Evidence preservation notices sent; takedown demands to platforms
- Sept 22: Enhanced Jury Risk Analysis V3 (\$2.3M-\$10.1M exposure) prepared
- Sept 23: Platforms suddenly add "coming soon" graphics covering evidence
- Sept 25: Rule 408 protected settlement offer to SAC 181 with September 29 deadline
- Sept 29: IPG insurance contacts Plaintiffs 90 minutes before Answer deadline; requests extension for answering Amended Complaint
- Sept 29: Rule 408 protected settlement offer deadline expires without response from SAC 181
- Sept 30: Two motions filed (Expedited Hearing on Disqualification; Compel Insurance Disclosure)

October 2-10, 2025: Discovery Preparation and Multiple Counsel Transitions

- Oct 2: Comprehensive evidence preservation demand with metadata specifications

- Oct 3: First round of Discovery served: 15 Interrogatories and 13-15 Document Requests per defendant, customized for each party
- Oct 8: Enhanced Jury Risk Analysis V5 prepared and served under Rule 408
- Oct 9: New counsel Alicia Bolyard appears for Meridian defendants; files Answer with crossclaims containing admission of managing "multiple properties" (contradicting record showing SAC 181 owns only one property)
- Oct 10: Pettis withdraws; another settlement offer to SAC 181 expires without response
- Oct 11: Personal service on Adam Bayles as RA of MRG Investing Company

October 15-31, 2025: Continued Intensive Litigation Activity

- Oct 15: New counsel Kevin O'Brien and Justine Tate appear for SAC 181
- Oct 17: Amended Rule 11 Motion prepared addressing new bad faith conduct served to Meridian Counsel Bolyard, allowing time for cure (no cure attempted)
- Oct 24: Motion for Leave to File Second Amended Complaint (with entire 2AC as exhibit); discovery of 5 additional platforms with Plaintiffs' images (total now 21 sites)
- Oct 29: Emergency Motion for Rule 11 Sanctions filed against Bolyard's Answer
- Oct 29: SAC 181's Motion to Dismiss filed
- Oct 30: Response in Opposition to Motion to Dismiss filed (same day turnaround)
- Oct 31: First round of Requests for Admission served to all defendants except MRG

November 2025: Defense Obstruction Tactics and Frivolous Filings

- Nov 4: Third counsel Jeff Kuykendall appears for MRG; files Motion to Dismiss
- Nov 6: Defense attorneys challenge validity of October 3 Discovery service via multiple emails; Plaintiffs file Notice of Prior Service and Computed Deadlines to clarify record
- Nov 7: SAC 181 attorneys file Motion for Protective Order and Stay of Discovery on day their Discovery responses are due
- Nov 7: Bolyard misses Discovery deadline for Meridian defendants
- Nov 10: SAC 181 attorneys file Motion for Case Management Order for Use of AI, a frivolous filing implying the quality of Plaintiffs' pro se work is only due to AI. This contention is chronologically refuted by Plaintiff's successful 2020-2021 litigation (Case No. 2021-CP-10-02237) against their own client SAC 181, along with Comcast, Dominion Energy, and Meridian's predecessor Roadstead, before ChatGPT or Claude existed

IV. CUMULATIVE IMPACT ON PRO SE PLAINTIFFS

Plaintiffs have prepared and filed the following since September 9, 2025 (62 days):

- 1 Initial Complaint
- 1 Amended Complaint
- 1 Proposed Second Amended Complaint with comprehensive exhibits
- 5 substantive motions
- 5 Jury Risk Analyses (JRA1, JRA2, JRA3, JRA4, JRA5)
- 1 Evidence preservation demand with technical specifications
- First round of Discovery (65+ Interrogatories and Document Requests across 5 defendants)
- First round of Requests for Admission (120+ RFAs across 4 defendants)
- Multiple evidentiary preservation notices to third-party platforms
- Multiple responses to defense counsel communications

- Regulatory complaint documentation
- Research and documentation of 21+ platforms displaying privacy violations

Defendants have deployed four separate law firms with at least six attorneys, creating:

- Multiple simultaneous counsel transitions requiring Plaintiffs to adapt to new communication patterns
- Coordinated but inconsistent discovery objections requiring individualized responses
- Strategic filing of motions on eve of their own discovery deadlines
- Emails containing demeaning language and misrepresentations of procedural rules
- Frivolous motion practice (AI motion) designed to distract from substantive legal violations

V. DEFENDANTS' PATTERN OF EXHAUSTION TACTICS

The AI Motion represents the culmination of Defendants' strategy to:

- Deploy volume strategy using weak legal positions requiring extensive rebuttal, while evading discovery obligations regarding defendants' actual misconduct (correcting bad legal work takes MORE time than responding to good legal work)
- Deflect attention from Defendants' own fabrication of evidence (postal documentation with metadata proving September 5 creation despite August 28 claimed mailing)
- Impugn Plaintiffs' substantial pro se work product rather than address underlying legal violations
- Create additional litigation burden requiring response preparation while Discovery deadlines pass

Any minor clerical errors in Plaintiffs' filings result from:

- 62 consecutive days of intensive litigation management
- Responding to four separate law firms and six attorneys simultaneously
- Conducting comprehensive legal research without access to institutional resources
- Managing evidence preservation across 21+ platforms
- Preparing technically complex Discovery tailored to each defendant
- Addressing defendants' pattern of legal misrepresentations dating to May 2025
- Emotional impact of privacy violations, forced relocation, and harm to elderly dog Rocket

These errors do not reflect AI usage – AI like ChatGPT or Claude was not available for Plaintiff's 2020-2021 litigation against their client - but rather the exhausting reality of pro se representation against well-resourced defendants deliberately deploying obstruction tactics to waste Plaintiff's time, while refusing to address the substantive violations at the heart of this case: falsified postal documentation, unauthorized commercial exploitation of family images across dozens of platforms, retaliatory eviction, and systematic tenant rights violations.

VI. CONCLUSION

The continuity of exploitation = from broken promises in 2022, through deceptive image collection in 2022-2024, escalating legal misrepresentations in 2025, fabricated postal evidence, privacy violations across 21+ platforms, and now frivolous motion practice - has required Plaintiffs to maintain intensive litigation activity for over two months while defendants evade substantive responses through procedural obstruction.

The AI Motion is not a good-faith effort to address legitimate concerns about case management. It is another tactic in Defendants' pattern of shifting focus from their own documented misconduct to attacking the Plaintiffs who have exposed it.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, sweeping initial 'J' followed by a cursive name that appears to be 'C. McNeil'.

James C. McNeil, Pro Se Plaintiff
On behalf of himself and Meaghan Poyer

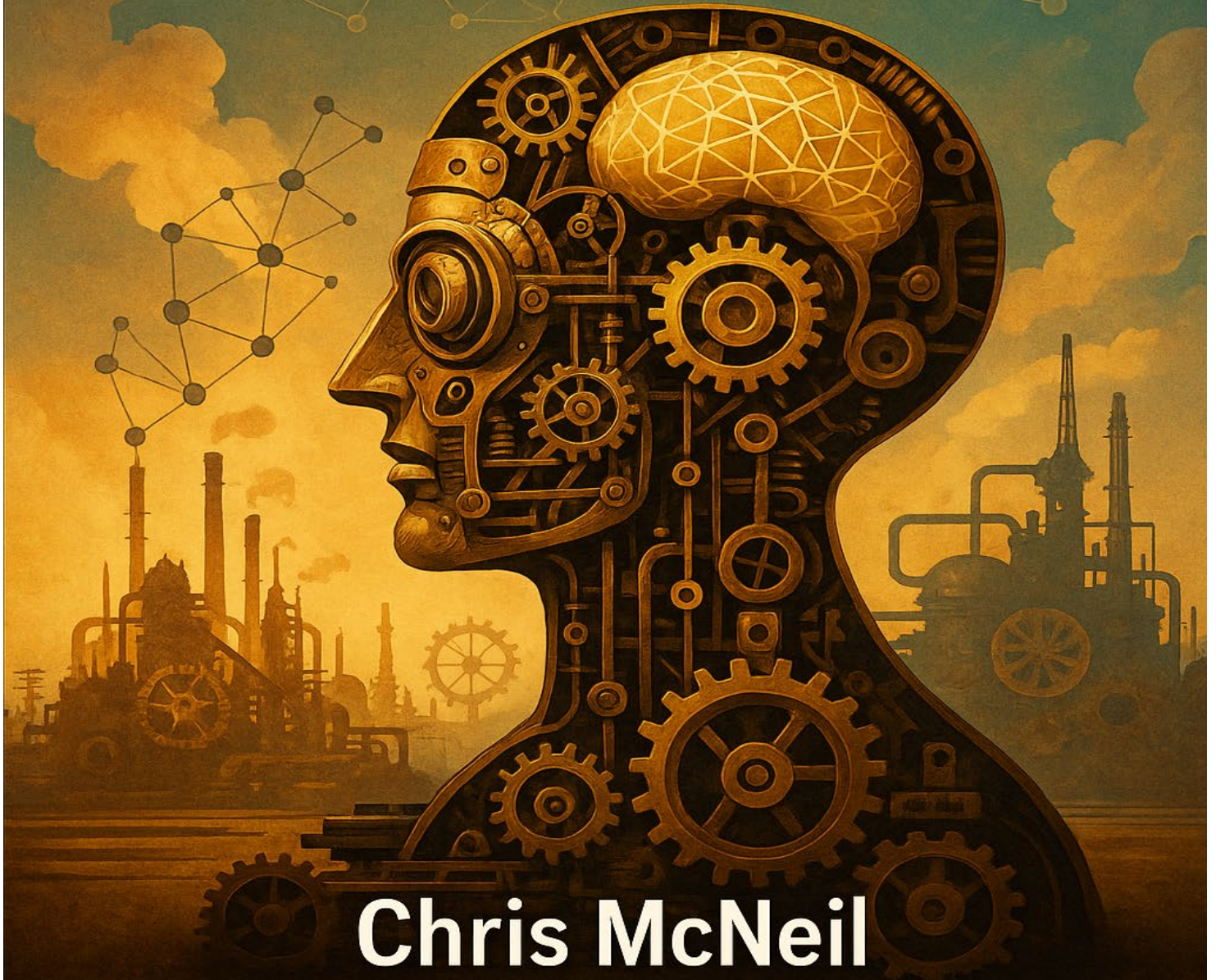
Date: November 12, 2025

EXHIBIT B
GET AI MARKETING FOR US PDF (7/15/25)

As available at aimarketing4.us

GET AI MARKETING FOR US

Strategic Thought Leadership and Schema
enable AI chat, voice, and search selling
and marketing for you



Chris McNeil



White Paper: The New Frontier of Web Marketing in the AI Age Schema gets AI Marketing For You when Combined with Thought Leadership

Executive Summary

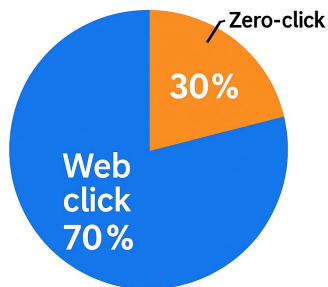
A succinct overview of how schema is now an essential pillar in AI-driven search, zero-click answers, and conversational AI platforms. Emphasize:

- Schema's role in visibility and meaning in a search landscape where AI is answering questions directly.
- The unique opportunity to embed *belief-shifting narratives* (via the Thaut Process) into schema to **pace and lead audience thinking**.
- Why schema is becoming as strategically important as SEO was in the early 2000s.

1. The Shifting Landscape of Search and Content Discovery

- Rise of AI-assisted search (SGE, ChatGPT, Bing Copilot)

Zero-click searches are increasing—
30% of queries no longer result in
traditional web clicks.



- Zero-click searches are increasing—30% of queries no longer result in traditional web clicks.
- AI is consuming and prioritizing **structured data** (schema) as its primary information source.
- Companies without a schema strategy will increasingly become invisible in AI-driven discovery.

Source: key stats from current search trends.





