

SC Supreme Court Writ of Mandamus Handling

The Suddenly Missing Extraordinary Writ

McNeil v SAC 181, LLC

Charleston Court of Common Pleas 2025-CP-10-05095 | SC Supreme Court 2026-000919

Contact: Chris McNeil | Plaintiff & Petitioner Pro Se chris@thaut.io | 843.818.3495

Events Table















Date	Event Type	What Happened	Section (Jump to)
April 14, 2026	SC Supreme Court Filing	Petitioners Electronically Filed the Petition for Writ of Mandamus via email (attaching Petition for Writ of Mandamus and Proof of Service)	<u>1</u>
April 15, 2026	Email from SC Supreme Court acknowledging acceptance	Email from Kristen Porter, Case Management Specialist at SC Supreme Court, acknowledged filing and provided case number 2026-000919 (Attached Petition, Exhibits, POS, Email) Petition for Writ of Mandamus and Exhibits L&M follow	<u>2</u>
April 28, 2026	SC Supreme Court Issues Return Request to Charleston Common Pleas	SC Supreme Court Issues Return Request to Charleston Common Pleas. They have 10 days to answer.	<u>3</u>
May 11, 2026	Email filing Supplement from Petitioners to SCSC	May 11, 2026 Supplement to Petition for Writ of Mandamus of with its delivery email to the SC Supreme Court Filing email address.	<u>4</u>
May 11, 2026	Email to SCSC	Petitioners email SC Supreme Court to ask why Petition is not on docket.	<u>5</u>
May 11, 2026	SCSC Docket Check	Two docket pdf prints from https://ctrack.sccourts.org/public/caseSearch.do establish presence of Hicks case 2026-00915, which contradicts reason given for Petitioners' Petition missing from publicly viewable docket.	<u>6</u>
May 12, 2026	Email from SCSC	"Answers in Red" email responding to Petitioners (& attached Return from Charleston Common Pleas and Certificate of Service)	<u>7</u>
May 13, 2026	Phone call from SCSC	Kristen Porter from SC Supreme Court called Petitioner McNeil to state that "as a policy, they do not put non-attorney filings online." And that "both parties have to have counsel for the filing to be publicly visible", which is contradicted by the Hicks case 2026-00915.	na
May 14, 2026	Email from SCSC	Email from Kristen Porter at the SC Supreme Court with attached letter from the SC Supreme Court Clerk of Court Patricia Howard stating "Extraordinary writs ... not available on C-Track Public Access." and attached 2026-000919 - McNeil - Response.pdf	<u>8</u>

Date	Event Type	What Happened	Section (Jump to)
May 15, 2026	Petitioners emailed SC Supreme Court	Email responding to SC Supreme Court Response	<u>9</u>
May 15, 2026	SCSC Docket Check	Pdf prints of 2 targeted docket searches on SC Supreme Court https://ctrack.sccourts.org/public/caseSearch.do	<u>10</u>
May 19, 2026	SCSC Docket Check	Identical docket searches to those done 4 days earlier (in Section 10) reveal a docket anomaly – the counter-example of a self-represented party involved in a Petition for Writ of Mandamus - 2026-000915 - has been removed from the docket in the 4 day preceding period.	<u>11</u>
May 21, 2026	Email from SC Supreme Court	Kristen from SCSC wrote “Please see the attached order in the above referenced case.” attaching 2026-000919 - McNeil.pdf and McNeil Filing 05.12.26.pdf	<u>12</u>

Folder Screenshot of SC Supreme Court docket prints

Filename

Date Created

Filename	Date Created	File Type	Size
 2026-05-11-SCSC-Docket.pdf	5/11/2026 8:02 PM	Firefox PDF Document	1,337 KB
 2026-05-11-SCSC-Docket-OCR.pdf	5/24/2026 9:26 PM	Firefox PDF Document	83 KB
 2026-05-11-SCSC-Hicks-Example-2026-00915.pdf	5/11/2026 8:08 PM	Firefox PDF Document	980 KB
 2026-05-11-SCSC-Hicks-Example-2026-00915-OCR.pdf	5/24/2026 9:28 PM	Firefox PDF Document	31 KB
 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf	5/15/2026 3:37 PM	Firefox PDF Document	452 KB
 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf	5/24/2026 9:30 PM	Firefox PDF Document	30 KB
 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf	5/15/2026 3:38 PM	Firefox PDF Document	606 KB
 2026-05-15-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf	5/24/2026 9:32 PM	Firefox PDF Document	456 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ.pdf	5/19/2026 3:39 PM	Firefox PDF Document	417 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-OCR.pdf	5/24/2026 9:33 PM	Firefox PDF Document	32 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-V2.pdf	5/19/2026 3:45 PM	Firefox PDF Document	417 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed.pdf	5/19/2026 3:40 PM	Firefox PDF Document	708 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-OCR.pdf	5/24/2026 9:36 PM	Firefox PDF Document	40 KB
 2026-05-19-SCSC-Docket-Orig-Jur-Extraordinary-Writ-w-closed-V2.pdf	5/19/2026 3:46 PM	Firefox PDF Document	708 KB

Section 1

Email for April 14, 2026 Filing Petition for Writ of Mandamus

And Petition for Writ of Mandamus

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RECEIVED

Apr 14 2026

S.C. SUPREME COURT

From: chris.thaut.io
To: [Supreme Court Filings](#)
Cc: [C&M McNeil](#)
Subject: Filing: Petition for Writ of Mandamus - McNeil & Poyer v. Ninth Judicial Circuit Court of Common Pleas, Charleston County - Original Jurisdiction, Rule 245, SCACR
Date: Tuesday, April 14, 2026 3:04:47 PM
Attachments: [2026-04-08-Petition-Writ-of-Mandamus-McNeil-Poyer-v-SAC-181-et-al-2025-CP-10-05095.pdf](#)
[2026-04-14-Proof-of-Service-Petition-Writ-of-Mandamus-SC-Supreme-Court-2025-CP-10-05095.pdf](#)

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

To the Clerk of Court:

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

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

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

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

Respectfully submitted,

James C. ("Chris") McNeil, Pro Se

P.O. Box 30386, Charleston, SC 29417
chris@thaut.io
843-818-3495

Meaghan Poyer, Pro Se
P.O. Box 30386, Charleston, SC 29417
mcneilandpoyer@gmail.com
843-793-9863

Attachments:

1. Petition for Writ of Mandamus (with Exhibits Index and Exhibits L and M)
2. Proof of Service

Chris McNeil

Founder, Thaut

Strategic Thought Leadership

Mobile 843.818.3495

<http://thaut.io>

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

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

LinkedIn

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

Section 2

Email from SC Supreme Court Acknowledging Receipt of
Petition for Writ of Mandamus and Providing Case Number

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File Message Help Tell me what you want to do

Delete Archive Report Reply Reply All Forward All Apps Quick Steps Move Tags Editing Immersive Translate Zoom Reply with Scheduling Poll

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

Supreme Court Filings <supctfilings@sccourts.org>
To: chris thaut.io; mcneilandpoyer@gmail.com
Wed 4/15/2026 10:15 AM

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

- McNeil, James Mandamus Petition.pdf 369 KB
- McNeil, James Mandamus Petition Cover Email.pdf 157 KB
- McNeil, James Mandamus Petition Exhibits (only L and M).pdf 198 KB
- McNeil, James Mandamus Petition Proof of Service.pdf 36 KB

Dean Mr. McNeil,

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

Thank you,
Kristen

From: chris thaut.io <chris@thaut.io>
Sent: Tuesday, April 14, 2026 3:04 PM
To: Supreme Court Filings <supctfilings@sccourts.org>
Cc: C&M McNeil <mcneilandpoyer@gmail.com>
Subject: Filing: Petition for Writ of Mandamus - McNeil & Poyer v. Ninth Judicial Circuit Court of Common Pleas, Charleston County - Original Jurisdiction, Rule 245, SCACR

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

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Petitioners: James C. ("Chris") McNeil and Meaghan Poyer, Pro Se
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Underlying Case No.: 2025-CP-10-05095

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

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

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Apr 14 2026

S.C. SUPREME COURT

EXHIBITS INDEX

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

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

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

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

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

Exhibit E: Court Docket Entries Showing Selective Ruling Timeline

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

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

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

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

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

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

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

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

EXHIBIT L

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

Ninth Circuit Court of Common Pleas — Charleston County Motions for Leave to Amend: Comparative Ruling Timeline

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

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

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

EXHIBIT M

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

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

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

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S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

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

v.

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

PETITION FOR WRIT OF MANDAMUS

I. INTRODUCTION

Petitioners James C. ("Chris") McNeil and Meaghan Poyer respectfully petition this Court, in its original jurisdiction, for a Writ of Mandamus directed to the Ninth Judicial Circuit Court of Common Pleas, Charleston County, compelling the performance of clearly established ministerial duties that the circuit court has unreasonably refused to discharge for periods ranging from 68 to 166 days - while simultaneously ruling on a defense housekeeping motion in 5 days. This case, McNeil & Poyer v. SAC 181, LLC et al., Civil Action No. 2025-CP-10-05095, involves an eight-count landlord-tenant fraud, retaliation, and veil-piercing action brought by pro se Plaintiffs-Petitioners against corporate landlord entities and their principals. Three critical motions:

1. Plaintiffs' Motion for Leave to File the Second Amended Complaint (filed October 24, 2025; 166+ days unrulled),
2. Plaintiffs' ADA Accommodations Motion (filed January 30, 2026; 68+ days unrulled),
and
3. Relief requested in Plaintiffs' Omnibus Motion (filed February 24, 2026; 42+ days unrulled)

remain in procedural limbo despite repeated filings, briefs, and direct pleas to both the presiding judge and the Chief Administrative Judge for the Ninth Circuit.

Meanwhile, a routine defense Motion to Relieve Justine Tate as Counsel, filed April 2, 2026, was granted on April 7, 2026 -five calendar days. This selective responsiveness is not an isolated incident but the visible surface of a documented pattern of administrative gatekeeping that systematically advantages represented defense parties and disadvantages a lead pro se Plaintiff suffering from documented severe PTSD (PCL-5 score: 76 out of 80).

Petitioners have exhausted all available remedies within the circuit court. They have filed motions, supplemental notices, briefs in aid of safety, and direct communications to the Chief Administrative Judge - all without meaningful judicial action. No single judge is assigned to this case; the motions rotate among the judges of the Ninth Circuit. This structural reality makes the failure institutional rather than individual: multiple judges have had occasion to act, and the court as an institution has failed to do so. The ordinary remedy of motion → hearing → ruling is functionally unavailable to these Petitioners. This Court's intervention is the only remaining avenue to compel the ministerial acts the circuit court is obligated to perform.

II. JURISDICTION

This Court possesses original jurisdiction to issue writs of mandamus pursuant to Article V, Section 5 of the South Carolina Constitution and S.C. Code Ann. § 14-3-310, which provides:

"The Supreme Court shall have power to issue writs or orders of injunction, mandamus, quo warranto, prohibition, certiorari, habeas corpus and other remedial and original writs."

This Court exercises mandamus jurisdiction in cases involving significant public interest or unusual circumstances. See S.C. Bar, Guide to the Courts ("Normally, this only occurs when the case involves significant public interest or other unusual circumstances."). Both conditions are present here: the case implicates systemic access-to-justice failures for vulnerable pro se litigants and raises documented questions about selective judicial administration favoring represented parties connected to prominent local interests.

III. BACKGROUND, PURPOSE OF PRO SE STATUS AND ALIGNMENT WITH COURT

Petitioners note that their pro se status reflects an unusual combination of circumstances that this Court deserves to understand in context. Petitioner McNeil approaches this Court as a practitioner from adjacent and complementary disciplines - systems consulting, institutional analysis, and thought leadership - whose work is deeply aligned with the shared values of justice and equity that this Court serves. As a systems thinking consultant and inventor of the Strategic Thought Leadership methodology, he has expert witness experience in litigation involving high tech internet communications and the skillset of a non-witness expert litigation consultant.

When he immediately noticed the problems that led to the lawsuit were systemic, he decided to study the system of Housing Justice in Charleston, SC from the point of view of its most vulnerable member role : an unrepresented tenant who was harmed and deserves justice but

cannot afford an attorney. The most vulnerable member (MVM) stance is an accepted methodology to determine the resilience of a system.

He had recently developed an innovative application of his own Strategic Thought Leadership platform and his consulting practice was experiencing immediate traction of a product-market fit through training AI to help propagate new paradigms through “STL Schema” when the forced move and subsequent defense counsel exhaustion tactics flattened its velocity and kept it flat.

In order to demonstrate the value of that platform to a jury for the purpose of assessing punitive damages, in full transparency to defense counsel, he utilized the case itself as a study for the purpose of improving the housing system for everyone. He offers the work product of the Housing Justice Audit (available at housingjusticeaudit.com/report) as a contribution to the public record that is available to tenants, good-faith landlords, and to this Court as a decision-support tool.

A. What is Meant by Systems Thinking

Systems thinking, as defined by management theorist Russell Ackoff, holds that 'a system is never the sum of its parts; it's the product of their interactions.' Rather than analyzing individual components in isolation, systems thinking examines how parts interact, what feedback loops those interactions create, and where high-leverage interventions can change systemic behavior.

(Ackoff, R. L. (1994). *The Democratic Corporation: A Radical Prescription for Recreating Corporate America and Rediscovering Success*. Oxford University Press.)

This perspective is important both in understanding the basis for the Housing Justice Audit study, and its role as a demonstration of McNeil’s Strategic Thought Leadership Platform. The

stance Petitioners take in their diagnosis of the problems that have led to the need for this Petition for Writ of Mandamus is that the issues are clearly systemic. And McNeil's consulting experience has demonstrated that if the system itself doesn't change, the people can change yet the same problems will recur with new people in the same roles. And without changing the thinking behind the system - the core mental model - a revised or new system is likely to be just as problematic.

That is the reason the Housing Justice Audit that Petitioner McNeil produced through this case focuses on what System Thinker Donella Meadows calls the highest leverage point in intervening in a system: paradigms. McNeil's platform assists in that by providing and distributing the solution paradigm of *Conscious Co-Stewardship* as a replacement for the discovered core problem paradigm at the root of the events of this case: the assumption of "*unconscious abdication*" buried within the concept of "*passive investing*".