2. What Is Schema and Why It Matters More Than Ever

What is Schema?

Schema is like a translator between your website and AI. More specifically, it's a type of code (based on [Schema.org](https://schema.org)) that tells search engines and AI what your content means—not just what it says.

It's like adding labels and structure to your ideas so AI can:

- Understand the people, places, and concepts you mention
 - Know what kind of content it is (article, podcast, product, video, etc.)
 - Place you in the right context of expertise and authority
-

Why Schema Matters in the AI Age

In the past, SEO was about matching keywords.

Now, it's about helping AI summarize, recommend, and elevate your content across:

- Search
- Chatbots
- Voice assistants
- AI-driven feeds

If your ideas aren't structured with schema, AI might ignore you—even if your content is great.

From Syntax to Strategy: The Schema Evolution

Most people use schema only to check technical boxes:

- Is the syntax valid?
- Does it say “This is an article”?

But that's just the beginning.

We're now entering the era of strategic schema—schema used to:





Reinforce Your Thought Leadership

Schema lets you mark your unique ideas, not just your web pages.

Example:

- You write a new model like the “[Pullfillment](#)” model.
 - Schema locks in your provenance – if your [model](#) is well formulated and you use it correctly.
-

What Is Schema and Why It Matters More Than Ever

What is Schema?

Schema is like a translator between your website and AI.

More specifically, it's a type of code (based on [Schema.org](#)) that **tells search engines and AI what your content means—not just what it says.**

It's like adding **labels and structure** to your ideas so AI can:

Understand the people, places, and concepts you mention

Know what kind of content it is (article, podcast, product, video, etc.)

Place you in the right **context of expertise** and **authority**

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From Syntax to Strategy: The Schema Evolution

- Most people use schema only to **check technical boxes**:
 - ✓ Is the syntax valid?
 - ✓ Does it say “This is an article”?
 - But that’s **just the beginning**.
 - We’re now entering the era of **strategic schema**—schema used to:
-

1. Reinforce Your Thought Leadership

- Schema lets you **mark your unique ideas**, not just your web pages.
Example:
 - You write a new model like the “[Pull→Pullfillment Continuum](#)”
 - You tag it as a [DefinedTerm](#) inside a CreativeWork
 - AI now sees this model as your intellectual property
-

2. Shape How AI Perceives You

- Schema tells AI things like:
 - Who you are (Person, Organization)
 - What you're known for (knowsAbout, subjectOf)
 - What media you've appeared on (appearedOn, sameAs, mainEntityOfPage)
 - This builds your **authority profile** across AI systems—helping you rise above the noise.
-

3. Connect Content to Meaningful Models

- You can link:
- Blog posts → to your original frameworks
- Videos → to the models they illustrate
- Interviews → to the positions they support

So AI connects the **dots** in a way that **aligns with your purpose**.



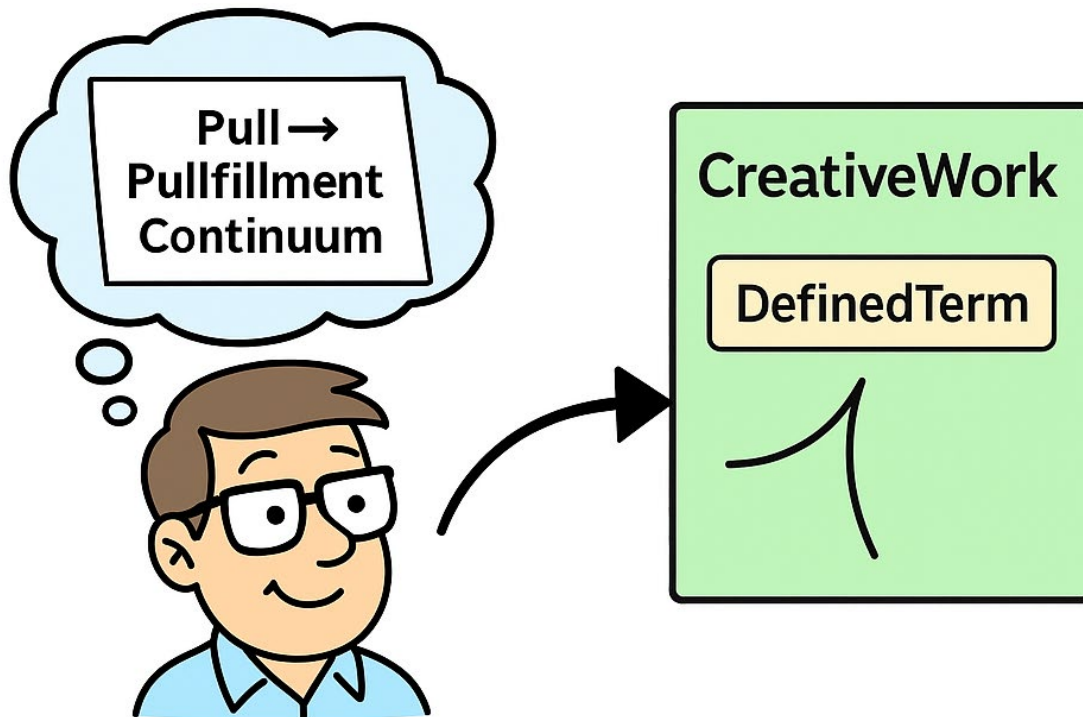


✨ Real World Analogy:

Think of schema as **metadata for your mind**.

It tells the AI what your content is about, who it's for, and why it matters—so it can help spread your influence.

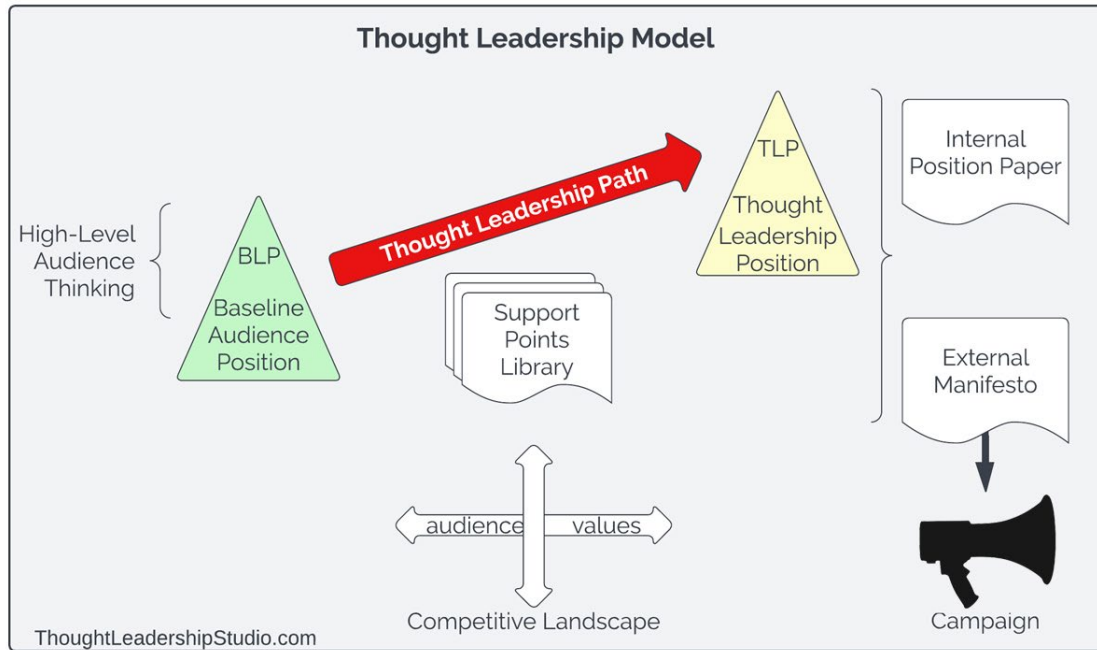
Marking Unique Ideas with Schema



Schema elevates proprietary concepts like the “Pull→Pullfillment Continuum”.



💡 Integrating Schema with Strategic Thought Leadership



Above: The 9 Building Blocks of a Thought Leadership Model [source](#)

🔍 Introduction to STL ([Strategic Thought Leadership](#)) and its Schema Connection

What is STL? Strategic Thought Leadership is intentionally leading an audience to embrace your well-constructed Thought Leadership Model.

🧠 What the Thought Leadership “9 Building Blocks” Model Graphic above Shows

1. Baseline Audience Position (BAP/ABP)

🟢 This triangle on the left represents how your audience thinks now. They might believe:

- “More content is better”
- “AI replaces human creativity”
- “If I advertise enough, I’ll win”

These are starting points, not bad beliefs—just limited ones.



2. Thought Leadership Position (TLP)

● On the right is your big idea, model, or position—what you want to lead them to believe.

Something like:

- “Strategic originality wins over repetition”
- “AI is a tool—humans must still lead”
- “Schema makes media magnetic to AI”

3. Thought Leadership Path

● The arrow between them is your guiding journey—the step-by-step ideas, metaphors, and evidence that bridge from BAP to TLP.

This is where your Support Points Library lives:

- Stories
- Analogies
- Frameworks
- Case studies
- Model Movers (influence patterns that change thinking)

How Schema Makes It All Work

Schema is the “Semantic Layer” of STL It’s code—but it speaks to AI, not just search engines. Think of it as semantic packaging for your ideas:

What You Write

How Schema Helps

A blog post shifting a belief

Article, mainEntity, author, abstract, learningResource

A new model or idea

CreativeWork, definedTerm, hasPart

A podcast interview

PodcastEpisode, Person, appearedOn, inLanguage

A key belief shift

You can embed a ClaimReview or structured FAQ to mark it semantically



Why This Matters





- Zero-click searches are rising—AI and search engines summarize content.
- Without schema, you may not even show up.
- With STL + schema, you don't just *exist*—you lead.

Your website becomes a structured thought leadership engine—
one AI wants to reference and users trust to think for themselves.

4. Practical Schema Strategies for Thought Leaders

- Use `DefinedTerm` and `Claim` schema types to mark TLPs (your belief-shifting positions).
- Use `SupportingData`, `Comment`, or `Quotation` for Support Points.
- Connect schema via properties like `about`, `hasPart`, `knowsAbout`, `educationalAlignment`, `mainEntity`.
- Use `SpeakableSpecification` to future-proof your content for voice assistants and AI-read results.

Practical Schema Strategies for Thought Leaders

| | | |
|---|---|--|
|  | DefinedTerm and Claim | Tag your well-formed, unique positions (like TLPs) |
|  | SupportingData, Comment, or Quotation (Support Points) | Use for related talking points (Support Points) |
|  | about, hasPart, knowsAbout, educationalAlignment, mainEntity | Link related schema as structured data for AI |
|  | SpeakableSpecification | Make content "speakable" to voc assistants |



Next Steps: Let's Make AI Work for You

◆ Understand Strategic Thought Leadership (STL)

Grab the free **Marketer's Guide to STL**

 <https://thaut.io/guide>

◆ Read the Free Book Introduction

The upcoming **resource site** for STL is almost here!

 <https://strategictoughtleadership.com>

◆ Tune Into the Podcast

Weekly episodes on influence, innovation, and STL in action

 <https://thoughtleadershipstudio.com>

Want a Free Website Schema Checkup?

Curious whether your current site supports schema?

Want to learn how to **package your unique knowledge** so AI helps promote it?

 **Email me for a free consult:**

chris@thaut.io

Stay Connected

◆ LinkedIn

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

Let me know if you'd like:

- A **graphic version** of this CTA block
- An **interactive web panel** formatted for landing pages
- Or a **printable QR code cluster** for easy scanning at live events

By Chris McNeil, founder of Thaut, creator of the Thaut Process of Strategic Thought Leadership



EXHIBIT C
RESPECTFUL REACH PDF (7/23/25)

As available at respectfulreach.com



RESPECTFUL REACH

WHITE PAPER

How and Why to Amplify Your Message
Online Without Tracking or Targeting People

CHRIS McNEIL



Introduction: Pivotal Moments and the Origins of Respectful Reach

By Chris McNeil

When I host interviews on the [Thought Leadership Studio podcast](#), I often ask guests to reflect on a pivotal moment - something that catalyzed their journey and gives context on how they ended up as a guest on such a podcast- one about making a positive difference with large-scale online influence.

The answers vary widely: a business failure, a sudden insight, a personal crisis, or an unexpected opportunity. But they all reflect a universal pattern: the challenge point in what has been called the [Hero's Journey](#).

It's a journey I've taken myself, one that led to the concept of Respectful Reach.

It was Joseph Campbell's model of the **Hero's Journey** - a timeless narrative arc found across cultures and eras - that George Lucas famously utilized for *Star Wars*. In interviews, Lucas said that copycat space movies that followed flopped because they "copied the wrong thing." They borrowed the *setting* of space battles but missed the *archetypal structure* that gave the story its emotional gravity.

Campbell's Hero's Journey describes a universal pattern in human storytelling - and in personal transformation. A central character is called out of the *ordinary world* by a challenge or herald, entering a *special world* filled with trials and unfamiliar rules.

With guidance from a mentor and allies, they confront inner and outer guardians - the "threshold keepers" of change. In doing so, they gain an *elixir* - a symbolic reward or insight that represents personal growth, healing, or a new power to uplift others.

It's not just a story structure - it's a psychological roadmap of the growth of human consciousness.

In myth, it might be slaying dragons. In modern life, it might be confronting addiction, fear, burnout, or limiting beliefs. But in either case, the journey involves crossing boundaries, acquiring new tools, and returning home transformed.

Pivotal Moment One – Words Unlocked States of Excellence

For me, one such moment was set up by being a scrawny teenager who was tired of being picked on so turned to weightlifting - to both build muscle and reclaim my agency.

That physical transformation set off a chain reaction. I became obsessed with performance - not just physical, but mental. I had the rare opportunity to learn from a sports psychologist who had trained two U.S. Olympic teams.

His methodology, rooted in Ericksonian hypnotherapy, unlocked something profound: I recall one particular workout where I stepped into "the zone" - a total immersion in





focus, control, and sense of limitless energy that made one set of an exercise more productive than weeks of unfocused training.

The pivotal moment was realizing that this profound state was created simply with *words*.

And if the right words - delivered the right way - can create such a state and accompanying accelerated accomplishment, I wanted to learn how to use words that way as well.

So, I did.

I immersed in Sports Psychology, which was distinct from what most people called psychology in that it had nothing to do with processing past trauma (which can mean, unfortunately, reliving it) and everything to do with optimizing performance.

It was a short jump from there to Neuro-Linguistic programming, given that Milton Erickson's was one of the early "models of excellence" studied to create NLP - a framework of replicating excellence in communication, influence, and performance in any area by modeling what the very best performers did.

Learning these disciplines also changed how I approached business. At age 20, managing multiple health clubs, I rejected traditional sales techniques and reframed the sales process around motivational coaching.

Instead of selling gym memberships, I used *words* to help people step into new beliefs and identities that aligned with healthier versions of themselves. **Sales soared because sales became empowerment.**

Pivotal Moment Two – Unlocking Systems Performance with Leverage Points

My second key pivotal moment was the revelation of the power of [Systems Thinking](#), particularly its application to service businesses via [John Seddon's Vanguard Method](#).

Most business strategies I encountered treated businesses like machines – ones that somehow never met performance expectations, Conversely, Systems Thinking deals with the surprising dynamics of systems that take on lives of their own and can push back against our best efforts Until we learn to treat them as systems.

This happens through finding what we call *leverage points* – interventions where a small input creates a large, positive change. Utilizing mental training for physical fitness is such a leverage point, there are leverage points in business usually hiding in plain sight.

Systems Thinking provides ways to find and utilize these leverage points, which I did, leading to an expanded fitness training business – Faster Fitness – that grew to over 2,000 clients in multiple locations before I exited by selling to friendly competition.

These experiences - first in the body, then in the mind, and finally in the system - shaped my philosophy.





Respectful Reach isn't just a tactic. It's a worldview. It's about marketing that empowers people and reaches them in ways that respect their autonomy. It recognizes that people aren't data points to be harvested, or cogs in a machine - they're human beings with *agency*.

Marketing, done well, respects that agency and empowers people. With *words*.

Can You Combine Reach and Respect?

Many marketers and business owners begin with a reasonable assumption:

"To grow, you have to target people. It's just how marketing works."

This belief often comes from positive intent: the desire to get results, use resources efficiently, and meet people where they are.

But a growing body of evidence - and my experience - suggests that targeting based on harvested behavioral data is not the surest path to healthy business growth.

In fact, it is holding brands back.

I invite you to join me in this journey of *words unlocking helpful states* and the *systems view finding silver bullets* – in this case with a different take on marketing.

It's a take *designed from the end use point of view* for their **empowerment**.





The Problem with Traditional Data Targeting

Google and Facebook largely determined the course of internet marketing with the “free stuff in exchange for your data” model.

Businesspeople have bought in, hypnotized by the endless graphs of data points allowing ever more precise views of potential customers’ past behaviors, assuming they will continue to follow the same tracks.

But what about those potential customers?

What do they think about having their data harvested and used to target them?

And how does this method play in the John Seddon/ Vanguard Method view of the world, where it is acknowledged that *the customer sets the value of a service*, so only by designing that service from the customer point of view can waste be fully flushed out and value – and accompanying profits – maximized?

Is our web media not also a service, in this case for potential customers who exchange their time, attention, and engagement for what they perceive as value in empowering wise decision making and full value extraction in a category?

So, this behavioral targeting can *seem* precise. But it often:

- Interrupts rather than invites.
- Relies on historical patterns that may no longer apply.
- Assumes that past behavior defines future intent.
- Undermines trust by treating people like data sets instead of decision - makers.

Over time, it feeds The Data Harvesting Industrial Complex: more privacy invasion, more noise, less respect, and less trust.

As consumer sentiment shifts toward privacy, transparency, and agency, brands relying on invasive targeting risk falling behind.



Toward a Whole - System Approach to Marketing

To best understand how and why *Respectful Reach* is so powerful, we should – like Seddon does with his Vanguard Method - think in *systems*.

Let me clarify because when I've used the term *Systems Thinking* with people who are unfamiliar with the discipline, they usually misunderstand, thinking I am talking about complex checklists and processes.

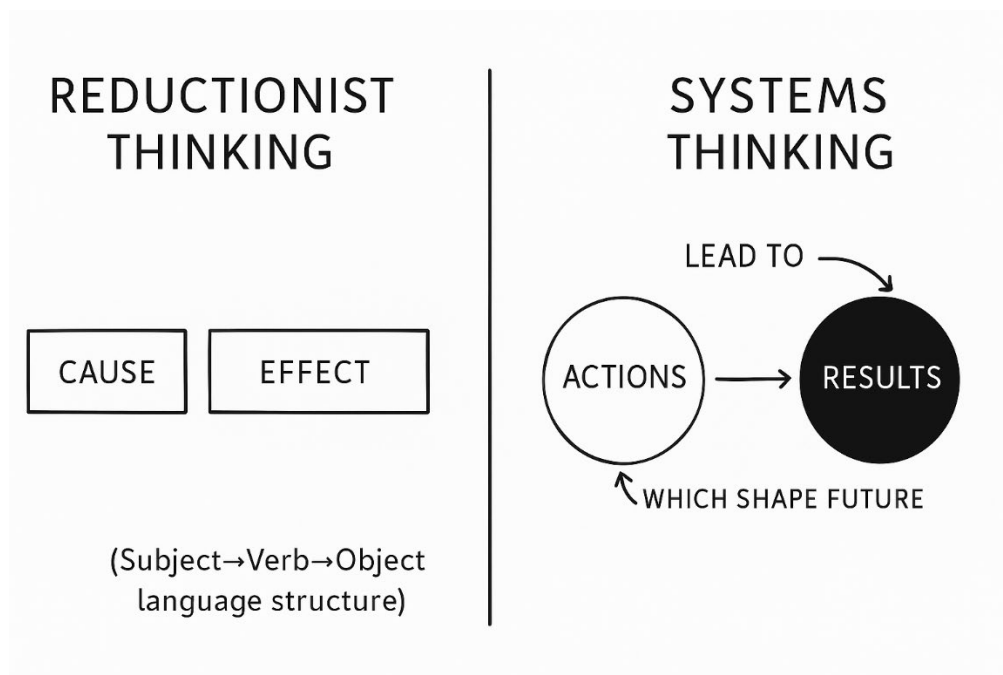
That's not what I mean.

Systems Thinking, in this definition, was created by Jay Forrester at MIT and modeled with approaches like those of Edward Demmings, the American who facilitated the Japanese Industrial Revolution and made Toyota what it is today.

To fully grasp *Respectful Reach* works, we need to think in terms of systems.

And *Systems Thinking* is - in my experience - best explained to newcomers to the discipline as the counterpoint to reductionist thinking.

As this graphic shows, Reductions Thinking is linear and Systems Thinking is circular.



Systems Thinking is the counterpoint to reductionist thinking. Reduction thinking breaks things into parts, tracing linear causes, and trying to solve problems in isolation.



In contrast, Systems Thinking looks at interconnections, feedback loops, dynamic patterns, and how outcomes emerge from the behavior of the whole.

And what is a *System*, in this view of the world?

According to Russell Ackoff, a system is a whole that consists of parts, each of which can affect its performance or properties, but none of which can have an independent effect on the whole.

The key insight in Ackoff's definition is that a system's essential properties emerge from the interactions between its parts, not from the parts themselves. When you take a system apart, you lose what makes it a system - you destroy the very thing you're trying to understand. The parts derive their function and meaning from their role within the whole.

For example, if you disassemble a car completely, you no longer have a car - you have a collection of parts that cannot provide transportation. The "car-ness" exists only when the parts work together as an integrated whole

For most of us, it's not intuitive to see a system as a system.

One of the biggest obstacles to truly seeing systems is also – when utilized properly – the key to unlocking human potential.

It's something we rarely question: our *language*.

As Alfred Korzybski observed, "The map is not the territory." Language, while indispensable for communication, also distorts reality through what he called deletion, distortion, and generalization. These filters - unavoidable in any act of labeling or describing - can lead us to confuse simple representations with the actual complexity of what's happening.

And the structure of most Western languages reinforces this reductionism.

Our subject-verb-object grammatical structure - "*We target them*", "*they clicked the ad*" – mirrors a linear, mechanical understanding of causality. These sentences also hint towards the if-then = meaning structure of belief systems: "*If I serve an ad to this demographic, then they'll convert*".

But beliefs shaped in this form tend to ignore the counterintuitive nature of real systems.

Because real systems push back.

What feels like a clear "cause → effect" chain often hides delays, nonlinear loops, feedback effects, and unintended consequences. A campaign may drive clicks but erode trust. A tactic may win a moment but lose the relationship.

To shift from this rigid, linear framing to a more accurate view, we must adopt the circular logic of systems. We must see how actions create results, which feed back into future actions—a loop, not a line.





When you see marketing through this lens, you can finally identify leverage points - those precise places in the system where a relatively small, well - placed change can produce disproportionately powerful results.

It's not about doing more. It's about seeing more clearly. Pushing too hard against a non-moving wall – as it often feels when a system resists our best efforts – can occupy us to the point that we miss that there's a nearby door.

That nearby door is seeing and working with the system.

And that difference - between pushing harder and seeing the system - can be the difference between stagnation and strategic breakthrough.

Trying to solve systemic problems with reductionist tools is like tightening bolts on a machine that isn't even plugged in. At best, it leads to suboptimal results. At worst, it triggers a full systems backfire - the harder you push, the more resistance you generate.

It's like the logic of addiction: treating a short-term symptom with a solution that worsens the root cause over time. The more you lean on behavioral targeting or short- cycle metrics to patch over deeper marketing misalignment, the more you entrench a long - term issue: erosion of trust, diminishing returns, audience fatigue.