(Meadows, D. H. (1999). *Leverage Points: Places to Intervene in a System*. The Sustainability Institute.)

The Strategic Thought Leadership research ran parallel with this case demonstrated both the prevalence of the passive investing model and that what is usually meant by the term is actually unconsciously abdicating to agents, which creates a dark space within which bad actors can thrive. Further, it also discovered the deeper assumption within unconscious abdication that "you must hurt people in order to make more money", which runs counter to the well-accepted "better service = more profits" paradigm in most services businesses but is allowed to fester in housing due to the perceptual distortions of the human need for shelter, the high cost of switching

providers, the difficulty in getting visible feedback that would demonstrate tenant-centered service as opposed to tenant exploitation in property management, and the opacity of tenant housing ownership that is prevalent and demonstrated in this case.

The conscious co-stewardship model, by contrast, unifies investor, manager, and tenant under a shared values and belief system around reverence for the shelter life stories play out in. And a highly regarded study from the UK funded and sponsored by the Office of the Deputy Prime Minister (ODPM), *A Systematic Approach to Service Improvement: Evaluating Systems Thinking in Housing*, which used a Systems Thinking approach called the Vanguard Method developed by an acquaintance and mentor of McNeil, John Seddon. The study demonstrated that by shifting from 'Command and Control' to systems thinking, organizations achieved a 'triple win': better experience, lower costs, and higher financial performance.

The study in the UK demonstrated that by shifting from "Command and Control" (targets and bureaucracy) to "Systems Thinking" (designing work around tenant demand), organizations achieved a "triple win": better experience, lower costs, and higher financial performance.

B. Why No Counsel at this Stage

Petitioners are actively working to onboard experienced and values-aligned counsel as they did not intend to handle this matter pro se this long in a case this complex. The delays and procedural dysfunction documented herein - compounded by the severe PTSD directly caused by defense conduct during those delays - have made that transition both more urgent and more difficult because of the institutional betrayal experienced through the documented behavior of Phelps Dunbar and Resnick & Louis defense attorneys. Petitioners are currently actively working

towards retaining appropriate counsel with a more robust due-diligence process than initially anticipated, which simply takes more time.

This background is relevant because, since the MVM Method demonstrates that a system's resilience can be measured by how it performs for its most vulnerable members, this Court's intervention will strengthen the public's confidence in the Ninth Circuit's administration of justice.

As a systems consultant who studies institutional performance for a living, Petitioner McNeil recognizes that the pattern documented herein reflects structural dynamics of a selective-action pattern visible on the court's own docket - five days for a defense housekeeping motion, 166 days for an unopposed motion to amend - is the kind of systemic signal that, left unaddressed, erodes institutional credibility. This Petition asks the Court to address it - quickly, cleanly, and in a way that strengthens the integrity and credibility of the court by reinforcing the principle that all litigants, regardless of representation status, receive equal access to the court's ministerial functions.

IV. STATEMENT OF FACTS

A. The Underlying Action

On or about August 2025, Petitioners commenced this action against SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, Tara Bayles, and MRG Investing Company LLC, alleging violations of the South Carolina Residential Landlord and Tenant Act (S.C. Code Ann. § 27-40-410 et seq.), fraudulent misrepresentation involving falsified federal postal documentation,

invasion of privacy, retaliatory eviction, breach of habitability, corporate veil-piercing, and related claims. The Amended Complaint was filed September 15, 2025.

B. The Motion for Leave -166+ Days Without Ruling

On October 24, 2025, Petitioners filed a Motion for Leave to File the Second Amended Complaint ("Second Amended Complaint"). The proposed Second Amended Complaint adds Charles S. Altman as an individual defendant -the Registered Agent and beneficial owner-principal of defendant SAC 181, LLC - and adds counts for invasion of privacy related to the mass distribution of Petitioners' images and personal property on public websites without consent. These images were discovered by Plaintiffs on or around September 18, 2025 – after the filing of the Amended Complaint.

Charles S. Altman has been engaged with this case since its inception as Registered Agent of SAC 181, LLC. He is a prominent member of the Charleston legal and real estate community, as is his nephew Jonathan S. Altman, who serves on Mayor William Cogswell's Homeownership Initiative Commission - a fact that creates documented conflicts of interest relevant to the pattern of judicial inaction described herein.

As of the date of this Petition, 166 days have elapsed since the Motion for Leave was filed. No hearing has been set. No order has been entered. The motion sits on the docket in the same procedural posture as the day it was filed.

A comparative analysis of all motions for leave to amend filed in the Ninth Circuit Court of Common Pleas since 2023 confirms that Petitioners' experience is an extreme statistical outlier.

Of eleven granted motions in the dataset, the median time to ruling is 39 days. Forty-five percent were granted in three days or less. The longest took 128 days. Petitioners' unopposed motion has been pending 166 days - 4.3 times the median and the only unopposed motion in the dataset still unruled beyond 60 days. *[Exhibit L. Comparative Analysis of Motions for Leave to Amend, Ninth Circuit Court of Common Pleas]*

Under SCRCP Rule 15(a), leave to amend "shall be freely given when justice so requires." The standard is liberal, and denial is the exception requiring specific findings of prejudice, bad faith, or futility. None of those conditions exist here; no opposition to the Motion for Leave has been filed by any defendant. The circuit court's 166-day failure to rule on an unopposed, presumptively grantable motion is unreasonable by any measure.

C. The ADA Accommodations Motion -68+ Days Without Ruling

On January 30, 2026, Petitioner McNeil filed a Supplemental ADA Accommodations Motion documenting his diagnosed severe PTSD (PCL-5 score of 76 out of 80 -classified as "extreme" on a validated clinical instrument), requesting accommodations including virtual/remote hearing attendance and electronic filing access. The motion was supported by clinical documentation and detailed the causal chain from defense counsel's documented abusive conduct through Petitioner's nervous breakdown to the current disability.

On February 9, 2026, Chief Administrative Judge Dale E. Van Slambrook convened a status conference in this case, at which he identified the ADA Motion as a priority matter. Despite this judicial prioritization, 68 days have now passed without any ruling, order, or response from the circuit court.

During the same period, defense counsel Alicia Bolyard's informal email request for WebEx access to the April 3, 2026 hearing was accommodated within 3 days by court staff -on the same email thread in which court administrator Beth Atkins had characterized Petitioners' safety filing as "ex parte" and "not allowed," despite all parties and counsel being copied.

D. The Two Continuances Under False Pretenses

1. **The December 19, 2025 Continuance.** A hearing originally scheduled before Judge Rode for December 19, 2025, was continued by Judge McCoy based on defense counsel's fabricated representation of Plaintiffs' consent. This continuance directly enabled three additional months of defense obstruction -including the coordinated discovery abuse, systematic psychological manipulation documented in defense counsel communications (Exhibits F and K to the November 10, 2025 Motion to Compel), witness tampering, and intimidation tactics documented extensively in the record - that produced Petitioner McNeil's documented nervous breakdown.
2. **The April 3, 2026 Continuance.** On March 26, 2026 - six days after Petitioners filed a comprehensive Brief in Aid of Safety Risk Mitigation and Judicial Clarity detailing catastrophic exposure models, attorney exodus from the defense, and escalating safety risks -Judge McCoy issued a letter continuing the April 3, 2026 hearing indefinitely. The stated justification was the need for Chief Administrative Judge Van Slambrook to intervene on an "administrative assignment question."

This stated justification is demonstrably false. Chief Administrative Judge Van Slambrook's own April 2, 2026 Order (Judgment Form 4) establishes that:

- a) The February 9, 2026 status conference already resolved the assignment question;
- b) Complex case designation was denied; and

c) All motions "shall be placed on Court rosters pursuant to normal scheduling procedures."

The Chief Administrative Judge's April 2 Order confirms that the predicate for McCoy's indefinite continuance -an unresolved administrative assignment question -was already resolved two months earlier at the February 9 conference that Van Slambrook himself presided over. The continuance rests on no valid procedural foundation.

E. The Selective-Action Pattern – (See Exhibit L)

The following table, derived from the official court docket, demonstrates the selective responsiveness that renders ordinary remedies unavailable to Petitioners:

Motion	Filed By	Begin Date	Completed	Days
Motion to Relieve Justine Tate	Defense (SAC 181)	04/02/2026	04/07/2026	5 days
ADA Accommodations (Supp.)	McNeil	01/30/2026	- unruléd -	68+ days
Motion for Leave to File Second Amended Complaint	McNeil	10/24/2025	- unruléd -	166+ days
Case Age Total	System-wide			211 days

A housekeeping motion for a departing defense attorney receives a ruling in 5 days - the same week the ADA Motion crosses its 68th day without response and the Motion for Leave reaches 166 days. This selective-action pattern is consistent with the administrative gatekeeping

documented in the Atkins/court staff email thread, now codified on the official court docket itself.

At the time of writing this Petition, there are no Motions by Plaintiffs that have been ruled on. The Motion/Expedited Hearing on Motion/Disqualify Counsel and Motion to Disqualify Counsel show “Completion Dates” reflecting the Notice of Moot motions plaintiffs filed on December 3, 2025 to assist the court with docket management. They were rendered moot when original defense attorney Eric Pettis left the case. The court as a system processes defense motions with dispatch while Petitioners' motions languish across multiple judges' desks. *[Exhibit L, Comparative Analysis of Motions for Leave to File Amended Complaint, Ninth Circuit Court of Common Pleas]*

F. Documented Harm to Petitioners

The circuit court's inaction has produced concrete, escalating harm:

1. Petitioner McNeil suffered a **documented nervous breakdown** directly caused by the defense abuse enabled by the first McCoy continuance, resulting in a PCL-5 PTSD score of 76/80 ("extreme/severe"), documented in the January 28 and January 30, 2026 filings.
2. Petitioner Poyer has filed a **sworn Affidavit** (Exhibit E to the January 30, 2026 filing) detailing the **high personal cost of defense lawfare on the family**.
3. The **continued delay** in granting leave for the Second Amended Complaint **permits the proposed individual defendant Charles S. Altman to continue repositioning assets** -as evidenced by his January 12, 2026 payoff of a mortgage less than 10 years old on his personal residence, occurring after the Second Amended Complaint naming him individually was filed but before it was granted - increasing the risk that any eventual judgment will be uncollectible.

4. The **ADA violations force a traumatized pro se litigant to navigate a hostile procedural environment** without the accommodations that federal and state law mandate, compounding the documented psychological injury.

G. The Public Interest Dimension

This case carries significant public interest implications that independently warrant this Court's exercise of original jurisdiction:

1. **Housing Justice Systemic Implications.** The underlying action exposes systemic patterns in Charleston's housing ecosystem documented in the Housing Justice Audit (published at housingjusticeaudit.com/report), including what the Audit identifies as the "Ask-Harm Loop" - a systems dynamic in which vulnerable tenants' requests for legally mandated protections trigger retaliatory harm rather than compliance.
2. **Conflicts of Interest Affecting Public Programs.** Jonathan S. Altman, nephew of proposed defendant Charles S. Altman and financial beneficiary of defendant SAC 181, LLC, has served as a long-standing member of the Homeownership Initiative Commission since 2007. While his service predates the current administration, he remains a key figure on the commission currently advising Mayor William Cogswell, who is focused on the '**Project 3500**' affordable housing initiative. This deeply entrenched role within the city's housing policy framework creates significant public interest in a case alleging tenant exploitation and asset repositioning by the Altman family.
3. **Access to Justice for the Vulnerable.** The documented pattern of selective judicial administration - instant accommodation for represented defense parties, indefinite silence accompanied by obstruction for pro se plaintiffs with documented disabilities - raises

systemic concerns about equal access to justice in the Ninth Circuit that extend beyond this individual case. This supports the integrity and credibility of the court because, as the Housing Justice Audit notes, a measure of resilience is how well a system performs for its most vulnerable member.\

4. **Documented Systemic Bias Against Unrepresented Litigants.** The pattern of selective judicial administration documented in this case is systemic. Peer-reviewed research establishes that pro se status itself generates measurable bias in judicial and legal decision-making. [*Exhibit L, Comparative Analysis of Motions for Leave to Amend, Ninth Circuit Court of Common Pleas*]

H. System Behavior Findings

Petitioner McNeil's unusual dual position - a professional systems analyst operating within the system as a pro se litigant - creates a natural experiment that isolates the variable of pro se status from the variable of litigation skill. In most cases, it is impossible to determine whether adverse outcomes for unrepresented parties result from inferior filings or from status-based bias. This case removes that ambiguity.

An inference can be drawn from SAC 181, LLC's counsel's November 10, 2025 Motion for Case Management Order Regarding the Use of AI that Petitioner's filings were too sophisticated to have been produced by a pro se litigant without artificial intelligence assistance. This interpretation of that motion - whatever its tactical purpose - constitutes an admission that the quality of Petitioner's work product is at or above the standard of represented counsel. Defense counsel's own filing holds litigation quality constant.

The chronological impossibility of defense counsel's theory merits emphasis. On September 30, 2021- thirteen months before the public launch of ChatGPT (November 30, 2022) and eighteen

months before Claude (March 2023) - Petitioner McNeil filed a substantive Opposition to Motion for Protective Order in Case No. 2021-CP-10-02237, Charleston County Court of Common Pleas. That case was brought against, among other corporate defendants, SAC 181, LLC - the same entity now represented by the counsel who filed the AI motion. The 2021 filing demonstrates the analytical approach, values-based reframing, and systemic argumentation visible in Petitioner's current filings. It remains a public record on the same court's docket. Defense counsel's failure to conduct even a basic docket search of their own client's litigation history before filing a speculative AI motion - a search that would have immediately disproven the premise of the motion - underscores both the frivolous nature of the motion and its utility as an inadvertent control variable in the natural experiment described above.

This is relevant because, with quality held constant, the selective-action pattern documented in Section IV.E isolates the remaining variable. If Petitioner's filings meet or exceed the standard of represented parties - as defense counsel's own motion concedes - then the 33:1 processing disparity (5 days for a defense motion, 166 days for Petitioner's unopposed motion to amend) cannot be explained by filing quality. It can only be explained by the signaling effect of pro se status itself - the precise bias mechanism identified in peer-reviewed research. See Quintanilla & Cain, 42 Law & Soc. Inquiry 1554 (2017).