Reductionist thinking narrows your field of view. It misses the leverage points - those strategic fulcrums where small, well-placed actions unlock major positive change.

Systems Thinking invites you to zoom out, to map connections, to feel the rhythms of cause and consequence. It's like stepping back from straining against a brick wall—only to notice the door that's been open the whole time.

As explained in [Systems Thinking in Marketing](#), piecemeal tactics create fragmented results. Truly effective strategy integrates:

- Listening systems that reveal evolving market beliefs.
- Thought leadership models that elevate audience thinking.
- Pull - based ecosystems that guide prospects toward insight and alignment.
- Reaching a critical mass of prospects without creating negative sentiment.

Respectful, organic and privacy-friendly paid reach - via "[White Hat](#)" [SEO \(search engine optimization\)](#), organic AI optimization, contextual paid placement, influencer partnerships, and ethical sponsorships - can amplify this approach without violating trust and risking the brand reputation damage that can come from being associated with privacy - invasive data harvesting.





Using Systems Thinking to Pierce the Veil of the Real Nature of the Digital Ecosystem

To fully appreciate why respect belongs at the core of digital outreach, we must first understand the nature of the system we're influencing. As Ackoff emphasized, it's a category error to treat a *social system* like a *mechanical system*.

In mechanical systems—like engines or assembly lines - components have no purposes of their own. They exist to serve the singular function of the whole. If a marketer assumes people will predictably behave like components - responding in fixed ways to targeted data inputs - they are operating under this outdated paradigm.

That's what happens with invasive data harvesting and behavioral targeting: it assumes deterministic control where none exists.

But the digital ecosystem is not mechanical. It's a *social system* made up of purposeful, autonomous human beings - each with distinct goals, values, and beliefs.

Prospects, customers, and audience members are not passive "targets." They are active participants. And systems like this behave very differently: their parts (people) change the system by acting on their own purposes, adapting, resisting, or aligning based on what they find meaningful.

Trying to force outcomes in such systems—treating humans as algorithms to be hacked - leads to systemic breakdowns: distrust, ad blindness, and a slow erosion of brand equity.

Respectful Reach, by contrast, honors the system's true nature. It recognizes that influence must be earned through empathy, empowerment, and relevance. Instead of coercion, we offer clarity. Instead of tracking people, we attract them - by amplifying content that helps them make smarter choices, in channels that meet them where they are.

In this view, your business, its media, its audience, and its customers form an interdependent system - alive, dynamic, and guided by values. By choosing amplification methods that respect autonomy and serve purpose, we align with the system's natural flow.

This alignment is the key to sustainable marketing influence in a post-surveillance era.





Reframe 1: What if We Began Where Our Prospects Are: In Active Online Research Ahead of a Purchase?

By listening for [deep insights](#) through long - tail keywords, conversation analysis, and unmet values mapping, you uncover what your audience is really trying to learn. This is the *learning pull* that precedes the *purchase pull* of customer demand and sales - and great marketing begins by aligning with that pull, not overriding it.

Consider this evidence of the number of prospects engaged in the *learning pull* that can be served by intelligent thought leadership marketing:

81% of Retail Shoppers Conduct Online Research Before Buying

[A study by GE Capital Retail Bank](#) found that a significant majority of retail consumers begin their purchase journey with online research.

83% of U.S. Shoppers Use Online Search Before Visiting a Store

According to a [Google/Ipsos Global Retail Study](#), the vast majority of shoppers who visited a store in the prior week used online search beforehand.

88% of Shoppers Research Online Before Making a Purchase

Data from [Clerk.io](#) reveals that nearly nine in ten shoppers conduct online research before completing a purchase—highlighting the central role digital content plays in the buying process.

These statistics underscore the importance of aligning marketing strategies with consumers' research behaviors. By *initiating engagement at the [research phase](#)* - rather than trying to intercept it later - businesses can build trust and offer meaningful value. This perfectly aligns with the [Thaut Process](#)'s emphasis on respectful, thought leadership - based marketing: meeting your audience at the moment of learning pull and becoming a trusted source of clarity and direction.





Respect Is Not Just Ethical—It’s Strategic

Through understanding the Audience Attunement methods outlined in [5 Steps to Market Insight](#), it becomes clear that customers don’t start with your brand. They start with questions, with curiosity, with a learning journey.

Yet most marketing funnels ignore that. They attempt to shortcut trust by forcing attention.

The Shift: From Data Targeting to Audience Listening

Respectful marketing—especially when rooted in Strategic Thought Leadership—reframes the entire model.

| | Data Targeting | Audience Listening |
|--|--|--|
| <i>Perspective</i> | Top Down | Outside - In |
| <i>Direction</i> | Push with Interruptions | Respond to Pull for Learning |
| <i>Prospects' Attention Intention for Prospects Information</i> | Involuntary | Voluntary |
| | Target | Serve and Lead |
| <i>Expectation for Prospect Level of Influence</i> | Past Behaviors and Demographics | Insight into Higher Level Thinking |
| | Repeat Patterns | Grow to New Learning |
| <i>Creativity</i> | Behavioral | Higher Level - Values and Mental Models |
| | Low - Past behavior expected to repeat | High - Co - developing a creative vision |

As per the above table, this shift means not only avoiding ethical landmines, but also driving deeper influence, stronger audience relationships, and greater differentiation.





The Strategic Opportunity

“What if your marketing didn’t have to choose between integrity and effectiveness?”

What if you can have both large-scale marketing reach and a customer-respectful approach?

What if - in today’s privacy-conscious world - *you need **both** to win?*

It’s not about abandoning paid reach. It’s about aligning scale with customer respect from the first touch point of prospects’ journeys to becoming paying customers.

I aim to make the case that large scale placement doesn't have to come at the cost of harvesting your potential customers’ personal data.

Why is this so important now?

If brands continue treating people as data points - ignoring mounting resistance to data harvesting—there will be a breaking point. Consumers are increasingly aware, empowered, and ready to walk away from brands that betray their trust.

Fortunately, scalable paid reach methods now exist that respect your customers’ point of view. These approaches help you reach more prospects while serving their learning needs - creating deeper rapport, trusted relationships, and higher long - term profitability.

It’s not about targeting customers. It’s about *listening to their learning pull*—and

1. Aligning with them to target what they want – more empowerment to extract more value from a product or service category and make smarter purchase decisions when buying.
2. Getting in front of them with paid reach methods that don’t require knowing anything about them.





Reframe 2: What if We Can Scale Up with Paid Reach That Also Respects Prospects' Privacy?

The second major shift in respectful marketing is recognizing that paid reach doesn't have to come at the cost of integrity, pushback, negative PR, or negative market sentiment.

Traditional data - driven ad platforms rely on behavioral surveillance to deliver targeted impressions - but that approach is increasingly misaligned with both consumer sentiment and long - term brand health. It treats people like data points, not decision-makers.

Fortunately, thanks to emerging alternatives in contextual advertising, opt - in content sponsorships, and values - aligned influencer platforms, **it's now possible to amplify your message without harvesting your audience's personal information.**

These methods not only sidestep ethical pitfalls - they can create stronger trust, more meaningful attention, and longer - lasting relationships.

As the THAUT Process emphasizes: it's not about avoiding paid media, it's about elevating it to serve prospects' and audience members' insight, empowerment, and authentic learning.

When used this way, paid reach becomes a tool of service, not intrusion.

Following is a list of paid - reach resources that respect the end user while enabling reaching prospects at scale efficiently.

Most of these could be utilized by a privacy - centric digital agency or Strategic Thought Leadership Consulting/Training/Marketing Agency that takes a whole - system marketing view and draws from and manages the paid reach resources relevant to a particular brand's growth potential.





Ethical Paid Reach Platforms

This list outlines a range of privacy - friendly, end - user - respectful advertising channels and partners that align with the THAUT Process and the Audience Effect. These resources offer scalable, effective alternatives to surveillance - based advertising while also supporting long - term trust, brand equity, and thought leadership influence.

1. Contextual Advertising Specialists

- StackAdapt – Contextual targeting with brand - safe programmatic options – <https://www.stackadapt.com/>
- GumGum – Contextual intelligence using computer vision and NLP – <https://www.gumgum.com/>
- Peer39 – Cookie - free contextual targeting layer for DSPs – <https://www.peer39.com/>
- The Media Trust – Digital environment compliance and brand safety – <https://themediatrust.com/>
- Brave Ads – Opt - in browser - based ads with no data leakage – <https://brave.com/brave - ads/>

2. Privacy - Respecting Search Sponsorships

- DuckDuckGo Ads – Search ads via Microsoft Advertising with no profiles – <https://duckduckgo.com/>
- Brave Search Ads – Privacy - first contextual search advertising – <https://brave.com/search/>
- Ecosia Ads – Eco - friendly search advertising powered by Bing – <https://ecosia.org/>

3. Values - Aligned Influencer Marketing Agencies

- Sway Group – Authentic influencer vetting and campaign alignment – <https://swaygroup.com/>
- Obviously – Ethical influencer partnerships with transparency – <https://obviously.ly/>
- Viral Nation – Includes division for cause - driven influencer campaigns – <https://www.viralinaction.com/>
- Influencity – Influencer management with value - based filtering – <https://influencity.com/>





- GRIN – Influencer marketing software with deep audience vetting – <https://grin.co/>

4. Creator Economy Media Buying & Sponsorship Matchmakers

- Paved – Newsletter and blog sponsorships with transparent metrics – <https://www.paved.com/>
- Podcorn – Marketplace for sponsoring aligned podcasts – <https://www.podcorn.com/>
- Passionfroot – Sponsorship platform for mission - driven creators – <https://www.passionfroot.me/>

5. Ethical Ad Networks & Alternatives

- EthicalAds – Contextual ad network with no tracking – <https://ethicalads.io/>
- Carbon Ads – Tasteful ad placement in developer and design communities – <https://www.carbonads.net/>
- BuySellAds – Curated ad placements in respected digital media – <https://www.buysellads.com/>





Reframe 3: What if Our Best Path to Market Leadership is Teaching AI to Lead Our Audience?

Artificial Intelligence is the new discovery engine of the internet.

AI isn't the future - it's the now. With playback loops of discovery powered increasingly by AI, the reality is clear:

- Consumers are learning *about* us before they ever visit our site.
- Most searches end in answers delivered directly by AI—no clicks, no site visits.
- AI isn't just assisting discovery—it *is* discovery.

And this shift changes EVERYTHING about how market leadership is earned.

- **AI search referrals surged +1,300% in the 2024 holiday season**, compared to the prior year—driving users who spend 8% more time, view 12% more pages, and bounce 23% less [Semrush+5Smart Insights+5Barron's+5The Verge+1SentiSight.ai+1](#).
- **13 million U.S. users relied primarily on generative AI for online searches in 2023**, projected to exceed 90 million by 2027 [Semrush](#).
- **71.5% of consumers are using AI tools for search**, with 14% using them daily [Search Engine Land+1GWI+1](#); and **51% of global consumers want AI to help them discover products faster** [EMARKETER](#).
- **Over 58% of U.S. Google searches are now “zero-click”**, meaning users get what they need from AI summaries without ever visiting a website [GWI+2Break The Web+2Barron's+2](#).

As the AI era reshapes discovery, trust, and influence, a new frontier emerges—not just about “getting seen,” but about leading thinking. This is where Strategic Thought Leadership (STL) and schema converge to offer not just AI marketing *with* us, but *for* us.



We are shifting from keywords to *semantic, structured storytelling*.

From targeting people to *targeting what they want to learn* – and giving it to them in ways they couldn't have expected.

AI is now crawling for clarity - not just content.

It is seeking *structured meaning* that aligns with high-trust, high-value models.