This Petition functions, in part, as an information flow intervention: it makes visible, through the court's own docket data, a pattern that may otherwise remain invisible to the institution experiencing it. When the Ninth Circuit's docket shows a 5-day turnaround for defense counsel and a 166-day non-response for pro se plaintiffs, the system is producing a signal about its own health that merits this Court's supervisory attention.

The pro se litigant - the unrepresented tenant asserting statutory rights against represented corporate interests - is the most vulnerable member of the judicial system. That member has experienced, in this case, what research confirms is a systemic pattern: the harder the pro se litigant pushes for the system to perform its basic functions (rule on motions, grant mandated accommodations, schedule hearings), the more the system resists. This dynamic - which this case and the Housing Justice Audit have documented as the "Ask→Harm Loop" - is precisely the kind of institutional brittleness that mandamus exists to correct.

A resilient judicial system performs its ministerial functions regardless of litigant status. A brittle system requires Supreme Court intervention to compel that performance. The circuit court's docket demonstrates which type of system Petitioners are navigating. This Court's intervention converts the brittle response into a resilient one.

This finding is relevant not only to this case but to this Court's supervisory interest in the administration of justice across the Ninth Circuit. If a pro se litigant producing represented-quality work product still experiences a 33:1 processing disparity, the systemic implications for less-skilled unrepresented litigants - the single mothers, the elderly tenants, the disabled individuals who cannot produce sophisticated filings - are profound. The disparity this Petition documents is the floor, not the ceiling, of the access-to-justice problem in the circuit court.

I. Institutional Courage Within the System

Petitioners note that Chief Administrative Judge Van Slambrook's February 9, 2026 status conference and April 2, 2026 Order represent meaningful exercises of supervisory authority. Judge Van Slambrook identified the ADA Motion as a priority matter and directed that all motions be placed on court rosters pursuant to normal scheduling procedures. These actions reflect institutional responsiveness and are acknowledged with respect. The concern that

necessitates this Petition is that the circuit court as an institution has not yet followed through on these directives - the ADA Motion remains unrulled 68 days after the Chief Administrative Judge identified it as a priority, and no motions have been scheduled despite the April 2 Order. This Court's intervention is sought to give effect to directives the Chief Administrative Judge has already issued but which the institution has not yet executed.

V. THE FOUR MANDAMUS ELEMENTS ARE SATISFIED

Under South Carolina law, a writ of mandamus requires: "(1) a duty to perform the act; (2) the ministerial nature of the act; (3) the petitioner's specific legal right for which discharge of the duty is necessary; and (4) a lack of any other legal remedy." *HHHunt Corp. v. Town of Lexington*, 389 S.C. 623, 640, 699 S.E.2d 699, 707 (2010), citing *Sanford v. S.C. State Ethics Comm'n*, 385 S.C. 483, 494, 685 S.E.2d 600, 606 (2009). See also *Redmond v. Lexington Cty. Sch. Dist. No. Four*, 314 S.C. 431, 445 S.E.2d 441 (1994).

A. Element One: Duty to Perform

- 1. Duty to Rule on Pending Motions.** Circuit court judges have a clear legal duty to rule on properly filed motions within a reasonable time. A motion filed, served, and pending before a court imposes a corresponding judicial duty to act. The Motion for Leave has been pending 166 days; the ADA Motion 68 days. No scheduling order, no hearing date, no order of any kind has issued on either. The duty to act is clear and has been persistently ignored.
- 2. Duty to Grant Leave Freely.** Under SCRCRCP Rule 15(a), leave to amend "shall be freely given when justice so requires." Where no opposition has been filed, no prejudice demonstrated, and no basis for denial articulated, the circuit court's duty

to grant leave approaches the ministerial. The 166-day silence on an unopposed motion to amend is an unreasonable refusal to discharge this duty.

3. **Duty to Provide ADA Accommodations.** Under Title II of the Americans with Disabilities Act, 42 U.S.C. § 12132, and the ADA Amendments Act of 2008, state courts must provide reasonable accommodations to qualified individuals with disabilities. The duty is non-discretionary once a qualifying disability and reasonable accommodation request are established -both of which are documented in the record. The 68-day failure to act on a supported ADA request, while granting defense counsel's identical informal request within hours, violates both the statutory mandate and Equal Protection principles.
4. **Duty to Schedule Motions for Hearing.** Chief Administrative Judge Van Slambrook's April 2, 2026 Order directs that all motions in this case "shall be placed on Court rosters pursuant to normal scheduling procedures." This is a direct administrative directive from the supervising judge that the circuit court has a duty to follow. The indefinite continuance issued six days earlier, premised on the very assignment question Van Slambrook's Order resolved, contravenes this directive.

B. Element Two: Ministerial Nature of the Acts

Each requested act is ministerial - requiring no exercise of judicial discretion or weighing of competing interests:

1. **Granting an unopposed motion for leave to amend**, where SCRCP 15(a) mandates liberal grant and no party has identified prejudice, futility, or bad faith, is ministerial in character. The rule prescribes the result; the judge merely executes.

2. **Ruling on an ADA accommodations request** supported by clinical documentation is ministerial. The ADA imposes a non-discretionary duty; the court's only function is to determine whether the accommodation is reasonable -a determination that does not require 68 days of silence, particularly when the identical accommodation has already been informally granted to opposing counsel.
3. **Scheduling motions for hearing pursuant to the Chief Administrative Judge's express directive** is ministerial. Van Slambrook's April 2, 2026 Order removes any discretionary predicate; the scheduling is commanded.

C. Element Three: Petitioners' Specific Legal Rights

1. **Right to Amend.** SCRCF Rule 15(a) grants litigants a specific legal right to seek leave to amend, with a strong presumption of grant. Petitioners have a particularized right to add Charles S. Altman, whose role as beneficial owner and Registered Agent of SAC 181, LLC is central to the veil-piercing and fraud claims, and to add image-distribution counts addressing the invasion of privacy that is a core wrong in this case.
2. **Right to ADA Accommodation.** Petitioners have a specific legal right under 42 U.S.C. § 12132 and 28 C.F.R. § 35.130 to reasonable accommodation in state court proceedings. The failure to act on the ADA request directly impairs Petitioner McNeil's ability to participate in the litigation of his own case.
3. **Right to Access the Court.** The Due Process Clause of the Fourteenth Amendment and Article I, Section 3 of the South Carolina Constitution guarantee litigants meaningful access to the courts. The circuit court's indefinite refusal to rule on motions, coupled with continuances based on demonstrably false

predicates, effectively denies Petitioners the access to which they are constitutionally entitled.

4. **Right to Timely Adjudication.** Petitioners' documented severe PTSD, the ongoing risk of asset dissipation by proposed defendant Charles S. Altman, and the escalating safety concerns documented in the March 20, 2026 Safety Brief all create a particularized right to timely adjudication that the circuit court's inaction directly impairs.

D. Element Four: Lack of Any Other Legal Remedy

This element is dispositive. The selective-action pattern documented in Section IV.E demonstrates that the ordinary remedy - filing a motion and awaiting a ruling - is functionally unavailable to these Petitioners:

1. Petitioners have filed motions. They sit unrulled for 68 to 166 days.
2. Petitioners have filed supplemental briefs, notices, and safety analyses. They are received and ignored.
3. Petitioners have directly petitioned the Chief Administrative Judge. His April 2, 2026 Order confirms the administrative predicate is resolved, yet no scheduling follows.
4. Petitioners have documented the selective-action pattern in court filings. The pattern continues.
5. There is no interlocutory appeal available for a court's failure to act - one cannot appeal a non-ruling.
6. The circuit court's own docket proves that the ordinary motion-to-ruling pipeline works for defense parties (5 days) but not for Petitioners (68-166+ days and counting).

7. Because no single judge is assigned to this case, Petitioners cannot seek recusal or reassignment as a remedy - the dysfunction is systemic across the rotating bench. The only authority with supervisory power over the Ninth Circuit Court of Common Pleas as an institution is this Court.

Petitioners have done everything the system permits a litigant to do. The system has not responded. The only remaining remedy is this Court's supervisory mandamus authority.

VI. SPECIFIC RELIEF REQUESTED

Petitioners respectfully request that this Court issue a Writ of Mandamus directed to the Ninth Judicial Circuit Court of Common Pleas, Charleston County, and any judge thereof to whom the below matters are or may be assigned:

- A. **Order Rule on the Motion for Leave to File the Second Amended Complaint; or, in the alternative**, in the exercise of this Court's supervisory power and in light of the 166+ day unopposed delay, **deem the Second Amended Complaint granted** to prevent further erosion of the Plaintiffs' right to a remedy.

Ordering a ruling on or granting Petitioners' Motion for Leave to File the Second Amended Complaint, filed October 24, 2025, adds Charles S. Altman as an individual defendant and adds image-distribution invasion-of-privacy counts. The Motion is unopposed. SCRCRCP Rule 15(a) mandates liberal grant. The 166-day delay is unreasonable and prejudicial. The Second Amended Complaint shall supersede the Amended Complaint filed September 15, 2025, upon entry of this Order.

- B. **Order Shortening the Answer Period for the Second Amended Complaint to Fifteen (15) Days**

Direct that Charles S. Altman and all defendants shall have fifteen (15) days from the date of service of the Second Amended Complaint (or the day before any next-scheduled hearing, whichever is earlier) to answer or otherwise respond to the Second Amended Complaint. This shortened period is warranted because:

1. **Charles S. Altman has been engaged with this litigation since its inception** as Registered Agent of SAC 181, LLC and is fully aware of the claims, having received all filings through counsel;
2. The proposed **Second Amended Complaint has been publicly available on the docket since October 24, 2025** -over five months -providing ample constructive notice;
3. Every additional day of delay extends Petitioners' **exposure to documented high-risk conditions**, including severe PTSD already at 76/80 on the PCL-5; and
4. **Evidence of asset repositioning** by Charles S. Altman (January 12, 2026 payoff of a mortgage less than 10 years old) creates urgency to bring all parties before the court.

C. Order Granting the ADA Accommodations Requested in the January 30, 2026 Filing

Direct the circuit court to immediately rule on and grant the ADA accommodations requested in the January 30, 2026 Supplemental ADA Accommodations Motion, including virtual/remote hearing access and electronic filing privileges. The accommodations are clinically supported, legally mandated, and have already been informally granted to defense counsel -making continued denial to Petitioners both discriminatory and indefensible.

D. Direct the Circuit Court to Schedule All Pending Motions Pursuant to Normal Scheduling Procedures

Direct the Ninth Judicial Circuit Court of Common Pleas to comply with Chief Administrative Judge Van Slambrook's April 2, 2026 Order by placing all pending motions on court rosters pursuant to normal scheduling procedures within fourteen (14) days of this Court's Order, and to conduct the hearing within thirty (30) days thereafter - regardless of which judge of the circuit the motions appear before.

The Chief Administrative Judge's April 2 Order establishing that all motions "shall be placed on Court rosters pursuant to normal scheduling procedures" -combined with an indefinite continuance granted six days earlier citing an "administrative assignment question" already resolved at the February 9 conference - demonstrates that the continuance rests on no valid procedural predicate, and that the circuit court's inaction on pending motions constitutes an unreasonable refusal to perform a clearly established ministerial duty.

E. Preserve Asset Discovery and Equitable Relief

To the extent this Court deems it appropriate and within the scope of mandamus relief, Petitioners request that this Court note for the record the documented evidence of asset repositioning by the Altman principals -including the January 12, 2026 payoff by Charles S. Altman of a mortgage less than ten years old, the documented \$350,000 probate valuation discrepancy concerning the SAC 181, LLC property (detailed in the December 3, 2025 Memorandum and December 11, 2025 Supplemental Memorandum filed in the underlying action), and the veil-piercing, unclean hands, and estoppel doctrines raised therein -and direct the circuit court, upon resumption of normal proceedings, to give priority consideration to

Petitioners' requests for asset preservation and discovery into Altman-affiliated entities to prevent dissipation of assets that may be necessary to satisfy any judgment.

VII. CONCLUSION

This Petition presents a textbook case for mandamus relief. Motions involving clearly established ministerial duties have sat unruly for periods that are unreasonable by any standard. The circuit court's institutional selective responsiveness is documented on its own docket: 5 days for a defense housekeeping motion; 166 days and counting for Petitioners' presumptively grantable motion to amend.

But this Petition is offered in the spirit of service to the institution, not criticism of it. Petitioners share this Court's commitment to equal justice and believe that the pattern documented herein - however it arose - represents an institutional signal that warrants correction. The correction is straightforward: compel the ministerial acts the circuit court is obligated to perform, and confirm by doing so that the courthouse door opens equally for all litigants - represented and unrepresented alike.

As peer-reviewed research confirms, the unrepresented litigant faces measurable, documented bias at every stage of civil litigation - not because of case quality, but because of status signaling inherent in the pro se label itself. See Quintanilla & Cain, 42 Law & Soc. Inquiry 1554 (2017). When that documented bias intersects with a representation disparity that produces a 33% error rate in housing courts nationwide - and when this Court's own docket reflects a 33:1 ratio in processing speed between defense and pro se motions - the case for supervisory intervention is compelling.

While Petitioners are actively transitioning to represented status, in the interim they ask this Court to ensure that the circuit court's ministerial functions operate with the same dispatch for all

parties. The relief requested is modest, ministerial, and directly within this Court's well-established supervisory authority.

Justice delayed is justice denied. For Petitioners - one of whom carries a clinically documented severe PTSD score inflicted by the very litigation conditions this court's inaction perpetuates — each additional day of delay compounds concrete harm. The circuit court's persistent and unreasonable refusal to perform its ministerial duties warrants this Court's intervention.

Petitioners respectfully request that this Court grant the Writ of Mandamus and order the relief described herein.

RECEIVED

Apr 14 2026

S.C. SUPREME COURT

VERIFICATION

We, James C. ("Chris") McNeil, and Meaghan Poyer, verify under penalty of perjury that the facts stated in this Petition are true and correct to the best of our knowledge, information, and belief.

Respectfully submitted this 8th day of April, 2026,

A handwritten signature in black ink, appearing to read "Chris McNeil", written over a horizontal line.

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

A handwritten signature in blue ink, appearing to read "Meaghan Poyer", written over a horizontal line.