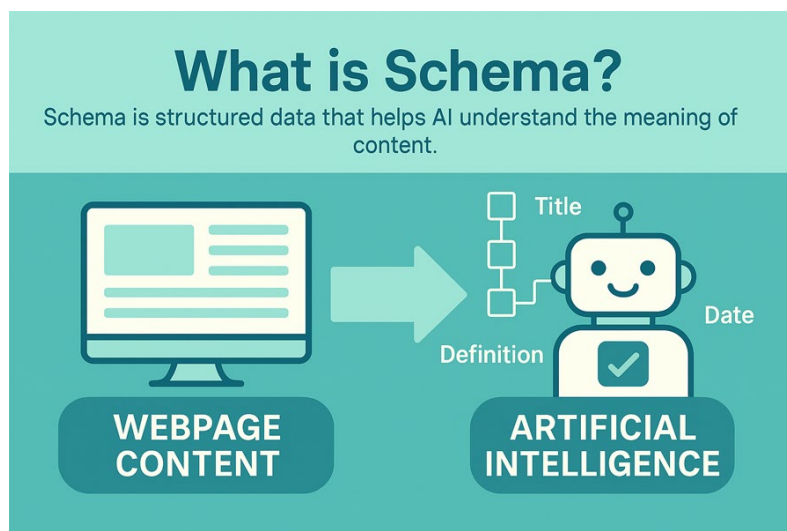
Schema is how we give AI the meaning that STL has organized into *purpose*.

Schema + STL = Magnetic Marketing

- **Schema** structures your ideas so AI can *see* and *share* them.
- **STL** ensures those ideas lead the market to the *better perspective* of your [Thought Leadership Model](#) - and, thus, a better outcome.

Together, they allow us to:

- Pace the audience's learning journey with *well-structured narratives*.
- Make our ***model-shifting content*** easy for AI to surface as answers.
- **Build market leadership** through using AI to persuade the audience to adopt our *Thought Leadership Positions* for their benefit ... and yours..





Strategic Schema vs. Technical Schema

Most websites stop at technical schema—marking an article as an “Article.”

But Strategic Thought Leadership, in how it brings a structure to thought leadership, enables **strategic schema**: for example, embedding:

- Mental model shifts (DefinedTerm, ClaimReview),
- Support Points (Quotation, SupportingData)

to create semantic bridges across the *Audience Baseline Position* - how your audience currently thinks about your category, drilled down to one particular mental model - and your *Thought Leadership Position* – the better, more empowering mental model you are leading your audience to that also favors your offering..

This is how our ideas “live” in the minds of both AI and our audience. It’s how marketing becomes magnetic—aligning ethical influence, empowerment, and visibility.

The future is not about out-shouting competitors. **It’s about out-structuring and out-serving them - with content that AI and humans alike want to amplify.**

In a media environment dominated by zero-click searches and conversational interfaces, **STL + Schema isn’t just an upgrade—it’s the new baseline.**

Big Picture: Why Embed Strategic Thought Leadership into Schema?

- **Search engines increasingly use semantic structure** to understand content purpose, not just keywords.
- By marking **Thought Leadership Positions** as the *core idea* and **Support Points** as *supportive reasoning, examples, or reframes*, you're helping:
 - Crawlers extract context for featured snippets
 - AI agents (e.g., SGE, Bing Copilot, Claude) understand **strategic narrative structure**
 - Your analytics and personalization engines (like future TLA tools) map **behavior to meaning**

It also supports the **Respectful Reach** model by allowing value-driven positioning to be **machine-readable**.





Put your **Thought Leadership Positions, Supporting Talking Points (AKA Support Points)** , and **Thought Leadership Models** in predictable Structured Schema containers, and Chat, voice AI, and AI-Enhanced Search may begin using them in future responses to your prospects.

How?

(1) embed Audience Baseline Positions (ABPs) and Thought Leadership Positions (TLPs) via structured properties like `about`, `hasPart`, `educationalAlignment`;

(2) highlight credibility markers (e.g., `Person`, `Organization`, `CreativeWork`); and

(3) establish authority with references to manifestos, podcasts, books, and other anchor content.



What This Enables

| Capability | Supported by Schema? | Benefits |
|--------------------------------|--------------------------------------|--|
| Declare TLP as core of a page | ✔ DefinedTerm, Claim | Signals topic gravity |
| Identify SPs and classify them | ✔ Comment, Quotation, SupportingData | Links reasoning to positions |
| Highlight quotes + citations | ✔ Yes via Quotation | Rich snippets, AI extractability |
| Enable screenless delivery | ✔ Via SpeakableSpecification | AI-read TLPs |
| Aid TLA tooling and mapping | ✔ (if you parse the schema too) | Correlate page sections to belief shift journeys |





🧠 What's Needed in terms of Process:

Schema Leveraged for Strategic Thought Leadership

| Feature | Description | Value |
|---|---|--|
| Strategic Schema Strength Analysis | Assesses how well the schema aligns with entity goals (e.g., visibility, differentiation, narrative control) | <i>Identifies underutilized schema types, missed connection points (e.g., knowsAbout, founder, audience, offers, author relationships)</i> |
| Schema Storytelling | Translates schema into natural language story to evaluate whether it conveys the right model of the brand/thought leader | <i>Bridges data and brand voice. Shows how your entity appears to AI or search engines</i> |
| Schema vs. Strategic Positioning Audit | Compares schema to thought leadership model (TLP/ABP) structure | <i>Shows which ideas, values, or models are expressed in structured data and which are missing</i> |
| Thought Leadership Schema Mapping | Visual map of schema types used, connected concepts, and the mental model they implicitly project | <i>Helps guide evolution of model through metadata</i> |

In Conclusion: A New Kind of Reach for a New Kind of Customer

These three reframes offer more than a set of tactics – they're a fundamental shift in how we approach marketing and influence in an AI-shaped, privacy-conscious world:

- **Reframe 1** reminds us to start where our prospects already are: in a state of *active learning*.
- **Reframe 2** invites us to expand our visibility *without invading privacy*. The path to scale doesn't have to come at the cost of trust.
- **Reframe 3** reveals the emerging truth that **AI is now the front line of discovery** - and the best way to reach the right audience is to *teach the AI* how to represent us. By combining **Strategic Thought Leadership** with **schema**, we don't just market *with* AI—we empower AI to market *for* us, ethically and effectively.

Together, these reframes offer a vision of marketing that respects the audience, scales with integrity, and builds sustainable market leadership.





Blind Spots in Marketing: Missing the Cookie Line

In Woody Allen's "Small Time Crooks," a group of bumbling thieves hatch a plan to tunnel into a bank vault in the shining steel canyons of Manhattan. They need a front business so they can drill underground. Woody's wife bakes great cookies so they open a humble cookie shop.

Toiling away at burrowing in the basement, rupturing water mains, they are oblivious to the line of customers stretching around the block in a fog of spice laden cookie smells.

They missed the cookie line.

Are you?

Following customers with ads gives them a distaste for a brand because they know they are being studied and treated as objects. Conversely, putting their needs first by listening to and serving their learning needs gives them positive feelings about your brand—and makes marketers and business leaders better about it, too.

Just as the Systems - Thinking based Vanguard Method of the UK demonstrates how designing service systems from the customer's point of view leads to breakthroughs in both cost savings and profits, this principle applies to digital presence as well.

When you zoom out and look at the larger system, invasive marketing acts like the pythons devastating the Everglades - consuming trust and disrupting the natural flow of customer decision - making.

Just as healthy ecosystems rely on balance and transparency, so does the marketing environment. When brands pollute attention with surveillance, the system collapses.

Economic flow breaks down when respect is absent. The end user funds the system - and they increasingly resent being treated as data points.

And like in personal relationships, spying on someone reveals a lack of self-trust. In marketing, it betrays a lack of confidence in your offering. Why not instead lead with respect and empowerment?

This is the real opportunity.

Chris McNeil

chris@thaut.io [LinkedIn](#)

host of [Thought Leadership Studio podcast](#)

creator of the [Thaut Process of Strategic Thought Leadership](#)

author of the upcoming, industry-defining book [Strategic Thought Leadership](#)



EXHIBIT D

**SC SUPREME COURT
INTERIM POLICY ON THE USE OF GENERATIVE
ARTIFICIAL INTELLIGENCE**

The Supreme Court of South Carolina

Re: Interim Policy on the Use of Generative Artificial
Intelligence

Appellate Case No. 2025-000043

ORDER

In response to the increasing use of artificial intelligence systems in legal research and applications, and in recognition of the potential benefits and risks in utilizing this new technology within the South Carolina Judicial Branch, I find it necessary to issue this Interim Policy regarding the appropriate use and limitations on the use of generative artificial intelligence tools and systems by the judiciary and court personnel. This policy seeks to ensure the responsible and secure integration of these technologies into the judiciary, while safeguarding the integrity of judicial proceedings and protecting the privacy and rights of parties and others involved in matters in all courts in the Unified Judicial System.

(a) Application. This Interim Policy applies to all Judicial Officers and Employees of the South Carolina Judicial Branch. Judicial Officers and Employees includes Justices, judges, attorneys, law clerks, administrative assistants, interns, externs, temporary employees, paralegals, and all other employees or volunteers within the Branch regardless of whether they are compensated by state or local funds, including information technology professionals.

(b) Definitions.

(1) "Artificial Intelligence" or "AI" refers to technologies or software that enable computers and machines to perform tasks that typically require human intelligence. These tasks include, but are not limited to, natural language processing, predictive analytics, and machine learning.

(2) "Generative AI" refers to AI tools capable of creating new content or data, such as text, images, audio, video, or code, based on user prompts. Generated or created content may be comparative to what a human creator produces and can include text consisting of entire narratives of naturally

reading sentences. Examples of these programs include, but are not limited to, ChatGPT, Microsoft 365 Copilot, Grok, Gemini, Meta Chat, and Westlaw's AI-Assisted Research and/or CoCounsel.

(c) Use of Generative AI by Judicial Branch Officers and Employees.

(1) Generative AI has the potential to enhance productivity by assisting with various tasks, including drafting documents, editing text, generating ideas, and developing software. However, the use of Generative AI to perform these tasks creates potential risks. These risks include that generated content may contain inaccuracies, bias, cybersecurity vulnerabilities, and unauthorized use of intellectual property. Content created by Generative AI and the public availability of information submitted to an AI program may also pose security or privacy concerns.

(2) Judicial Branch Officers and Employees may only use Generative AI tools and systems in the performance of their Judicial Branch duties that are approved by the Supreme Court or South Carolina Court Administration.¹ Notwithstanding any general approval, supervising justices, judges, lawyers, and information technology professionals retain the authority to limit or prohibit the use of approved Generative AI tools by lawyer and nonlawyer employees under their supervision.

(3) Any Generative AI tools or systems used in the performance of Judicial Branch duties may only be accessed using approved devices. Judicial Officers and Employees may not circumvent this rule by using Generative AI on personal devices or systems.

(4) Judicial Branch Officers and Employees may not use Generative AI to draft memoranda, orders, opinions, or other documents without direct human oversight and approval. Generative AI tools are intended to provide assistance and are not a substitute for judicial, legal, or other professional expertise. As such, content from Generative AI may not be used verbatim;

¹ Generative AI tools and systems that are procured, purchased, or otherwise made available to Judicial Branch Officers and Employees by the Branch are deemed approved for use. Judicial Branch Officers and Employees who have questions about specific tools and systems should contact South Carolina Court Administration.

be assumed to be truthful, reliable, or accurate; be treated as the sole source of reference; or be solely relied on in making final decisions.

(5) In addition to assisting Judicial Officers and Employees in legal matters, Generative AI may be used to create or modify software code. Such use may only be permitted after identification and mitigation of business and security risks related to its use. All software code generated by Generative AI must be documented.

(6) Neither AI nor Generative AI tools and systems may be used to process or analyze confidential court records or privileged information or communications unless expressly authorized and in compliance with all applicable rules and policies, including the Judicial Branch Acceptable Use Policy and the Information Security Governing Policy, as well as any similar applicable policies established by other South Carolina governmental entities.

(7) The South Carolina Judicial Branch will develop training programs to educate Judicial Officers and Employees on the proper and improper use of AI and Generative AI.

(8) Judicial Officers and Employees are subject to appropriate corrective action, including disciplinary measures when justified, to remedy any violations of this Interim Policy.

(d) Use of AI by Lawyers and Litigants in Matters.

(1) While this Interim Policy does not specifically address the use of Generative AI by lawyers and litigants, lawyers and litigants are reminded that they are responsible to ensure the accuracy of all work product and must use caution when relying on any output of Generative AI.

(2) Lawyers in particular must ensure that the use Generative AI does not compromise client confidentiality or otherwise violate the South Carolina Rules of Professional Conduct, Rule 407, SCACR.

(e) Ongoing Evaluation and Future Policy Development. This Interim Policy shall remain in effect until further Order of the Chief Justice or the Supreme Court.

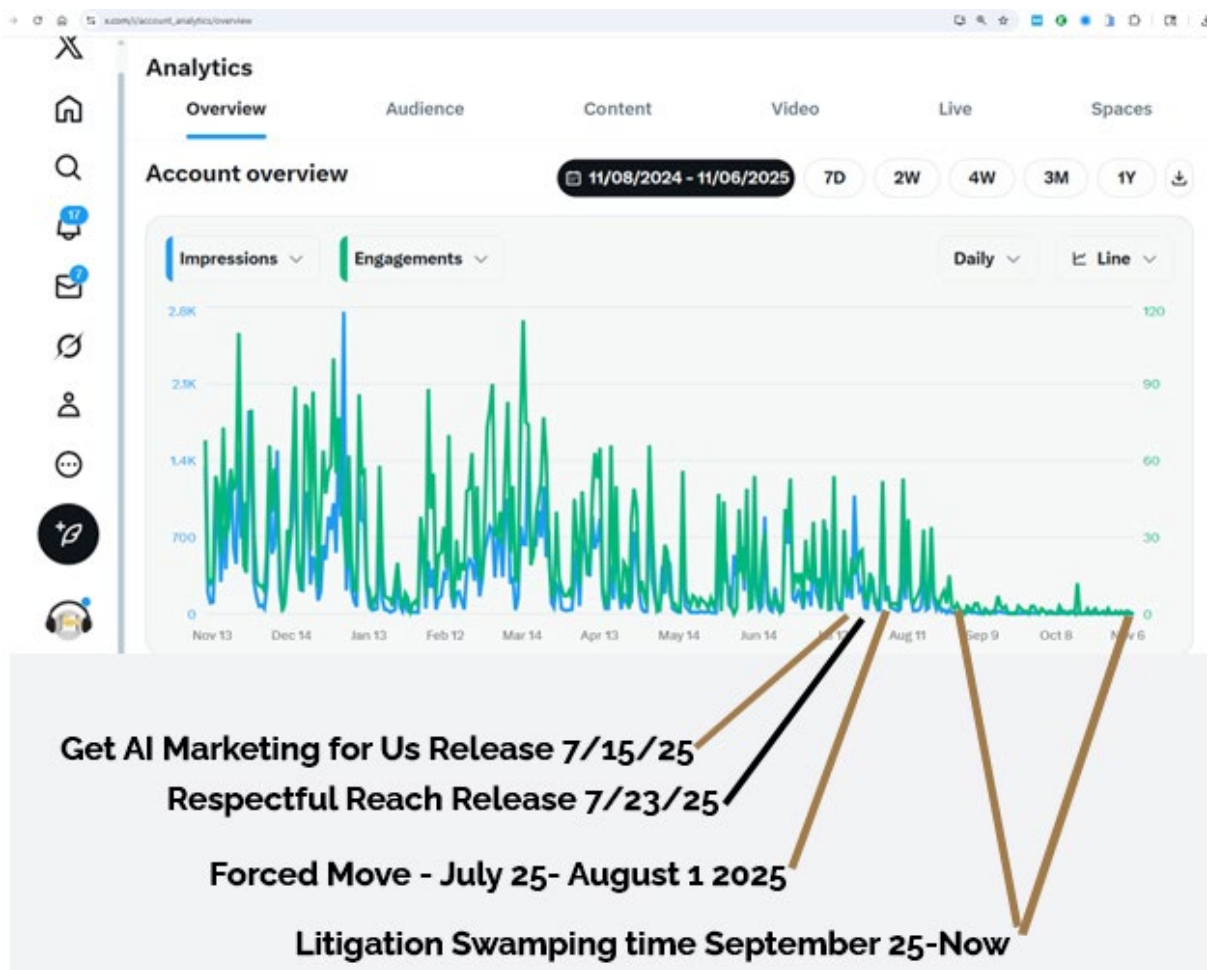
s/John W. Kittredge
John W. Kittredge
Chief Justice of South Carolina

March 25, 2025
Columbia, South Carolina

EXHIBIT E

**PLATFORM DROPOFF SHOWING HALT OF
STRATEGIC THOUGHT LEADERSHIP PLATFORM
VELOCITY AND EXPLOITATION OF PLAINTIFF
TIME RESOURCES**

Thought Leadership Studio X (Twitter) Account Analytics show “Flatlining” upon forced moved and litigation time pressures

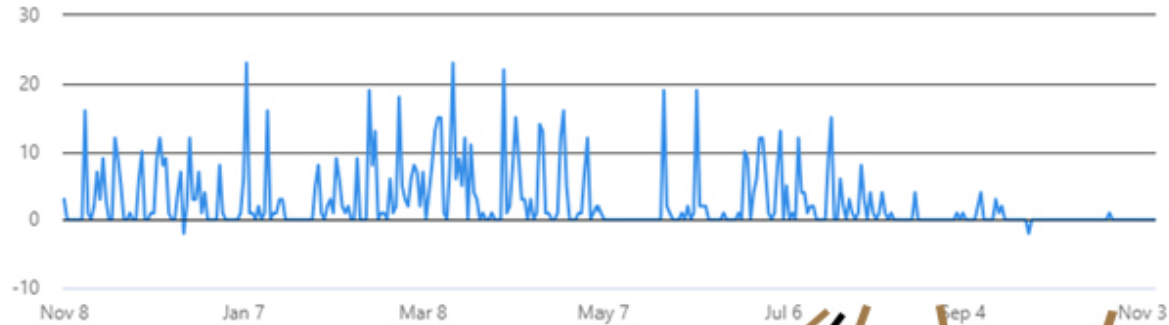


Plaintiff McNeil LinkedIn Account Analytics also show steep drop upon forced moved and staying nearly nonexistent during continued litigation

Content performance ⓘ

933 Engagements

Daily ▾



Get AI Marketing for Us Release 7/15/25

Respectful Reach Release 7/23/25

Forced Move - July 25- August 1 2025

Litigation Swamping time September 25-Now

EXHIBIT F

DEFENSE COUNSEL COMMUNICATIONS DEMONSTRATING PATTERN OF INTIMIDATION AND RULE 4.3 VIOLATIONS

Introduction

The following exhibit presents defense counsel's communications to Plaintiffs with annotated analysis demonstrating:

1. violations of S.C. Rule of Professional Conduct 4.3 through improper legal advice to unrepresented adverse parties;
2. systematic use of condescending language designed to undermine pro se confidence;
3. false assumptions about pro se capabilities contradicted by Plaintiffs' documented litigation history; and
4. coordination of intimidation tactics across defense firms.

These communications provide context for SAC 181's current AI motion, which continues the pattern of attributing pro se sophistication to improper assistance rather than recognizing documented capabilities.

Communication 1: Joint Voicemail from O'Brien and Tate (October 31, 2025)

TRANSCRIPT:

Hi, we're calling for Chris McNeil. This is attorneys Kevin O'Brien and Justine Tate at the Phelps Dunbar Law Firm. We're calling about obviously, your pro se lawsuit, McNeil versus SAC 180 1 et. All. Wanted to talk to you about a few things now that we have our *motion to dismiss* and chat on a few things. We did send an email before about possibly talking, but it seems that it's a good time now. If you have time today to give us a call back, please do so. You can call either my office direct dial or Justine's. Mine is 7 8 9 5 3 0 2 7 8 9 5 3 0 2. Justine is 9 1 9 7 8 9 5 3 1 1. If you are unavailable for the rest of the day today, it's just short of 3:30 here on Friday, please give us a call on Monday the third. Thank you and we'll look forward to talking with you.

ANALYSIS:

Attorneys O'Brien and Tate leave joint voicemail on October 31, 2025 (3:30 PM), wanting to "chat on a few things" regarding their Motion to Dismiss filed October 29, 2025.

Critical Omission: The voicemail makes no mention of SAC 181's discovery responses due November 7, 2025, (served October 3, 2025).

Pattern Revealed: Defense counsel have time to request informal discussion of their own motions, but not time to respond to properly served Interrogatories and Document Requests. This priority inversion - discussing our motions while ignoring our discovery - characterizes defendants' entire litigation approach.

Coordination: Joint voicemail from two attorneys suggests coordinated communications strategy, indicating that Ms. Tate's subsequent November 3 "warnings" email was part of planned approach rather than spontaneous professional courtesy.

Compare to actual conduct: When Plaintiff responded via email on November 3, 2025, affirming the need for "complete, truthful, and non-evasive responses" to discovery, Ms. Tate responded with condescending warnings about Rule 11, emergency motions, and AI usage - but still no discovery responses.

Communication 2: Tate Email "Warnings" (November 3, 2025)

FROM: Justine Tate, Phelps Dunbar LLP

TO: James McNeil, Meaghan Poyer

DATE: November 3, 2025

RELEVANT EXCERPTS WITH ANALYSIS:

EXCERPT 1 - Rule 11 "Warning":

"We would caution the continued and purported use of SCRPC Rule 11 allegations in motions and pleadings when it is not a rule that you understand and has very particular consequences."

RULE 4.3 VIOLATION:

This statement gives legal advice to unrepresented adverse parties about how to handle Rule 11 issues. S.C. Rule of Professional Conduct 4.3 specifically prohibits attorneys from giving legal advice to unrepresented persons when "the lawyer knows or reasonably should know that the interests of such a person are or have a reasonable possibility of being in conflict with the interests of the client."

CONDESCENDING ASSUMPTION:

The phrase "a rule that you understand" (emphasis added) assumes incompetence based solely on pro se status. This assumption is factually false and demonstrably wrong.

CONTRADICTED BY DOCUMENTED HISTORY:

Mr. McNeil successfully utilized Rule 11 principles during 2020-2021 pro se litigation against SAC 181, Comcast, Dominion Energy, and Roadstead Management (Case No. 2021-CP-10-02237). That litigation—which included sophisticated motion practice comparable to the current case—occurred before ChatGPT (launched November 2022) or Claude (launched March 2023) existed, making any AI-based explanation chronologically impossible.

IMPLICIT THREAT:

The reference to "very particular consequences" is designed to intimidate Plaintiffs into abandoning legitimate Rule 11 arguments rather than pursue sanctionable conduct by defendants.

EXCERPT 2 - "Emergency Motion" Discouragement:

"We caution you and Ms. Poyer labeling filed motions as 'emergency' motions. We are confident that the Court does not view your motions as an 'emergency.' This is a very specific designation saved for unique and particular circumstances, including grave risk to life and limb."

RULE 4.3 VIOLATION:

This is legal advice about procedural designations, delivered by opposing counsel whose client's interests directly conflict with Plaintiffs'. The implicit message - "don't use emergency procedures" - serves defendants' interests (delay of evidence preservation) while harming Plaintiffs' interests (protecting evidence from destruction).

FALSE CERTAINTY:

Ms. Tate's profession of "confidence" about how the Court views Plaintiffs' motions is speculation stated as fact. Only the Court determines whether evidence preservation constitutes an emergency requiring expedited consideration.

STRATEGIC PURPOSE:

This "caution" discourages Plaintiffs from seeking expedited relief for evidence preservation while defendants' AppFolio syndication records, postal documentation metadata, and platform upload histories remain at risk of destruction. Defense counsel spend time cautioning Plaintiffs about procedure rather than preserving the evidence Plaintiffs seek.

EXCERPT 3 - AI Usage "Caution":

"We caution that AI generated documents and any attempted use of AI generated information or legal analysis or use of verbiage in the legal profession are not always correct/accurate. Thus, we further caution your and Ms. Poyer's use of AI generated information in papers filed with the Court."