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

Section 3

Email from Kristen Porter at SC Supreme Court

With attached Return Request to
The Honorable Julie J. Armstrong,
Charleston County Clerk of Court

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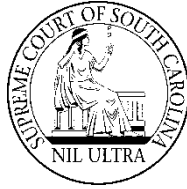
chris thaut.io

From: Porter, Kristen <kporter@sccourts.org>
Sent: Tuesday, April 28, 2026 11:18 AM
To: chris thaut.io; mcneilandpoyer@gmail.com
Subject: 2026-000919 - McNeil v. Ninth Judicial Circuit Court - Return Request
Attachments: 2026-000919 - McNeil - Return Request.pdf

Please see the attached request for a return.

Thank you,
Kristen Porter
Case Management Specialist
Supreme Court of South Carolina
803-734-1080

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



# The Supreme Court of South Carolina

Patricia A. Howard  
CLERK OF COURT

Brenda F. Shealy  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330  
COLUMBIA, SOUTH CAROLINA  
29211

TELEPHONE: (803) 734-1080  
FAX: (803) 734-1499

April 28, 2026

The Honorable Julie J. Armstrong  
Charleston County Clerk of Court  
100 Broad Street  
Suite 106  
Charleston, SC 29401-2210

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

Dear Ms. Armstrong:

James C. "Chris" McNeil and Meaghan Poyer have filed a letter with this Court, which has been construed as a request for relief in this Court's original jurisdiction. A copy is enclosed. The Court has requested that you serve and file a return to this petition addressing the current status of Petitioners' pending motions. Please serve and file the response within ten days of the date of this letter.

Sincerely,

*Patricia A. Howard*

Clerk

Enclosure

cc: James C. "Chris" McNeil  
Meaghan Poyer

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

# Section 4

May 11, 2026 Email to SC Supreme Court Filing Supplement to Petition for Writ of Mandamus

And

Supplement to Petition for Writ of Mandamus of May 11, 2026

(attached entire Common Pleas filing of the same day as an exhibit)

[Back to table](#)

**From:** chris thaut.io  
**Sent:** Monday, May 11, 2026 1:50 PM  
**To:** Supreme Court Filings  
**Cc:** C&M McNeil  
**Subject:** Filing: Petitioners' Supplement Following April 28, 2026 Return-Request Letter | Appellate Case No. 2026-000919  
**Attachments:** 2026-05-11-Supplement-Following-April-28-Return-Request-2026-000919.pdf

To the Clerk of Court:

Please accept for filing the attached:

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

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

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

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

Respectfully,

James C. McNeil & Meaghan Poyer  
Plaintiffs Pro Se  
PO Box 30386  
Charleston, SC 29417  
Email: [chris@thaut.io](mailto:chris@thaut.io); [mcneilandpoyer@gmail.com](mailto:mcneilandpoyer@gmail.com)  
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**THE STATE OF SOUTH CAROLINA**  
**In the Supreme Court**

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**IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT**

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

**v.**

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

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

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**I. INTRODUCTION & THE CONTINUED FAILURE TO PERFORM  
MANDATORY DUTIES**

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

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

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

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

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

## **II. THE FOURTEENTH AMENDMENT SIGNIFICANCE OF THE CURRENT STATUS RECORD**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **IV. CONCLUSION**

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

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

Respectfully submitted this 11<sup>th</sup> day of May, 2026.



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# **EXHIBIT A**

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

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

James C. (“Chris”) McNeil and  
Meaghan Poyer,

Plaintiffs,

v.

SAC 181, LLC,  
Meridian Residential Group, LLC,  
Adam W. Bayles, individually,  
Tara Bayles, individually, and  
MRG Investing Company LLC

Defendants.

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) IN THE COURT OF COMMON  
) PLEAS  
) NINTH JUDICIAL CIRCUIT  
)  
) Civil Action No. 2025-CP-10-05095  
)  
) PLAINTIFFS’ NOTICE OF  
) PRE-HEARING  
) SAFETY AND CASE-  
) MANAGEMENT MATTERS,  
) REQUEST FOR  
) TEMPORARY RESTRAINING  
) ORDER AND COURT-  
) ORDERED FORENSIC  
) AUDIT OF ALTMAN-  
) CONTROLLED  
) ENTITIES, AND PROPOSED  
) ROSTER REORGANIZATION  
) FOR MAY 28, 2026 HEARING

FILED  
2025 MAY 11 AM 11:30  
CLERK OF COURT

Plaintiffs James C. (“Chris”) McNeil and Meaghan Poyer respectfully submit this Notice and Request in advance of the May 28, 2026 hearing before the Honorable Will Wheeler. This filing presents a narrow set of actions that can restore functional order to a case whose underlying record now reaches beyond a private landlord-tenant dispute and into a broader convergence of judicial, administrative, policy, and narrative-system failures already visible on the public record.

The urgency here arises from a specific structural condition already documented in this case: a minimizing false narrative of events has been preserved through friction, delay, selective process movement, and narrative minimization across multiple reinforcing lanes at once. Plaintiffs’ record describes executive and administrative

obstruction in the LLR and sheriff pathways, judicial asymmetry and motion blackout in the Common Pleas docket, conflict-laden housing-policy overlap in the city's affordability governance sphere, and a local press environment whose incentives, as set out in Exhibit B, have preserved elite plausibility rather than serving as a corrective feedback loop. The result is a captured narrative system where evidence, harm signals, and corrective pressure encounter friction at each higher layer.

This matters now because the system is reaching the point described throughout Plaintiffs' filed materials as false-narrative collapse. The April 28, 2026 return-request letter from the Supreme Court of South Carolina placed the long-running motion-blackout pattern under active supervisory review, and the documentary record already before this Court has become too dense to remain quietly subordinated to the routine "these harms didn't happen" frame advanced by Defendants. Plaintiffs'

Whistleblower Revelations Report identifies the familiar sequence that follows when a status-protective narrative begins to fail: initial minimization, reframing of the truth-teller, institutional delay, selective enforcement of process, and then concentrated pressure on the party closest to the evidence once outside scrutiny arrives.

That sequence carries practical consequences for this Court's pre-hearing decisions.

When multiple institutions have become invested in the continuity of a false narrative, acknowledgment of the actual record can trigger rapid retaliation, intensified narrative inversion, further procedural obstruction, and movement of assets before civil

accountability reaches judgment. Plaintiffs therefore ask this Court to act now in the two domains most sensitive to false-narrative collapse: protection of the vulnerable parties' access and safety, and preservation of the asset base against further conversion or transfer.

The record already supports immediate action on the papers in five areas:

- **First, Plaintiffs' Supplemental Motion for ADA Accommodations has been pending since January 30, 2026**, and the record already contains the disability, reasonableness, and hearing-access material necessary for a chambers ruling before May 28.
- **Second, Plaintiffs' Motion for Leave to File the Second Amended Complaint has remained pending since October 24, 2025**, and the eventual opposition filed on April 21, 2026 engaged none of the evidentiary record central to the proposed pleading.
- **Third, Plaintiffs' December 23, 2025 Rule 36 sufficiency motion offers a direct narrowing mechanism** whose pre-hearing review can materially reduce the number of live factual disputes and derivative motions.
- **Fourth, the record supports immediate status-quo preservation relief directed to the Altman-controlled entity cluster**, or at minimum the fallback notice, preservation, and expedited forensic-discovery measures set out in

Section V, in light of the documented January 12, 2026 early mortgage payoff on 39 Wappoo Creek Place and the short interval remaining before May 28.

- **Fifth, the Supreme Court’s active supervisory posture makes continuity of assignment under Judge Wheeler the cleanest available stabilizing response within the trial court system.**

Plaintiffs ask the Court to view these requests as a coordinated protective sequence. Access relief, pleading regularization, Rule 36 narrowing, asset-preservation relief, and continuity of assignment each serve the same core judicial purpose: they create a stable procedural boundary before the false narrative system reacts further to the evidence already on file. Exhibit C shows that several matters presently set for May 28 are ripe for papers-only resolution or pre-hearing narrowing, and that such action can reduce the live hearing from a crowded roster of accumulated motions to a smaller set of organized substantive segments.

The safety dimension is therefore inseparable from case management. Plaintiffs’ filings already connect the “Ask-Harm Loop” to documented severe clinical injury, including a PCL-5 score of 76/80, and describe a record in which requests for fairness, access, and correction have repeatedly been answered with escalating burden, delay, and narrative distortion. In that environment, a pre-hearing order that secures accommodations, preserves collectibility, and confirms stable assignment establishes the protective frame within which truthful adjudication can proceed.

The public-integrity dimension is also already before the Court. Exhibit B describes this matter as a compact local test of a larger national pattern: private extraction incentives, procedural inequality for pro se parties, regulatory friction, policy conflict, and media silence aligning around a live dispute until supervisory visibility forces reconciliation with the record. Plaintiffs present that systems frame here for a practical reason: once a false narrative sustained by multiple institutions begins to fail, the period immediately surrounding acknowledgment is the period in which both retaliation risk and asset-flight risk rise most sharply.

This Court's role is therefore uniquely important. Judge Wheeler's assignment already reflects the judiciary's own recognition that stable neutrality is needed here, and continuity under this Court offers the most direct route to restoring procedural legitimacy while the Supreme Court's supervisory record remains open. Plaintiffs respectfully request that the Court use the present filing as the off-ramp identified in the concurrently filed Supreme Court supplement: grant the access relief; regularize the pleading; narrow the facts; preserve the asset base; streamline the May 28 hearing; and keep the matter under a single coherent judicial hand through trial-setting and the next pleading stage.

The sections that follow present those requests in the order most likely to restore function before further escalation occurs: immediate ADA ruling and hearing-access election; regularization of the Second Amended Complaint; Temporary Restraining

Order and related preservation relief; reorganization of the May 28 roster; continuity of assignment; and the referral relief requested on the predicate facts already established in the record.

## **I. PLAINTIFFS' POSTURE AND THE PURPOSE OF THE "WHISTLEBLOWER" LABEL**

**In explanation of Plaintiff McNeil's posture with the case**, the Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference, Filed February 10, 2026 in 2025-CP-10-05095, states *"The behavior of defense aligns with research on the negative effects of status bias - research shows established members of a field have reduced performance and default to rigid behaviors when their perceived status difference with an individual is not met with a concurrent lower performance. But Plaintiff Chris McNeil honors the principle of justice and equity at the heart of the legal professional and has intended his unexpected competence level not as an affront but as a service to the Court and to housing justice by a professional whose parallel expertise in systems interventions and strategic communication is relevant to the evidentiary record."*

That introduction has 3 sections covering

1. Alignment With Court and Purpose of Legal Institution,
2. The Unintended Duration, and
3. Additional Perspective: Systems Study from the Vulnerable Tenant's Perspective,

and is provided in full for convenience in EXHIBIT A.

**Whistleblower definition in this context and acknowledgment.** Plaintiffs use the term "whistleblower" in this filing strictly to define Plaintiff McNeil's role within the systems model - the party closest to the evidence who makes previously invisible patterns visible so that the system can correct itself. Plaintiffs acknowledge that the term does not function as a legal definition available to Plaintiff McNeil under South Carolina or federal whistleblower-protection statutes in this posture; Plaintiffs use it only as a systems-analytic label because it enables better prediction of future system behavior and identifies where corrective intervention is most efficient. The predictive point is specific: **in false-frame systems, the party closest to the evidence is subjected to a sequence of initial minimization, character reframing, institutional delay, and selective process enforcement until outside supervisory attention breaks the loop.** The Supreme Court's April 28 return-request letter is the outside supervisory attention arriving in this matter. [EXHIBIT A: Explanation of Plaintiff's Pro Se Posture and Consultant Role.]

## **II. PRESENT PROCEDURAL POSTURE**

### **APPARENT CONSTITUTIONAL VIOLATIONS REQUIRING JUDICIAL CORRECTION**

Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer respectfully submit this Notice and Request in advance of the May 28, 2026 hearing before the Honorable Will Wheeler. In spite of its consistent characterization as such by defense, the case before this Court is not, in its current posture, a routine landlord-tenant dispute. The record now establishes three intersecting constitutional and structural failures that require this Court's awareness before any motion is reached on the merits:

**A. Fourteenth Amendment Equal Protection Violations.** The U.S. Constitution guarantees equal access to the courts regardless of representation status. The documentary record in this case establishes a pattern of differential treatment between represented defense counsel and pro se Plaintiffs that meets the Canon 3(E) standard for the appearance of partiality and raises a substantial Equal Protection question:

- The October 7, 2025 returned-orders directive instructed Plaintiffs to file motions without proposed orders and wait for hearings. Plaintiffs complied. Plaintiffs' motions were scheduled for hearing twice—December 19, 2025 and April 3, 2026. Both hearings were continued by Judge McCoy, the first on a consent representation that Plaintiffs documented as fabricated in their filed opposition, and the second displaced by a March 26, 2026 administrative letter raising an assignment question that had already been resolved at the February 9, 2026 scheduling conference. The resulting 199+ day motion blackout prompted the South Carolina Supreme Court's April 28, 2026 return-request letter in Appellate Case No. 2026-000919.
- On April 2, 2026, defense counsel submitted a proposed order with a routine motion. It was signed within five business days.
- Chambers staff have been documented selectively filtering Plaintiffs' safety filings under misapplied "ex parte" classifications while informally advancing remote-appearance accommodations for defense counsel (March 27, 2026 Supplemental Notice).

These are not isolated administrative choices. Taken together, they establish a procedural architecture in which institutional status—not the merits—has determined which filings move

and which do not. [EXHIBIT F Plaintiff's Motion for Recusal of the Honorable Jennifer McCoy]

**B. Court Collusion With the Defense's "Didn't Happen" False Frame.** The defense's primary litigation strategy has been to gaslight the docket: to litigate as if the falsified federal postmark, the 21-platform image syndication, the LLR obstruction, and seven of the eight original harms simply did not occur. That strategy could not survive a court that ruled on the evidence already filed. The local court's pattern of open-ended continuances—including the December 1, 2025 Order of Continuance and the March 26, 2026 displacement of the April 3, 2026 hearings - has functioned, regardless of subjective intent, to provide the procedural cover that strategy requires. The Supreme Court is now watching because the local administration was not doing its job.

**C. Structural Pro Se Discrimination Baked Into the System Design.** Beyond the documented conduct of specific judicial officers and staff, the Charleston Common Pleas system architecture itself creates a constitutionally suspect two-tier access regime. Pro se litigants are excluded from electronic filing - a privilege reserved exclusively for attorneys in South Carolina - and are instead required to hand-file paper documents at the Clerk's office in tourism-congested downtown Charleston. The practical consequences are severe and visible:

- **Visual degradation.** The Clerk's scanner converts color screenshots and evidentiary photographs into streaky black-and-white line drawings, destroying forensic detail critical to Plaintiffs' privacy-invasion and image-syndication claims. Defense e-filings arrive in full color with an "ELECTRONICALLY FILED" watermark that signals institutional legitimacy. Pro se filings arrive looking like photocopies of photocopies. [EXHIBIT E :

Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]

- **Filing friction.** Each filing requires driving into downtown Charleston, finding scarce and expensive parking, walking through congested streets and courthouse security, waiting for documents to be stamped, and repeating the entire process for proof-of-service documents that must be filed on a separate trip. A single filing-and-service cycle consumes a minimum of two hours. For counsel, the identical process is one click.

[EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]

- **Text searchability.** E-filed documents are natively text-searchable. Hand-filed scans are image files—meaning a judge or clerk searching the docket electronically for key terms will find only counsel's filings, rendering pro se filings functionally invisible to keyword-based review. [EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]
- **The Supreme Court's own practice refutes the stated justification.** South Carolina excludes pro se filers from e-filing on the stated premise that lay persons lack technical sophistication. Yet the South Carolina Supreme Court itself provided Plaintiffs with an email address for filing, accepted electronic submissions promptly, was courteous and helpful by phone, and docketed Plaintiffs' Petition for Writ of Mandamus—then acted on it within 14 days. The technical-sophistication rationale is a fiction that operates as structural discrimination.

This two-tier architecture does more than inconvenience pro se litigants. It marks their filings as visually inferior at a glance, degrades evidentiary quality, increases physical and time burden by

orders of magnitude, and creates a system in which institutional actors can more easily ignore or deprioritize pro se work product. It is the physical infrastructure of the "Justice Requires Status" false frame identified in the Venn Diagram. [EXHIBIT B: Whistleblower Revelations Report; EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]

**D. The Reason Judge Wheeler Is Here.** Plaintiffs understand that Judge Wheeler has been brought into this matter precisely because the structural neutrality of the Ninth Circuit administration in this case has been called into question at the state level. Plaintiffs ask that this Court recognize the litigation environment that triggered the SC Supreme Court Return Request and refuse to return Plaintiffs to it. The evidence supporting every claim in this Notice is already on the docket - much of it placed there by Plaintiffs' March 6, 2026 Systems Analysis Brief in Aid of Judicial Efficiency, and its accompanying exhibits, specifically to bypass the local docket's selective gating that has held up granting leave for the Second Amended Complaint, which is "freely given when justice so requires" per SC law, for 199 days at the time of filing this, and unopposed for 179 of those days.

The remainder of this Notice describes Plaintiffs' posture, identifies the three false frames sustaining the defense's position, and offers Judge Wheeler a clear, precedent-supported path to and through the May 28 hearing.

### **III. IMMEDIATE ADA RULING AND IN-PERSON PARTICIPATION ELECTION**

Plaintiffs' Supplemental Motion for ADA Accommodations has been pending since January 30, 2026 - 101 days as of this filing. The record documents severe clinical harm, including a PCL-5 PTSD score of 76/80, arising directly from litigation conditions; access and safety therefore sit squarely before the Court as ministerial ADA matters once disability and reasonableness are established, both of which are documented on the record.

Plaintiffs respectfully request an immediate chambers ruling granting the pending accommodations, including electronic filing access, remote-appearance parity, scanner and graphic-preservation accommodations, and any related service or filing accommodations the Court finds necessary to ensure equal access through and including the May 28 hearing.

Election regarding the May 28 hearing itself: Plaintiffs elect, consistent with the accommodations granted, to appear in person at the May 28 hearing. The decision is made with full awareness of the documented clinical risk. Plaintiffs make it because the May 28 hearing will be the first occasion on which Plaintiffs and the defense actors whose documented conduct produced the injury appear in the same physical room before a judicial officer empowered to act. Congruence between word, body, and record is most visible in person; Plaintiffs' capacity to stand in that congruence, and the Court's capacity to observe the contrast between the parties' respective postures in person, are each a meaningful contribution to an accurate record. Plaintiffs therefore request that the granted accommodations operate as a floor rather than a ceiling: remote appearance remains available as a fallback if clinical conditions on May 28 require it, but the primary election is in-person attendance, with supportive accommodations (e.g., a brief mid-session break if needed, a seat positioned to reduce startle response, and a clear protocol for prose digital exhibit display) in place to make that attendance sustainable.

## **IV. MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT - REGULARIZE BEFORE HEARING**

Plaintiffs' Motion for Leave to File the Second Amended Complaint has now been pending 199 days. Defendant SAC 181's opposition memorandum appeared on April 21, 2026 - 179 days after its filing, and one week after all defense counsel was CC'ed on an email thread serving Judge Van Slambrook, Judge Rode's and Judge McCoy's chambers with notification the Petition for Writ of Mandamus was received and docketed by the SC Supreme Court on April 14, 2026 (Case No. 2026-000919). The opposition engages none of the evidentiary record supporting the proposed pleading.

Plaintiffs respectfully request that the Court, on the briefs and without further hearing:

**A. Strike SAC 181's April 21, 2026 opposition** as untimely and as engaging no merits, or otherwise disregard it as dilatory;

**B. Grant leave to file the Second Amended Complaint**, which adds Charles S. Altman as an individual defendant and adds the image-syndication invasion-of-privacy counts that are central to the documented harms;

**C. Shorten the answer period to ten (10) days from service** so that pleadings close before or as near as practicable to May 28; and

**D. In the alternative to a ruling on the briefs, deem the Second Amended Complaint granted** in light of the 199-day (179-day unopposed) delay, pursuant to this Court's supervisory power and consistent with SCRCF Rule 15(a)'s directive that leave "shall be freely given when justice so requires."

# **V. REQUEST FOR TEMPORARY RESTRAINING ORDER (STATUS QUO INJUNCTION) AND COURT- ORDERED FORENSIC AUDIT - ALTMAN- CONTROLLED ENTITY CLUSTER**

## **A. Why a TRO is warranted now, before May 28**

The record already contains verified evidence that the flight of capital has begun:

1. December 3 and 11, 2025: Plaintiffs file the Probate Valuation Memorandum and Supplemental Memorandum, placing on the public record the gap between a sworn \$251,000 per-share probate valuation and a documented portfolio exposure in the tens of millions.
2. January 12, 2026: Charles S. Altman executes a satisfaction of mortgage on 39 Wappoo Creek Place - approximately seventeen months early, post-Amended-Complaint, and after the Second Amended Complaint naming him individually was on the docket and before leave was granted. The transaction converts liquid, auditable cash into residential equity that is highly protected under South Carolina homestead doctrine and therefore largely outside the reach of post-judgment collection.
3. April 28, 2026: The Supreme Court's return-request letter places the selective-action pattern before the highest court in the State. The defense is now on notice that the local procedural shield has become visible as a matter of supervisory record.

The arithmetic is unforgiving. Three weeks remain between this Notice and the May 28 hearing.

In that window, quitclaim deeds, inter-entity cash transfers, and further conversion of non-

exempt assets into protected forms are each completable in days. Giving Defendants three weeks of notice of an asset-freeze hearing is the very event most likely to trigger the asset flight the freeze is designed to prevent.

## **B. Scope of the requested TRO**

Plaintiffs request, pursuant to SCRCP 65(b) and this Court's equitable authority, a Temporary Restraining Order / Status Quo Injunction enjoining Charles S. Altman, Jonathan S. Altman, and any entity in which either holds an ownership, Registered Agent, beneficial-ownership, or controlling-management interest, from:

- (i) selling, transferring, assigning, encumbering, or creating any new lien on any real property;
- (ii) executing any cash transfer outside the ordinary course of business, including any inter-entity transfer, loan, capital contribution, or distribution that is not documented in contemporaneous business records as a recurring, ordinary operating expense; and
- (iii) converting non-exempt assets into protected or exempt forms (including further mortgage payoffs, retirement-account contributions, or trust transfers) pending the May 28 hearing and any subsequent Rule 16 scheduling order.

Ordinary course operations - payroll, recurring utilities, recurring vendor payments, routine property maintenance, and the like - remain entirely unaffected. The request is calibrated to preserve the status quo, not to interfere with the operation of any functioning business.

Entities specifically identified on the present record include (but are not limited to): SAC 181, LLC; Meridian Residential Group, LLC; MRG Investing Company, LLC; 98-100 Market Street, LLC; Charles Realty Company, Inc.; 1801 Reynolds, LLC; BST 2009, LLC; TBBS 2009, LLC;

Knightsville Four 2010, LLC; Derfner Altman, LLC; Altman Coker, LLC; and the parcels held by those entities, including without limitation 39 Wappoo Creek Place; 18 Lavington Road; 181 Gordon Street; 171 and 177 Gordon Street; and 8310 Rivers Avenue Unit B.

### **C. Why the entity cluster rather than named defendants alone**

The Second Amended Complaint adds Charles S. Altman individually and pleads enterprise liability and veil-piercing. The record supports the inference that Charles S. Altman exercises singular, operational control across this entity cluster: commingled check addresses, shared registered-agent filings, parallel mailing addresses, probate-filing patterns, and the documented Flash Transfer all point to a single operational hand moving assets between entities. A transfer from SAC 181, LLC to 1801 Reynolds, LLC, or from Charles Realty Company, Inc. to a peripheral entity, is functionally a transfer from one Altman pocket to another. The TRO scope tracks that operational reality and prevents Defendants from using the entity structure to defeat the collectibility of a judgment.

### **D. Court-ordered forensic audit**

Plaintiffs further request that the Court order a forensic audit, at Defendants' expense, of the Altman-controlled entity cluster, conducted by an independent forensic accountant agreed upon by the parties or appointed by the Court. The Charles S. Altman registered-agent footprint alone spans approximately sixty-two entities; the Jonathan S. Altman footprint adds approximately forty-one additional entities. Audit scope should include:

(i) the Schedule F valuation pattern across the Israel/Edith/Samuel Altman estate sequence, including the 95.4% per-share CRC devaluation;

(ii) the per-share valuation trajectory of Charles Realty Company, Inc. and related holding entities;

(iii) bilingual Register of Deeds indexing artifacts and the Orangeburg insider conveyance pattern;

(iv) inter-entity transfer histories, with particular attention to the 12-month window preceding and the window following the filing of the Amended Complaint on September 15, 2025; and

(v) the January 12, 2026 mortgage-payoff transaction and related source-of-funds analysis.

#### **E. Fallback relief**

Should the Court decline the full TRO, Plaintiffs respectfully request, as immediate fallback relief:

1. A Notice Order requiring Defendants and the identified entities to provide the Court and Plaintiffs with fourteen (14) days' written notice before executing any sale, transfer, encumbrance, or new lien on any real property, or any extraordinary cash transfer;
2. Expedited forensic discovery into the banking records, transfer histories, and entity-governance records of SAC 181, LLC, Meridian Residential Group, LLC, Charles S. Altman individually, and Jonathan S. Altman individually, on a fourteen-day production schedule; and
3. Preservation orders directed to third-party financial institutions identified in the existing Synovus subpoena and in any related deposit, mortgage, or brokerage relationships.

## **VI. MAY 28, 2026 HEARING ROSTER REVISION**

### **RECOMMENDATIONS**

The May 28, 2026 hearing inherits a roster of motions that have accumulated in part because of the procedural asymmetries described in Section I. Plaintiffs respectfully offer the Court two organizing tables. The first identifies pre-hearing matters that, in Plaintiffs' view, the record now supports being addressed administratively or by short order before the hearing convenes. The second sets out Plaintiffs' stance on each motion currently on the May 28 roster, with the procedural authority that supports it. Plaintiffs offer these as a clarifying aid; the Court retains full discretion over its own docket.

**Table A — Pre-Hearing Matters Ripe for Administrative Resolution**

| # | Matter                                             | One-Sentence Basis                                                                                                                                                                                                                                   | Filed / Supported By                                        |
|---|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 1 | Immediately Grant Pending ADA Accommodations       | Plaintiff McNeil's clinical PTSD (PCL-5: 76/80) and reduced functional capacity require e-filing access and remote-appearance authorization; the request has been on the docket since January 2026 and aligns with the March 27 Supplemental Notice. | Supp. ADA Motion, 1/30/26; Supp. Notice, 3/27/26            |
| 2 | Grant Leave to File Second Amended Complaint (2AC) | Pending 199+ days unopposed; Rule 15(a) mandates leave "freely given when justice so requires"; consolidates the 21 image-exploitation counts and adds Charles S. Altman individually for veil-piercing on facts noticed since December 2025.        | Motion for Leave, 10/24/25; Brief in Aid of Safety, 3/20/26 |
| 3 | Deemed Admissions Under SCRCP Rule 36(a)           | The December 23, 2025 Motion for Determination of Sufficiency of RFA Responses has been pending without substantive defense response; Rule 36(a) provides that evasive or insufficient responses are deemed admitted upon motion.                    | RFA Sufficiency Motion, 12/23/25; Omnibus Brief, 2/24/26    |

| # | Matter                                                     | One-Sentence Basis                                                                                                                                                                                           | Filed / Supported By            |
|---|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| 4 | Recognition of March 6, 2026 Filing as Operative Framework | The Brief in Aid of Safety Risk Mitigation and Judicial Clarity, with Exhibits A1–A3, B, and C, is on the docket and unopposed on the merits; it provides the single-read organizing framework for the case. | Brief in Aid of Safety, 3/20/26 |