RULE 4.3 VIOLATION:

This is legal advice about research methods and filing preparation, designed to undermine Plaintiffs' confidence in their own legal work. The implicit message - "don't trust your own research and analysis" - serves defendants' interests while harming Plaintiffs' ability to prosecute their case effectively.

IRONIC IGNORANCE OF PLAINTIFF'S ACTUAL EXPERTISE:

Ms. Tate lectures Plaintiffs about AI limitations without knowing that Mr. McNeil's professional background includes:

- Strategic consulting on AI implementation
- Direct programming work with AI APIs
- Development of systems using strategic schema markup to train AI models as advocates for specific thought leadership positions

Her assumption that she needs to educate Plaintiffs about AI reveals profound unfamiliarity with Plaintiffs' actual expertise in this domain.

FOUNDATION FOR CURRENT AI MOTION:

This "caution" preview the condescending assumptions underlying SAC 181's current AI motion: that sophisticated pro se work must reflect AI assistance rather than human capability. Both the email and the motion rest on the same false premise—that pro se parties cannot produce quality legal analysis without improper technological assistance.

CHRONOLOGICAL IMPOSSIBILITY:

As demonstrated by the 2020-2021 litigation against these same defendants (Exhibit [H]), Mr. McNeil produced legal work of comparable sophistication before AI tools existed. Ms. Tate's theory cannot explain this documented history.

Following is the actual email exported as a pdf

From: Justine Tate (5311) <Justine.Tate@phelps.com>
Sent: Monday, November 3, 2025 3:22 PM
To: Kevin O'Brien (5302); chris thaut.io; Alicia Bolyard; C&M McNeil; cmanning@rlattorneys.com
Cc: Kelsi Sigler; Kaylie Stapleton
Subject: RE: Voicemail Regarding McNeil & Poyer v. SAC 181, LLC et al. (Case No. 2025-CP-10-05095)

Hi Mr. McNeil,

We respond to your note below as follows.

First, yes, we are aware of pro se plaintiffs' response opposing our Motion to Dismiss. We filed our Motion to Dismiss in response to the only currently pending pleading on record. Your motion for leave to amend your complaint does not moot our Motion to Dismiss. With regard to your Motion for Leave to Amend, we plan to oppose such motion and believe that the Court will deny it (based upon futility as it would be subject to a motion to dismiss and/or for a more definite statement).

Second, as for discovery purportedly issued by pro se plaintiffs, it is our understanding that, at some point, pro se plaintiffs attempted to issue written discovery to Defendant SAC in this matter. As we advised you in a prior e-mail, it has not been served upon us as counsel of record to date (other than the Requests for Admission issued on 10/31) and thus, we wanted to note that we do not consider any such written discovery served on SAC. It is our further understanding that, at some point in time, such requests were emailed to Mr. Pettis, who is not counsel of record for SAC (and never was) because he never made a notice of appearance in this case. There is also no Certificate of Service reflecting service on us as counsel for Defendant SAC or Defendant SAC's registered agent. Thus, any such e-mail correspondence attempting to serve discovery did not start the 35 day clock. As counsel of record for Defendant SAC, we are happy to accept service of any written discovery pro se plaintiffs wish to propound on Defendant SAC going forward (in addition to the Requests for Admission), should you elect to do so.

We reached out to you last week to short cut some of these things, but if you and/or Ms. Poyer do not wish to chat with us, so be it. Below is what we planned to discuss.

1. We would caution the continued and purported use of SCRPC Rule 11 allegations in motions and pleadings when it is not a rule that you understand and has very particular consequences.

2. We caution you and Ms. Poyer labeling filed motions as “emergency” motions. We are confident that the Court does not view your motions as an “emergency.” This is a very specific designation saved for unique and particular circumstances, including grave risk to life and limb. That is not the case here. We are certain that a Court not only would agree with us, but also does not take kindly to such an overuse of this designation. Please consider this our good faith conference on the issue. We request that you withdraw all alleged motions that have been labeled as “emergency.” If you choose not to do so, and we reserve all rights to seek appropriate recourse (or the Court may act on its own).
3. We are not prepared to discuss any potential settlements at the policy limits or above those limits for many reasons, but, namely, there is absolutely nothing to suggest that pro se plaintiffs’ claims are valued anywhere near the policy limits in this case, irrespective of any purported “jury risk analysis” you may have presented. We do not agree with this analysis, nor have we seen any such analysis in our legal research. In that regard, please understand that some of the documents you have had created (we expect from AI) and some of the jargon you are using thinking that it is common amongst lawyers in the area are not actually documents and/or jargon used.
4. In that at regard, we caution that AI generated documents and any attempted use of AI generated information or legal analysis or use of verbiage in the legal profession are not always correct/accurate. Thus, we further caution your and Ms. Poyer’s use of AI generated information in papers filed with the Court. We also encourage you to research what has happened to lawyers in this profession who have used AI generated research and information in their filings and the ramifications the Court has imposed as a result. We intend to ask the Court to require certifications regarding any use by anyone in this case of AI for anything filed with the Court or served under the Rules of Civil Procedure.

If, upon reading this, you have changed you mind and would like to or are willing to talk, we would still be happy to discuss these issues and try to streamline things. If not, you have been advised of the above outline of issues we intended to discuss.

Thanks,

Justine

Justine M. Tate

Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612

Direct: 919-789-5311
Fax: 919-789-5301
Email: justine.tate@phelps.com

Please note our recent change of address.



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From: chris thaut.io <chris@thaut.io>
Sent: Monday, November 3, 2025 12:58 PM
To: Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>
Cc: Justine Tate (5311) <Justine.Tate@phelps.com>; Alicia Bolyard <abolyard@rlattorneys.com>; Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>; C&M McNeil <mcneilandpoyer@gmail.com>
Subject: Voicemail Regarding McNeil & Poyer v. SAC 181, LLC et al. (Case No. 2025-CP-10-05095)

Mr. O'Brien,

Thank you for your voicemail message of Friday, October 31, 2025 (received at 3:26 PM), left jointly with Ms. Tate regarding McNeil & Poyer v. SAC 181, LLC et al.

You mentioned the Motion to Dismiss filed on October 29, 2025. I assume you are aware of our October 30, 2025, Response in Opposition and Cross-Motion to Grant Leave to File Second Amended Complaint, which addresses it comprehensively (attached for reference).

Even without the pending Second Amended Complaint, the current Amended Complaint adequately states valid claims against SAC 181 under South Carolina's notice pleading standards, including fraud through agency (Count II; ¶¶37-45), retaliatory conduct (Count IV; ¶¶59-63; § 27-40-910), and negligence via non-delegable duties (Count V; ¶¶14-15, 68-71). The proposed Second Amended Complaint further advances these claims on the merits with additional specificity and evidence. Even if the AC wasn't sufficient, which it is, the 2AC renders SAC 181's Partial MTD and MDS moot under Rule 15(a), SCRCP. Further delay in filing an Answer via these motions appears dilatory absent a strong evidentiary basis and may warrant sanctions under Rule 11 if not grounded in fact or law.

Further, I affirm the need for complete, truthful, and non-evasive responses from SAC 181, LLC in their responses to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents (served October 3, 2025), and the Requests for Admission served October 31, 2025 .

I'm happy to discuss case management issues via email to ensure a clear record for all parties. However, while I appreciate the offer, I do not see a need for a phone call currently, given the reported policy limits and coverage reservations for SAC 181, LLC. Any meaningful settlement discussion with insurance-assigned counsel would require owner-level authorization to discuss parameters above policy limits at the range of JRA5 or higher, especially given that the upcoming JRA6 widens the analysis to systemic conduct patterns with broader implications.

If you have such approval for owner contributions, please confirm in writing, and we can schedule a call. Otherwise, if there are specific procedural matters that you'd like to address, please outline them via email, and I'll respond.

Respectfully,

Chris McNeil

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

Communication 3: McNeil Response (November 3, 2025)

FROM: James C. McNeil

TO: Justine Tate

DATE: November 3, 2025

RELEVANT EXCERPT:

Regarding Your AI-Related Cautions:

I note with considerable irony your concerns about AI usage in legal filings.

My professional background includes not only strategic consulting on AI implementation, but also direct programming work with AI APIs—specifically developing systems that use strategic schema markup to train AI models as advocates for specific thought leadership positions. This includes work on systemic issues such as housing crisis dynamics and policy solutions and Thought Leadership Positions like "Rental property ownership requires responsible stewardship since it involved essential shelter for the vulnerable" to replace old thinking like "Rental properties are just passive investment".

Regarding Other Matters:

We have received your various cautions and positions regarding procedural issues. We will address those as (and if) appropriate.

I will send my detailed response with exhibits and legal authority by 12:00 Noon Wednesday (November 5, 2025).

In the interim, I must attend to client work that has been necessarily delayed while addressing this litigation.

ANALYSIS:

Plaintiff's response demonstrates:

1. **Professional tone** despite provocation
2. **Correction of legal misstatements** with proper authority
3. **Recognition of tactical purpose** behind "warnings"
4. **Sophisticated understanding** of both legal issues and AI technology
5. **Maintenance of focus** on substantive obligations (discovery) rather than procedural distractions

This response—prepared in real-time without AI assistance—demonstrates exactly the legal sophistication Ms. Tate claims requires AI explanation. The quality of immediate response to opposing counsel proves human intelligence and professional capability, not reliance on artificial intelligence tools.

Conclusion

These communications demonstrate a pattern: defense counsel consistently treat pro se sophistication as inherently suspect, attribute quality legal work to improper assistance, and use condescending language to discourage legitimate use of available procedures—all while evading their own substantive obligations.

The current AI motion represents the culmination of this pattern. Rather than respond to discovery about their clients' documented misconduct, defense counsel seek Court investigation of Plaintiffs' research methods based on the same false assumptions these communications reveal.

Following is the actual email exported as a pdf

From: chris thaut.io
Sent: Monday, November 3, 2025 4:40 PM
To: Justine Tate (5311); Kevin O'Brien (5302); Alicia Bolyard; C&M McNeil; cmanning@rlattorneys.com
Cc: Kelsi Sigler; Kaylie Stapleton
Subject: RE: Voicemail Regarding McNeil & Poyer v. SAC 181, LLC et al. (Case No. 2025-CP-10-05095)

Ms. Tate,

Thank you for your November 3, 2025, 3:22 PM email.

Discovery Service to SAC 181, LLC:

Your email states that discovery to SAC 181, LLC "has not been served upon us as counsel of record to date (other than the Requests for Admission issued on 10/31)" and that you "do not consider any such written discovery served on SAC."

Your position is factually incorrect and legally unfounded.

SAC 181, LLC's First Set of Interrogatories and Requests for Production of Documents was properly served on October 3, 2025, thirty-one (31) days ago, to counsel then of record for SAC 181, LLC, in full compliance with the South Carolina Rules of Civil Procedure.

I will provide complete documentation demonstrating this, along with supporting legal authority, by end of business tomorrow (Tuesday, November 4, 2025). This documentation will demonstrate that:

SAC 181, LLC had counsel of record at the time of service;
Service was made in compliance with applicable rules;
Responses are overdue under the applicable deadline; and
Whether Phelps Dunbar received forwarded discovery materials from prior counsel is irrelevant to service validity.

Regarding Your AI-Related Cautions:

I note with considerable irony your concerns about AI usage in legal filings.

My professional background includes not only strategic consulting on AI implementation, but also direct programming work with AI APIs—specifically developing systems that use strategic schema markup to train AI models as advocates for specific thought leadership positions. This includes work on systemic issues such as housing crisis dynamics and policy solutions and Thought Leadership Positions like "Rental property ownership requires responsible stewardship since it involved essential shelter for the vulnerable" to replace old thinking like "Rental properties are just passive investment".

Regarding Other Matters:

We have received your various cautions and positions regarding procedural issues. We will address those as (and if) appropriate.

I will send my detailed response with exhibits and legal authority by 12:00 Noon Wednesday (November 5, 2025).