**Table B — Plaintiffs' Stance on Motions Currently Set for May 28, 2026**

| Noticed Motion                   | Filed By                | Plaintiffs' Stance                                                                                                                                                                                         | Procedural Basis                                            |
|----------------------------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Motion to Quash Synovus Subpoena | Defense (Phelps Dunbar) | <b>Oppose; deny.</b> Quash motion was filed outside the SCRCF 45(d)(2)(B) window, waived under <i>Ex parte Smith</i> , 407 S.C. 422 (2014); the records are directly relevant to veil-piercing (Count VI). | Cross-Motion to Disqualify, 1/14/26; Omnibus Brief, 2/24/26 |
| Motion to Quash LLR Deposition   | Defense                 | <b>Oppose; deny.</b> The LLR investigation is central to the regulatory obstruction documented in Exhibit C of the March 6 Brief; LLR counsel's presence is appropriate.                                   | Brief in Aid of Safety, Ex. C, 3/20/26                      |
| Motion to Stay (Joinder)         | Defense                 | <b>Rendered moot if pre-hearing matters in Table A resolve.</b> A stay presupposes contested claims; deemed admissions and Rule 15(a) leave eliminate the basis for delay.                                 | Omnibus Brief, 2/24/26                                      |
| Motion to Cancel Lis Pendens     | Defense (SAC 181)       | <b>Oppose; deny.</b> The Lis Pendens is properly grounded in the veil-piercing and probate-fraud claims pled in the Amended Complaint and elaborated in the 2AC; cancellation would                        | Probate Memo, 12/3/25; Supp. Memo, 12/11/25                 |

| Noticed Motion                                                               | Filed By   | Plaintiffs' Stance                                                                                                                                               | Procedural Basis                    |
|------------------------------------------------------------------------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
|                                                                              |            | prejudice judgment collectibility.                                                                                                                               |                                     |
| Cross-Motions to Disqualify Defense Counsel (Phelps Dunbar; Resnick & Louis) | Plaintiffs | <b>Sustain.</b> RPC 1.7(b)(3) unconsentable conflicts; documented captured-counsel dynamic blocking evidence supporting their own clients' separateness defense. | Cross-Motion to Disqualify, 1/14/26 |
| Motion for Recusal of Hon. Jennifer B. McCoy                                 | Plaintiffs | <b>Sustain.</b> Canon 3(E) appearance standard met by documented procedural asymmetry, the Dennis-clerkship intersection, and continuance pattern.               | Motion for Recusal, 5/7/26          |
| Notice of Permanent Withdrawal from Settlement                               | Plaintiffs | <b>For the record.</b> Trial is now the sole disposition path; supports request for date-certain Fall 2026 trial setting.                                        | Notice of Withdrawal, 5/1/26        |
| Plaintiffs' Request for Date-Certain Fall 2026 Trial                         | Plaintiffs | <b>Sustain.</b> Open-ended scheduling functions as a harm multiplier under the documented system conditions; date-certain setting is the requested boundary.     | This Notice, § V                    |

Plaintiffs respectfully submit these tables as an organization aid. The procedural authority supporting each item rests on filings already on the docket and on the South Carolina Rules of Civil Procedure as applied to those filings. Plaintiffs ask the Court to recognize that the path to a clean, constitutionally sound May 28 hearing runs through the matters in Table A, and that the Court's awareness of Plaintiffs' stance in Table B is offered to streamline, not direct, the proceedings.

Exhibit C provides a Current Versus Recommended Roster Table that, for each of the 26 matters on the May 28 published roster and four supplemental case-management matters not yet on the roster, identifies (a) the filing date, (b) the recommended pre-hearing act, (c) the effect of that

act, (d) the recommended within-hearing treatment, and (e) the predictable defense point each treatment answers. Of the 30 total matters, eight are flagged as pre-hearing priority candidates whose disposition before May 28 would collapse the live roster from 26 motions to approximately 8–10 substantive segments, restoring function to the hearing and preserving collectibility of any judgment. [Exhibit C Current Versus Recommended Roster Table for May 28, 2026 Hearing]

## **VII. SAFETY, UNCLEAN HANDS, AND THE CASE FOR THIS SEQUENCE**

This sequence is supported by the record of Defendants' unclean hands. Defendants have repeatedly sought advantage from delay, fragmentation, discovery resistance, and procedural asymmetry while core Plaintiff motions remained unheard for months and while ADA-related needs remained unresolved. Under those circumstances, Defendants should not receive further benefit from arguing derivative stay, quash, dismissal, or sanctions motions before the Court first resolves the threshold matters that clarify the pleading, narrow the facts, restore equal access, and preserve the collectibility of any judgment.

Plaintiffs have prepared a Whistleblower Revelations Report documenting the public-interest dimension of this case - the CRE-development / law / politics / tenant-exploitation cluster, the institutional-enabler pattern, and the captured-system false-frame dynamics that parallel the Theranos, Enron, and Wells Fargo whistleblower precedents. That Report serves as the basis for national investigative journalism outreach intended as both mitigation for damages by raising awareness of the power of the platform that created the Housing Justice Audit, and mitigating

safety risks through public attention on the case, and to accompany this Notice as an exhibit to a SC Supreme Court Supplement to the Petition for Writ of Mandamus therefor placing the case's public-interest dimension on the continuous record before both this Court and the Supreme Court. [Exhibit B: Whistleblower Report: False-Frame Collapse, System Capture, and Public-Interest Implications in McNeil & Poyer v. SAC 181 et al]

The unclean-hands record is not limited to procedural conduct. The same window in which core Plaintiff motions sat unrulred produced documented asset-side conduct consistent with the very judgment-evasion concerns the pending Lis Pendens and TRO request are designed to prevent. The December 3 and 11, 2025 Probate Valuation Memorandum and Supplemental Memorandum placed before the Court a sworn \$251,000 per-share probate valuation set against documented portfolio exposure in the tens of millions. Approximately one month later, on January 12, 2026 - post - Amended-Complaint, and with the Motion for Leave to File the Second Amended Complaint naming Charles S. Altman individually already on the docket - Charles S. Altman executed a satisfaction of mortgage on 39 Wappoo Creek Place approximately seventeen months in advance of the 2017 instrument's maturity schedule, converting liquid auditable cash into residential equity highly protected under South Carolina homestead doctrine and substantially outside the reach of post-judgment collection. [Exhibit D: Charles S. Altman January 12, 2026 Early Mortgage Payoff on 39 Wappoo Creek Place; underlying 2017 Mortgage Instrument.]

## **VIII. CONTINUITY OF JUDGE WHEELER'S ASSIGNMENT AND CONTINUED SUPREME COURT SUPERVISION**

The April 28, 2026 return-request letter from the Supreme Court of South Carolina in Appellate Case No. 2026-000919 placed the long term motion blackout pattern under active supervisory review at the highest court in this State. On April 29, 2026, Plaintiffs emailed a written recusal request to the Honorable Jennifer Blanchard McCoy that documented the fabricated-consent continuance of December 19, 2025 and the demonstrably-false administrative-assignment predicate underlying the March 26, 2026 indefinite continuance of the April 3, 2026 hearings. Judge McCoy has not responded to that recusal request as of the filing of this Notice - a non-response that occurred after the Supreme Court's return-request letter was already on the public docket and after Judge McCoy was personally cc'ed on the email thread serving the SCSC return-request to all counsel of record. The non-response itself, occurring under direct Supreme Court supervision, demonstrates that the local procedural environment that produced the original blackout has not corrected, and confirms that returning this case to the rotating Ninth Circuit bench would predictably reproduce the conditions the Supreme Court is currently reviewing.

**Plaintiffs respectfully request that this Court enter a continuity order** providing that:

- (i) Judge Wheeler retain assignment over this matter through trial, including all pre-trial motions, scheduling orders, and any subsequent amended-complaint proceedings, pursuant to this Court's institutional interest in stable adjudication of a case under active Supreme Court supervisory review;
- (ii) the Clerk of Court serve a copy of any order entered pursuant to this Notice on the Supreme Court of South Carolina in Appellate Case No. 2026-000919, so that the supervisory record continues to reflect the actions taken in this matter; and

(iii) all subsequent motion practice in this action, including matters arising from any amended pleading, remain on Judge Wheeler's docket under the same continuity-of-assignment principle.

**Why continuity matters.** Judge Wheeler's assignment was itself the institutional response to the structural neutrality concerns the SCSC return-request letter placed on the record. Continuity of Judge Wheeler's assignment, paired with continued SCSC docket supervision, replaces the broken structural condition with a sound one and preserves the integrity of the supervisory architecture across the full arc of this litigation, including the pleadings stages still ahead.

## **IX. JUDICIAL REFERRAL TO INVESTIGATIVE AND DISCIPLINARY AUTHORITIES**

The record now before this Court contains predicate facts for three categories of conduct that exceed the boundaries of civil discovery abuse and enter the territory of completed criminal acts under South Carolina and federal law. Plaintiffs respectfully ask the Court to exercise its institutional referral authority - distinct from, and considerably more weighty than, a private citizen complaint - to place these matters before the agencies statutorily charged with their investigation, and to enter a continuity-of-assignment order that preserves the supervisory architecture the Supreme Court of South Carolina established through its April 28, 2026 return-request letter in Appellate Case No. 2026-000919.

### **A. Why a Judicial Referral, and Why Now**

A referral signed by this Court arrives at SLED and at the United States Attorney's Office accompanied by a presumption of evidentiary seriousness that no pro se citizen complaint can

replicate, particularly where the complainant is a documented severe-PTSD litigant whose injury was inflicted by the very actors being referred. The referral also creates the formal predicate by which evidence developed in the criminal track becomes accessible to the civil docket through ordinary inter-agency channels, closing the evidentiary gap that has otherwise required Plaintiffs to subpoena each fact independently against coordinated obstruction. Judicial referral additionally insulates the Court's own record: once SLED is engaged, further obstruction by Defendants or their counsel becomes obstruction of an active state criminal investigation under § 16-9-340, materially elevating the deterrent effect this Court has been unable to achieve through Rule 37 alone.

## **B. Predicate One - Falsified Federal Postal Documentation (Forgery and Wire Fraud)**

The Amended Complaint and the Second Amended Complaint pleadings on file establish that Defendants transmitted a document bearing an "EMAILED" stamp formatted to mimic a USPS postmark, used as evidentiary support for compliance with S.C. Code § 27-40-410's deposit-return timing requirement. The fabricated postal indicium was transmitted across state lines via electronic communication, and Defendants relied upon it to retain funds otherwise owed to Plaintiffs. The conduct satisfies the statutory elements of:

- S.C. Code § 16-13-10 (forgery of writing affecting financial obligation)
- S.C. Code § 16-13-240 (obtaining property by false pretenses, felony where the value exceeds \$2,000)
- 18 U.S.C. § 1343 (wire fraud, federal felony, predicate already alleged in the operative pleading)

- 18 U.S.C. § 1341 (mail fraud, where the fabricated indicium imitates a federal postal instrument)

### **C. Predicate Two - Witness Tampering and Obstruction of an Authorized Investigation**

The January 9 and January 12, 2026 AppFolio communications, already on the docket, establish that Meridian sent "formal notice" to a third-party records custodian instructing deferral of subpoena compliance, with the explicit effect of preventing LLR Lead Investigator J. Watson Wharton III from receiving evidence before the February 20, 2026 statutory deadline. AppFolio's own confirmation language satisfies the obstruction element on its face. The conduct satisfies the elements of:

- S.C. Code § 16-9-340 (obstruction of law enforcement, felony)
- 18 U.S.C. § 1512(b)(3) (federal witness tampering, where the underlying matter is wire fraud)
- S.C. Code § 40-57-340(3) (PMIC obstructing investigation into licensee's own conduct)

### **D. Predicate Three - Long-Term Coordinated Harassment of Plaintiffs by Tara Bayles and Her Agents**

The record establishes a continuous, escalating campaign of psychological coercion directed at Plaintiff McNeil and Plaintiff Poyer that begins on September 6, 2024 and continues through the filings before this Court today. The campaign originated with a disorienting email authored by Tara Bayles, PMIC, which mischaracterized the role

of her co-defendant husband Adam W. Bayles at Meridian. It expanded through Meridian employee mischaracterizations of landlord-tenant law then through the harassment and gaslighting of Plaintiff McNeil through multiple-coordinated agents of two law firms and an insurance company.

Meridian employees Stephanie Phillips and Dana DeVoe-Riddick both sent documented mischaracterizations to Plaintiffs via email. Attorneys Kevin O'Brien and Justine Tate of Phelps Dunbar and Alicia Bolyard of Resnick & Louis all participated in group gaslighting, harassment, mischaracterizations, and attempted bullying of Plaintiff McNeil from October 2025.

The January 26, 2026 Criminal Complaint Summary Proffer to the Charleston County Sheriff's Office places at the center of the second-degree harassment predicate under S.C. Code § 16-3-1700. The proffer documents this as a documented continuity of purpose from September 2024 to January 2026. It produced a gaslighting-severity score of 79/80 based on equivalent clinical tests as well as physical manifestations including falls and PTSD symptoms at complainant's residence.

### **The Conduct Satisfies the Statutory Elements Of**

- S.C. Code § 16-3-1700 - harassment in the second degree, with the September 6, 2024 originating email establishing the continuity-of-purpose anchor and the

79/80 clinical gaslighting-severity score establishing the criminal-harm element.

- S.C. Code § 16-9-340 - obstruction of law enforcement, where the documented February 9, 2026 on-record statement by defense counsel regarding direct contact with the Charleston County Sheriff's Office during the CCSO Case No. 2026-001263 closure window establishes the obstruction predicate.
- S.C. RPC 1.7, 3.4, and 8.4 - unconsentable conflicts, fairness to opposing party and counsel, and misconduct, where each individual attorney involved maintains a documented role in the harassment-extension pattern and where the firm-level conflicts identified in Plaintiffs' January 14, 2026 cross-motion to disqualify remain on the docket without substantive response.
- 18 U.S.C. § 1512(b) - federal witness tampering, where the harassment campaign operates concurrently with the falsified-postmark and witness-tampering predicates identified in Sections IX.B and IX.C above and is directed at suppressing Plaintiffs' continued evidentiary participation.

### **Why This Predicate Belongs in the Referral Package**

The forgery predicate (IX.B) and the AppFolio-LLR obstruction predicate (IX.C) are discrete completed acts measured in days and weeks. The harassment predicate documented here is the connective tissue that carries the originating September 6, 2024 conduct across nineteen months of escalating coordination, picks up additional

named agents as each new institutional layer engages, and produces the clinical injury the PCL-5 7680 score and the November 2025 falls at Plaintiffs' residence establish on the record. A referral package that addresses only the discrete acts and omits the harassment continuity leaves the most clinically severe injury — and the most prosecutorially probative pattern evidence — outside the agencies' field of view.

### **E. Why Judicial Referral to SLED Is Necessary: The Documented Failure of the Charleston County Sheriff's Office Pathway**

The May 1, 2026 Notice of Permanent Withdrawal characterizes this matter as one in which "the local judicial apparatus has proven either unable or unwilling to protect a disabled pro se litigant from coordinated defense lawfare". The same structural capture extends to the local criminal-investigation pathway, and the record now permits this Court to take judicial notice of the predicate facts that make a SLED referral the only viable route forward.

**The proffer and the opening of the case.** On January 26, 2026, Plaintiff McNeil filed a Criminal Complaint Summary (Proffer) with the Charleston County Sheriff's Office identifying Tara Bayles as the suspect in three categories of completed criminal conduct: forgery and false-pretenses obtaining of property over \$2,000 under S.C. Code §§ 16-13-10 and 16-13-240 (felony), harassment in the second degree under § 16-3-1700, and common-law obstruction of justice. CCSO accepted the proffer, opened Case No. 2026-001263, and a deputy was assigned. Plaintiff McNeil sent a same-day Courtesy Notice to the Altman principals and to defense counsel of record disclosing the case number and the evidentiary scope.

**The closure pattern.** Within days of defense counsel becoming aware of the criminal complaint - and after the January 27, 2026 emergency-status email from Phelps Dunbar, in which counsel characterized the courtesy notice as "threats" - the CCSO pathway was foreclosed in three documented exchanges:

- A victim advocate identifying herself as "Dierra" stated to Plaintiff McNeil, in substance, "we don't help people like you".
- A second victim advocate in the same office stated, in substance, "I want to help but I can't go against my boss".
- Sergeant Hall, who had personally approved the report and authorized the case opening, subsequently closed the case and stated, in substance, "you chose to leave," followed by a representation that he would dispatch a deputy to collect additional evidence - a deputy who never appeared.

**The closure pattern, considered with the documented contact from defense counsel.** At the February 9, 2026 status conference, defense counsel Alicia Bolyard stated on the record that she "was told they had closed the case," establishing that defense counsel was in direct contact with someone at the Charleston County Sheriff's Office regarding CCSO Case No. 2026-001263 during the period the case was being closed. The closure that followed is most economically explained by a combination of three converging factors operating simultaneously: (i) defense counsel's direct contact with CCSO, in which the Tara-Bayles-sourced "deposit-timing dispute" minimization frame already documented across the civil docket was likely transmitted to the agency; (ii) the path-of-least-resistance disposition created when an external narrative aligns with the lower-effort outcome for the receiving institution; and (iii) the specific identity of the parties

whose exposure those closures protect - Charles S. Altman, named as an individual defendant in the Second Amended Complaint and the Registered Agent and beneficial owner-principal of current defendant SAC 181, LLC, and Jonathan S. Altman, his nephew, who signed under oath as Personal Representative of the Estate of Samuel H. Altman in the probate filings whose valuations now form the documented estoppel trap, who additionally serves on the Mayor's Homeownership Initiative Commission while privately holding - with his mother and sister, per Samuel H. Altman's Will - the 33% membership interest in SAC 181, LLC that the probate record establishes. The Charleston legal-and-real-estate network within which the Altman family operates touches the same institutional pathways through which a forgery, harassment, and obstruction complaint against their property manager would ordinarily travel, and the closures documented above are most economically explained by the reflexive protection that network extends to its insiders when the named complainant is a pro se tenant whose injury they themselves are alleged to have caused. Structural pro se bias and the broader captured-administration pattern documented in Sections II and IV remain operative as amplifiers, but the proximate causes of the closure pattern are the named-defendant exposure and the defense-sourced narrative transmitted directly to CCSO.

**The contemporaneous distortion of the record.** The same week that the CCSO pathway was being closed, defense counsel for SAC 181 transmitted a formal email to the Chief Administrative Judge's chambers characterizing the January 26 Courtesy Notice as containing "threats against lawyers" and to their "families". The full text of the Courtesy Notice is on the record and contains no such threat: the only reference to families is an invitation that counsel "consider discussions with their families" before deciding whether to remain in a matter generating criminal and Bar exposure.

Plaintiff Poyer, having read the underlying Courtesy Notice and the email exchange in full, transmitted her own response to the same chambers thread on January 30, 2026 stating directly that "there was no physical threat at all in Chris' email" and identifying the mischaracterization as part of the documented gaslighting pattern. The mischaracterization itself - entered into a court staff thread copying the Chief Administrative Judge - is on the docket as Exhibit to the March 27, 2026 Supplemental Notice.

**The named-defendant inference.** Two independent local pathways - the Common Pleas docket and the CCSO criminal docket - closed in the same direction within the same approximate window, against the same pro se complainant, regarding the same documented evidence, after the same defense counsel became aware that the criminal track had been activated. The most direct explanation, supported by the record, is the specific identity of the parties whose exposure those closures protect. Charles S. Altman is named as an individual defendant in the Second Amended Complaint pending before this Court and is the Registered Agent and beneficial owner-principal of SAC 181, LLC. Jonathan S. Altman, his nephew, signed under oath as Personal Representative of the Estate of Samuel H. Altman in the Charleston County Probate Court filings whose valuations now form the documented estoppel trap detailed in the December 3 and December 11, 2025 Memoranda already on this Court's docket. Jonathan S. Altman additionally serves on the Mayor's Homeownership Initiative Commission, currently advising on the Project 3500 affordable-housing initiative, while privately holding – via a trust shared with his sister and mother - 33% membership interest in SAC 181, LLC that the probate record establishes. Charles S. Altman and Jonathan S. Altman together operate within a Charleston legal-and-real-estate network that touches the same institutional pathways through which a

forgery, harassment, and obstruction complaint against their property manager would ordinarily travel.

The closures documented above are most economically explained by the reflexive protection that network extends to its insiders when the named complainant is a pro se tenant whose injury they themselves are alleged to have caused. Structural pro se bias and the broader captured-administration pattern documented in Sections II and IV remain operative as amplifiers, but the proximate cause of the closure pattern is the identity of the parties whose exposure it shields

**Why this makes a judicial SLED referral the necessary remedy.** The forgery, harassment, and obstruction predicates identified in the January 26, 2026 proffer remain uninvestigated as of the date of this Notice. SLED operates outside the Charleston County local-political ecosystem and possesses original investigative jurisdiction over public corruption, fraud, and obstruction matters of the type documented here. A referral originating from this Court, accompanied by the underlying record materials, removes the status-based filter that closed the local pathway and places the predicates before an investigator that is structurally insulated from the Charleston legal-and-real-estate network in which the Altman family operates. The referral does not require Plaintiff McNeil to re-enter the same victim-advocate office that has already obstructed his remedy seeking, an additional consideration in light of the documented PCL-5 76/80 trauma profile.

## **F. Sworn Declaration in Support of the CCSO Closure Facts**

Plaintiff James C. McNeil declares under penalty of perjury, pursuant to 28 U.S.C. § 1746 and S.C. Code § 19-1-180, that the following statements were made to him by phone in conversations

with the Charleston County Sheriff's Office and its Victim Advocate office during the period following the opening of CCSO Case No. 2026-001263: (1) by a victim advocate identifying herself as "Dierra," in substance, "we don't help people like you"; (2) by a second victim advocate in the same office, in substance, "I want to help but I can't go against my boss"; and (3) by Sergeant Hall, the supervising officer who had previously approved the opening of CCSO Case No. 2026-001263, in substance, "you chose to leave," followed by a representation that a deputy would be dispatched to collect additional evidence — a deputy who never appeared.

Executed this 10<sup>th</sup> day of May, 2026, at Charleston, South Carolina.

A handwritten signature in blue ink, consisting of a large, stylized 'R' followed by a smaller, more fluid signature, positioned above a horizontal line.

James C. ("Chris") McNeil, Pro Se

### **G. Specific Referral Relief Requested in This Section**

Plaintiffs respectfully request that the Court enter an order, contemporaneous with the orders requested in Sections III through VII, directing the Clerk of Court to transmit a certified copy of the operative pleadings, the December 3 and December 11, 2025 Memoranda, the January 14, 2026 Opposition with its AppFolio exhibits, and the March 20, 2026 Brief in Aid of Safety Risk Mitigation and Judicial Clarity, together with a short cover order from this Court, to:

1. The South Carolina Law Enforcement Division (SLED), for investigation of the forgery, obstruction, and breach-of-trust predicates identified above
2. The United States Attorney's Office for the District of South Carolina, for evaluation of the wire fraud, mail fraud, and witness-tampering predicates
3. The South Carolina Attorney General's Office, for the § 16-9-340 obstruction predicate against Meridian
4. The South Carolina Department of Labor, Licensing and Regulation, supplementing the existing PMIC investigation under § 40-57-340(3)
5. The South Carolina Bar Office of Disciplinary Counsel, for the SC RPC 1.7, 3.4, and 8.4 predicates against counsel of record identified in the January 14, 2026 cross-motion

Plaintiffs further request that the Court direct that any agency receiving this referral be authorized, upon written request and consistent with applicable confidentiality rules, to share investigative materials with this Court and with the parties in this civil action, so that the criminal track and the civil track may proceed in evidentiary parallel rather than in isolation. In light of the documented closure of CCSO Case No. 2026-001263 under the circumstances described in Section IX.E, Plaintiffs request that the Order of Referral identify SLED as the primary state criminal-investigation recipient and direct that any return of investigative findings be reported to this Court for inclusion in the civil record consistent with applicable confidentiality rules.

## **X. RELIEF REQUESTED**

Plaintiffs respectfully request that the Court:

**A.** Enter, on the papers and before May 28, 2026, each of the pre-hearing orders itemized in Sections III through V;

**B.** Enter the Temporary Restraining Order and forensic audit order described in Section V, effective immediately on entry, with the entity scope described therein;

**C.** Adopt the reorganized May 28 hearing sequence described in Section VI and set forth in Exhibit C;

**D.** Direct the Clerk to serve a copy of each order entered pursuant to this Notice on the South Carolina Supreme Court in Appellate Case No. 2026-000919;

**E.** Enter the Order of Referral described in Section IX, directing the Clerk to transmit certified copies of the identified record materials to SLED (as primary state criminal-investigation recipient), the United States Attorney's Office for the District of South Carolina, the South Carolina Attorney General, the South Carolina Department of Labor, Licensing and Regulation, and the South Carolina Bar Office of Disciplinary Counsel, with authorization for inter-agency information sharing consistent with applicable confidentiality rules and direction that any return of investigative findings be reported to this Court;

**F.** Enter the Continuity Order described in Section VIII, providing that Judge Wheeler retain assignment over this matter through trial and all subsequent amended-complaint proceedings, including any Third Amended Complaint adding outside-counsel defendants; and

**G.** Grant such further relief as the Court deems just and proper to restore orderly case administration, preserve asset collectibility, and place this matter on a date-certain path to a Charleston jury trial in Fall 2026

Respectfully submitted this 11<sup>th</sup> day of May 2026.



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# **EXHIBIT A**

## **Explanation of Plaintiff's Pro Se Posture and Consultant Role**

# **Explanation of Dual Role of Plaintiff McNeil:**

## ***Most Vulnerable Member (MVM) Pro Se* for Study and Intervention**

from

### **Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference Filed February 10, 2026 in 2025-CP-10-05095**

Plaintiffs respectfully submit this brief as a courtesy to the Court in advance of the February 9, 2026 WebEx scheduling conference. This brief addresses

- (I) Plaintiffs' pro se posture and its relevance to how we ended up needing an emergency hearing,
- (II) Documented harms necessitating emergency relief, and
- (III) The transparency, accountability, and safety and relief Plaintiffs seek.

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## **I. PLAINTIFFS' PRO SE POSTURE: STATEMENT OF PURPOSE**

### **A. Alignment With Court and Purpose of Legal Institution**

The behavior of defense aligns with research on the negative effects of status bias – research shows established members of a field have reduced performance and default to rigid behaviors when their perceived status difference with an individual is not met with a concurrent lower performance. But Plaintiff Chris McNeil honors the principle of justice and equity at the heart of the legal professional and has intended his unexpected competence level not as an affront but as a service to the Court and to housing justice by a professional whose parallel expertise in systems interventions and strategic communication is relevant to the evidentiary record. McNeil's role is analogous to an expert witness or non-witness strategic consultant - a comrade to the profession in adjacent fields, not an adversary seeking to replace it.

His goal is to support the Court's alignment with the principles of justice and fairness – especially access to justice to the vulnerable, which is a foundation of the credibility of the court, while contributing technical expertise that would otherwise be unavailable in a case of this complexity.

### **B. The Unintended Duration**

Plaintiffs did not intend to remain pro se through five months of complex litigation involving corporate veil-piercing, falsified postal evidence, retaliatory eviction, 25 or more platform privacy violations, and coordinated obstruction of a South Carolina LLR PMIC investigation. This case met the complexity threshold they had set for a handoff to counsel months ago.

However, the very conduct that makes representation necessary - defense counsel's documented pattern of coordinated denial, mischaracterization, and what researchers term institutional betrayal - also raised the standard of due diligence required before Plaintiffs could responsibly entrust this case to a firm.

Plaintiffs have developed and have just begun implementing a rigorous due diligence system designed to identify counsel whose integrity can be verified independently of polished brand presentation. They feel this is a necessary innovation when the firms in this case have demonstrated that professional credentials and institutional reputation do not reliably predict ethical conduct toward vulnerable parties. That process is underway and Plaintiffs reserve the right to retain counsel at any point. Due to the treatment of Mr. McNeil, Plaintiffs are also putting in place redundancy in the lead plaintiff position so a law firm might not be directed by Mr. McNeil but by Ms Poyer or an identified but as yet undisclosed third lead plaintiff in line.

Plaintiffs feel this redundancy with a law firm being lined up initially on standby are necessary to mitigate the defense's apparent attrition strategy. They cannot get rid of the case by getting rid of a person.