In the interim, I must attend to client work that has been necessarily delayed while addressing this litigation.

Respectfully,

Chris McNeil

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

From: Justine Tate (5311) <Justine.Tate@phelps.com>
Sent: Monday, November 3, 2025 3:22 PM
To: Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; chris thaut.io <chris@thaut.io>; Alicia Bolyard <abolyard@rlattorneys.com>; C&M McNeil <mcneilandpoyer@gmail.com>; cmanning@rlattorneys.com
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>
Subject: RE: Voicemail Regarding McNeil & Poyer v. SAC 181, LLC et al. (Case No. 2025-CP-10-05095)

Hi Mr. McNeil,

We respond to your note below as follows.

First, yes, we are aware of pro se plaintiffs' response opposing our Motion to Dismiss. We filed our Motion to Dismiss in response to the only currently pending pleading on record. Your motion for leave to amend your complaint does not moot our Motion to Dismiss. With regard to your Motion for Leave to Amend, we plan to oppose such motion and believe that the Court will deny it (based upon futility as it would be subject to a motion to dismiss and/or for a more definite statement).

Second, as for discovery purportedly issued by pro se plaintiffs, it is our understanding that, at some point, pro se plaintiffs attempted to issue written discovery to Defendant SAC in this matter. As we advised you in a prior e-mail, it has not been served upon us as counsel of record to date (other than the Requests for Admission issued on 10/31) and thus, we wanted to note that we do not consider any such written discovery served on SAC. It is our further understanding that, at some point in time, such requests were emailed to Mr. Pettis, who is not counsel of record for SAC (and never was) because he never made a notice of appearance in this case. There is also no Certificate of Service reflecting service on us as counsel for Defendant SAC or Defendant SAC's registered

From: Justine Tate (5311) <Justine.Tate@phelps.com>
Sent: Monday, November 3, 2025 3:22 PM
To: Kevin O'Brien (5302); chris thaut.io; Alicia Bolyard; C&M McNeil; cmanning@rlattorneys.com
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We reached out to you last week to short cut some of these things, but if you and/or Ms. Poyer do not wish to chat with us, so be it. Below is what we planned to discuss.

1. We would caution the continued and purported use of SCRPC Rule 11 allegations in motions and pleadings when it is not a rule that you understand and has very particular consequences.

2. We caution you and Ms. Poyer labeling filed motions as “emergency” motions. We are confident that the Court does not view your motions as an “emergency.” This is a very specific designation saved for unique and particular circumstances, including grave risk to life and limb. That is not the case here. We are certain that a Court not only would agree with us, but also does not take kindly to such an overuse of this designation. Please consider this our good faith conference on the issue. We request that you withdraw all alleged motions that have been labeled as “emergency.” If you choose not to do so, and we reserve all rights to seek appropriate recourse (or the Court may act on its own).
3. We are not prepared to discuss any potential settlements at the policy limits or above those limits for many reasons, but, namely, there is absolutely nothing to suggest that pro se plaintiffs’ claims are valued anywhere near the policy limits in this case, irrespective of any purported “jury risk analysis” you may have presented. We do not agree with this analysis, nor have we seen any such analysis in our legal research. In that regard, please understand that some of the documents you have had created (we expect from AI) and some of the jargon you are using thinking that it is common amongst lawyers in the area are not actually documents and/or jargon used.
4. In that at regard, we caution that AI generated documents and any attempted use of AI generated information or legal analysis or use of verbiage in the legal profession are not always correct/accurate. Thus, we further caution your and Ms. Poyer’s use of AI generated information in papers filed with the Court. We also encourage you to research what has happened to lawyers in this profession who have used AI generated research and information in their filings and the ramifications the Court has imposed as a result. We intend to ask the Court to require certifications regarding any use by anyone in this case of AI for anything filed with the Court or served under the Rules of Civil Procedure.

If, upon reading this, you have changed you mind and would like to or are willing to talk, we would still be happy to discuss these issues and try to streamline things. If not, you have been advised of the above outline of issues we intended to discuss.

Thanks,

Justine

Justine M. Tate

Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612

EXHIBIT G:

**PLAINTIFF'S SEPTEMBER 30, 2021 OPPOSITION TO
PROTECTIVE ORDER DEMONSTRATING PRE-AI
LITIGATION COMPETENCE**

IN THE COMMON PLEAS COURT OF CHARLESTON COUNTY

STATE OF SOUTH CAROLINA

| | | |
|---------------------------------------|---|---------------------------|
| |) | |
| <u>James Christopher McNeil</u> |) | |
| Petitioner/Plaintiff, |) | |
| |) | |
| V. |) | CASE NO: 2021-CP-10-02237 |
| Comcast of Carolinas , |) | |
| Dominion Energy South Carolina, Inc., |) | |
| SAC 181, LLC, and |) | |
| Roadstead Management, LLC |) | |
| |) | |

2021 SEP 30 PM 1:04
 JULIE J. ANASTASIOU
 CLERK OF COURT
 FILED

PLAINTIFF'S OPPOSITION TO DEFENDANTS' JOINT MOTION FOR A PROTECTIVE ORDER OR CONFIDENTIALITY ORDER

INTRODUCTION

The Defendants' Motion for a Protective Order or, in the Alternative, a Confidentiality Order, seeks to prevent the public disclosure of all discovery in this case. With their Motion, The Defendants aim to claim the right to deem what is confidential.

The Defendants' collectively claim, "However, after several attempts to reach an agreement, Plaintiff has been unwilling to consent to a Confidentiality Order." However, Plaintiff has been clear that it is the undue overly broad scope of this Confidentiality Order that is the issue.

Giving the Defendants the right to deem what is confidential with this overly broad order is not consistent with Fed. R. Civ. P. 26(c): "A party asserting good cause bears the burden, for each particular document it seeks to protect, of showing that specific prejudice or harm will result if no protective order is granted."

The need to avoid specific prejudice or harm could be better met by the Defendants having to file separate motions for protective orders for each instance.

BACKGROUND

In this case, The Plaintiff argues that he suffered an electrical shock injury due to the negligence and gross negligence of the Defendants. There is a strong public interest component due to the large scale services some of The Defendants provide that are intertwined with the inherent dangers of potentially lethal voltage in home electrical wiring.

There is a strong precedent for the need for public disclosure in such cases of public interest. To quote Bailey from *Fighting Protective and Secrecy Orders*, as presented at the 1 AAJ 2013 Annual Convention, "Secrecy allows wrongdoing to continue, prevents victims from knowing they may have a viable legal claim, and undermines trust in the justice system."

LEGAL STANDARD

The need for good cause "creates a rather high hurdle," *Baron Fin. Corp. v. Natanzon*, 240 F.R.D. 200, 202 (D. Md. 2006), so the moving party "may not rely upon 'stereotyped and conclusory statements'" to establish good cause.

From *Ex parte Capital U-Drive-It*, 369 S.C. 1, 630 S.E.2d 464 (2006): "Judicial proceedings and court records are presumptively open to the public under the common law, the First Amendment of the federal constitution, and the [Open Courts provision of] the state constitution."

Further, "Broad allegations of harm, unsubstantiated by specific examples or articulated reasoning, do not satisfy the Rule 26(c) test." *Cipollone v. Liggett Group, Inc.*, 785 F.2d 1108, 1121 (3d Cir. 1986) ("*Cipollone II*").

ARGUMENT

1. The Defendants' primary argument is: "By entering such an order allowing Defendants to designate documents deemed to be confidential, Defendants are protected from any potential embarrassment or disclosure of proprietary information".

The Defendants' stated need for secrecy can be adequately addressed by individual orders. Appropriate individual orders will have the support of The Plaintiff. As The Plaintiff recently wrote in an email to the Defendants' representation, "I can be more flexible in agreeing to specific motions for confidentiality that are appropriately limited in scope to avoiding undue embarrassment to specific people who weren't acting with malice or disregard for safety as well as those truly needed to protect trade secrets."

As per *Waelde v. Merck, Sharp & Dohme*, 94 F.R.D. 27, 28 (E.D. Mich. 1981), "Blanket" protective orders require a particularly "heavy burden," that disclosure will create a "clearly defined and very serious injury". The Defendants' Motion clearly does not meet that standard.

2. The Defendants' motion states "Defendants do not seek to prevent Plaintiff from discovery, they simply wish to protect any material or testimony obtained by Plaintiff from being disclosed to the public."

It is not about the ease of discovery for the Plaintiff, it is about the public interest in knowing the safety hazards caused by actions of the Defendants. Backing up and seeing the bigger picture reveals that the court systems' role in corporate accountability requires a degree of

transparency. In *Weiss v. Allstate Co.* (E.D. La. No. 06-cv-3774), Public Justice representing intervenor Consumer Watchdog (then the Foundation for Taxpayer and Consumer Rights) successfully opposed Allstate's request to seal documents in a trial where a New Orleans couple won a \$2.8 million verdict against Allstate for illegally refusing a hurricane-related claim. The district court agreed the trial exhibits provide insight into the company's decision-making process and that denying public access "would directly impede FTCR's mission of educating the public about insurance practices and abuses."

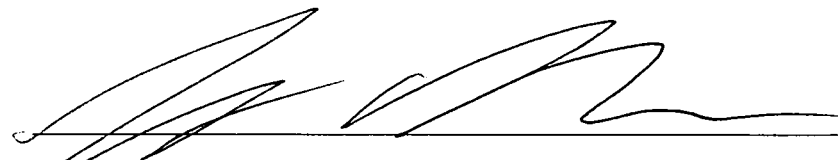
Similarly, such a broad protective order would impede public awareness of scenarios which can lead to broken neutral lines being unattended to due to a lack of adequate proactive electric line fault detection, inadequate grounding in home electrical systems, and the lack of adequate oversight over the installation of internet wiring to ensure it meets electrical safety code standards.

3. The Defendants further state, "A Protective Order or Confidentiality Order would also stop Defendants' need to file individual motions for protection as incidents or sensitive material presents 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.

CONCLUSION

For the foregoing reasons, the Court should deny Defendants' Motion for a Protective Order or Confidentiality Order.



James C. McNeil

9-30-2021

September 30, 2021

IN THE COMMON PLEAS COURT OF CHARLESTON COUNTY

STATE OF SOUTH CAROLINA

| | | |
|---------------------------------------|---|---------------------------|
| |) | |
| <u>James Christopher McNeil</u> |) | |
| Petitioner/Plaintiff, |) | |
| |) | |
| V. |) | CASE NO: 2021-CP-10-02237 |
| Comcast of Carolinas, |) | |
| Dominion Energy South Carolina, Inc., |) | |
| SAC 181, LLC, and |) | |
| Roadstead Management, LLC |) | |
| |) | |

FILED
 2021 SEP 30 PM 1:06
 JULIE J. ARMSTRONG
 CLERK OF COURT

CERTIFICATE OF SERVICE

I, James Christopher McNeil, do hereby certify that I have this day served a copy of the within and foregoing pleading upon all parties to this matter via email and/or USPS to the counsel of record:

Counsel for Comcast of Carolina. Kathy A. Carlsten, Esq and Ryan W. Connor, Esq. Copeland, Stair, Kingma & Lovell, LLP 40 Calhoun St., Suite 400 Charleston, SC 29401 kcarlsten@cskl.law
rconner@cskl.law

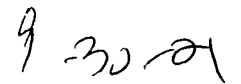
Counsel for Dominion Energy South Carolina, Inc. David S. Cox, Esq 211 King St, Suite 300, Charleston, SC 29401 dcox@barnwell-whaley.com

Counsel for Roadstead Management, LLC Olivia Matte. Wall Templeton Attorneys, PO Box 1200, Charleston, SC 29402 Olivia.Matte@WallTempleton.com

Counsel for SAC 181, LLC Charles R. Norris, Esq. Nelson Mullins, Riley & Scarborough, LLP, 151 Meeting St. 6th floor PO Box 1806 (29402-1806) Charleston, SC 29401-2239 charles.norris@nelsonmullins.com.



James C. McNeil



September 30, 2021