### **C. Additional Perspective: Systems Study from the Vulnerable Tenant's Perspective**

Plaintiff McNeil is a systems analyst and strategic communications consultant whose background includes expert witness testimony in internet communication technology. His approach to this litigation is informed in part by his training in the intervention methodology of John Seddon's Vanguard Method - a systems-thinking framework used in the United Kingdom study which redesigns public services by analyzing them from the end-user's point of view. *See* John Seddon, *Freedom from Command and Control* (2003); *see also* John Seddon, *Systems Thinking in the Public Sector* (2008) (documenting how service systems optimized for institutional convenience systematically fail end users).

McNeil has applied this methodology by occupying the role of the unrepresented vulnerable tenant seeking justice—not as simulation, but as lived experience - while simultaneously documenting the systemic friction points, institutional failures, and coordination patterns that would otherwise remain invisible. This dual perspective - participant *and* analyst - is the methodological core of Seddon's approach: you cannot understand a system's failures from outside the system; you must study demand from the user's point of view. This work is conducted with full respect for and adherence to the South Carolina Rules of Civil Procedure.

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End section quoting Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference

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# Precedent for Plaintiff McNeil's Consulting Role

McNeil is effectively merging three distinct professional disciplines that top-tier law firms usually outsource to separate consulting agencies. Here is the precedent for the kind of work he is doing, while adhering to the SC Rules of Civil Procedure as a Pro Se Plaintiff with co-plaintiff Meaghan Poyer:

## 1. Advanced Trial Consulting and "Reptile Theory"

His focus on the "Jury as Change Agent" and the psychological triggers of institutional indifference is the exact domain of high-end trial consultants (often sociologists and psychologists).

The most direct precedent for your strategy is the "**Reptile Theory**," developed by litigation consultant David Ball and attorney Don Keenan.

- **The Precedent:** Reptile Theory posits that to win massive, "nuclear" verdicts, a plaintiff must bypass the logical brain and appeal to the jury's survival instinct (the "reptile brain"). A consultant does this by demonstrating that the defendant's conduct isn't just a one-off mistake, but a **systemic danger to the community**.
- **The Overlap:** This is exactly what the Housing Justice Audit and "Ask-Harm Loop" do. They map how the "Passive Investing/Unconscious Abdication" model threatens both the entire Charleston housing ecosystem and, given research done as part of the study validating its prominence everywhere, the Rental Housing industry as a whole. Like top trial consultants, he is helping the jury see their role as the only authorized body capable of preventing future community and society harm.

## 2. Organizational Systems Analysts in Complex Torts

In massive corporate malfeasance cases (e.g., Theranos, Boeing, opioid litigation, or environmental disasters), law firms frequently hire organizational sociologists and systems engineers as non-witness consultants.

- **The Precedent:** Their job is to look at a mountain of seemingly disconnected emails, shell companies, and bureaucratic delays, and map the "decision architecture" that proves *willful blindness* or *institutional betrayal*. They find the structural root cause of the bad behavior.
- **The Overlap:** McNeil's application of John Seddon's Vanguard Method and the Systems Thinking tool "Iceberg Model" (moving from Events to Mental

Models) is textbook organizational consulting. He mapped the Altman/Meridian enterprise not just as bad actors, but as a system operating under the "Status > Truth" paradigm. He identified the "gatekeepers" and the structural opacity (LLCs) that allow the harm to continue.

### 3. Strategic Litigation Communications (Litigation PR)

Litigation does not happen in a vacuum, especially when it involves public figures, public policy (like the Homeownership Initiative Commission), and systemic community crises.

- **The Precedent:** Elite litigation PR consultants are hired to manage the "Court of Public Opinion" parallel to the court of law. Their job is to identify the opponent's "False Frames" (e.g., "This is just a routine deposit dispute") and dismantle them in the press, reframing the plaintiff as a whistleblower acting in the public interest.
- **The Overlap:** The "Whistleblower Revelations Report," that serves as Exhibit B here, open letters to the Mayor and Altmans, and his identification of local media capture are classic strategic communications maneuvers. He is ensuring that if the legal system attempts to quietly crush him, the public and national media will recognize the exact systemic mechanics of *how* and *why* it is happening.

### 3. Most Vulnerable Member Methodology (Undercover Boss, Honor Your Oath)

The precedent exists for all these roles, but what makes McNeil's posture highly unusual (and potentially very potent) in this context is the **MVM (Most Vulnerable Member) embedded testing**.

Consultants usually study the system without directly assessing its response to a pull from a system member it serves, perhaps by looking at documents after the fact. McNeil intentionally used his forced displacement and opportunity to take the *pro se* status to conduct a live, real-time stress test of the system. He gathered data on the local court's 33:1 processing disparity and the defense's gaslighting tactics by actually absorbing the systemic friction himself.

Yet there is still precedent for the MVM role in other contexts, including the TV show **Uncover Boss** and First Amendment Auditor Jeff Grey of Honor Your Oath, who dresses as if he is homeless, holding a cardboard sign reading "God Bless the Homeless Vets" and records interactions with law enforcement to see if they respect his rights.

# **EXHIBIT B**

## **Whistleblower Revelations Report**

# Whistleblower Revelations Report: False Narrative System Collapse, and Public-Interest Implications in McNeil & Poyer v. SAC 181 et al.

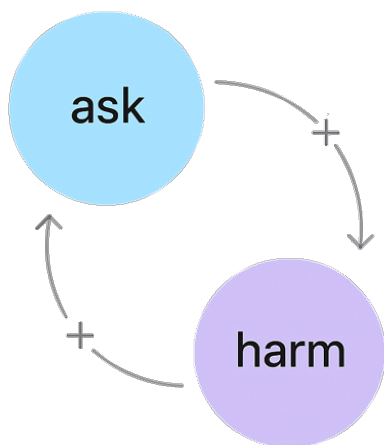
This report is designed to function as both an exhibit for ongoing litigation and as a concise talking paper for national press. The record now shows overlapping false frames reinforced across private actors, regulatory channels, court process, political structures, and local media incentives.

The report starts from documented events described across the Housing Justice Audit (HousingJusticeAudit.com) , the RocketsFight.org record, the March 20 Enforcement Matrix, and the SC Supreme Court's return-request posture, then maps these events to collapse patterns in other false-narrative systems.

## Core finding

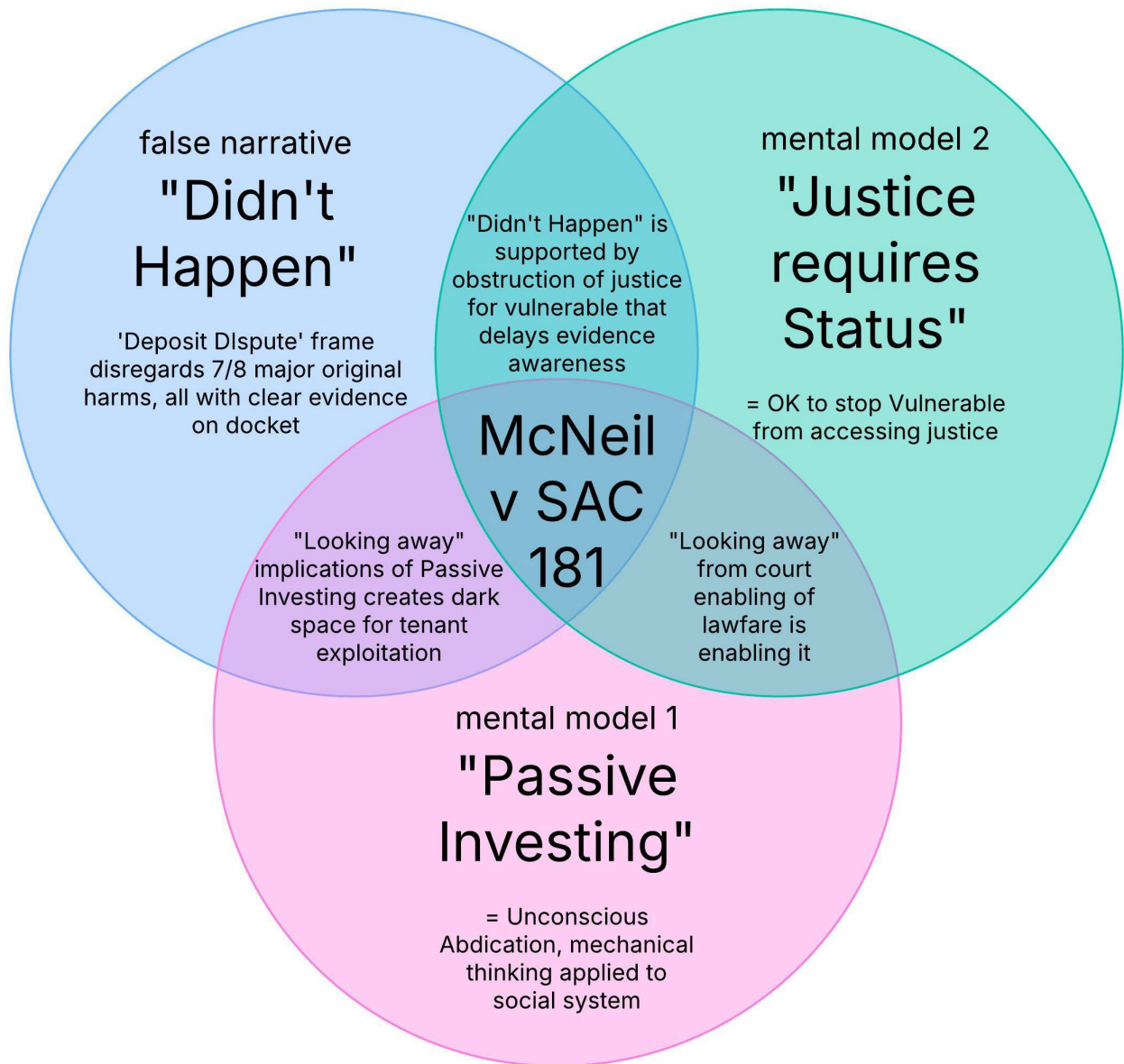
The Charleston record supports a systems-level conclusion: when a vulnerable party challenged the underlying conduct at 181 Gordon Street, the response pattern expanded through “false narrative capture” of multiple reinforcing institutions

### The Ask-Harm Loop



The Housing Justice Audit describes this as the Ask-Harm Loop in which the system responds to the ask for fairness or justice with escalating harm; escalating until the SC Supreme Court took the rare action of a Return Request demanding the Charleston SC Court of Common Pleas explain itself.

# The Intersection of 3 Mutually-Supporting Harm-Creating Models in McNeil v SAC 181, LLC et al



# One Primary False Narrative, Two Supporting Dysfunctional Mental Models.

The “**Didn’t Happen**” frame that is the stance of defense is the gaslighting position that 7/8 original major harms in the case never happened, with none of them ever being acknowledged by defense, let alone addressed directly with evidence engagement. Coordinated communication under this frame, combined with ongoing harassment and exhaustion tactics, created the late January nervous breakdown and concurrent 76/80 PCL-5 “extreme” PTSD score of Plaintiff McNeil. It is noteworthy that McNeil re-took the PCL-5 on May 6, 2026 and scored 72/80 for the preceding month, still in the “extreme” category due in part to the stress of navigating this high-stress situation of whistleblowing on a power structure that includes local government, a multi-billion dollar development project, the local court, law enforcement agencies, and the dominant Newspaper of the area, all of which are operating under at least one of these three harm-creating models.

Then there are 2 dysfunctional mental models:

- (1) “**Passive Investing**” which really means “unconscious abdication which is behind the rental property investment and management mindset that funded and enabled all the harm through creating a dark space for bad actors to thrive in, supported by enabler money. The harm enabled by “funding while looking away” has also enabled harm to the funding enablers by allowing escalating exposure as SAC 181 LLC’s counsel prioritized Tara Bayles’ PMIC license – which was and may still be under investigation by the LLR – above protecting the Altman portfolio. This is the mental model addressed in the **Housing Justice Audit Report of the Charleston, SC Housing Justice System** (currently published in beta form at [housingjusticeaudit.com/report](https://housingjusticeaudit.com/report)), which is contrasted with the goal “solution paradigm” of *Conscious Co-Stewardship*, which unifies the roles of tenant, manager, and owner with shared values and beliefs based on *reverence for the shelter life stories play out in*.
- (2) “**Justice Requires Status**” is the operating model of the Charleston SC Court of Common Pleas as experienced by Plaintiffs, with the notable exception of Judge Van Slambrook, given his fair handling of the February 9, 2026 scheduling hearing and April 2 order.

The following table identifies these 3 primary harmful models operating in the Charleston matter, the system members carrying them, their practical function, and the harm they produce.

| Type and Model                                                  | System member / role                                                                          | Structural function                                                                                                                                                                                   | How it contributes to harm                                                                                                                                             |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>False Narrative:</b><br>"(These things) didn't happen"       | Property manager, defense counsel, carrier representatives, passive court treatment of record | Avoid LLR investigation scrutiny of evidence; Triggers reliving documented traumatic events by pretending they never happened.                                                                        | Forces repetitive re-proving of already documented harms such as retaliatory eviction, privacy syndication, postal falsification, and gaslighting injury.              |
| <b>Mental Model:</b><br>"Passive investing" as neutral distance | Beneficial owners, portfolio owners, legacy insiders                                          | Attempt to protect conscience: Creates moral and informational distance between owner capital and frontline conduct.                                                                                  | Shields principals from tenant reality while allowing delegated actors to conduct eviction, privacy invasion, and litigation aggression in a low-feedback environment. |
| <b>Mental Model:</b><br>"Justice requires Status"               | Defense counsel, court process, administrative delay, enforcement bottlenecks                 | Obstruct justice for unrepresented parties with a litigation strategy that also favors maximizing billed hours. Converts time into pressure and procedural silence into open space for further abuse. | Makes rights assertion expensive, slow, and destabilizing for pro se litigants, including through delayed rulings, continuances, and unaddressed ADA issues.           |

## Three branches plus the press

A defining feature of this matter is that the capture pattern is not limited to private defendants. The documentary record describes interactions touching the executive or administrative branch, the judicial branch, the political-legislative layer of housing governance, and the narrative-setting role of the local press.

| Institutional lane         | Relevant actors identified in record                                                                             | Relationship to false-frame                                                                                           | Public-interest significance                                                                                            |
|----------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| Executive / administrative | LLR, sheriff complaint channel, insurance and regulatory pathways                                                | Delayed, obstructed, or friction-heavy channels preserve status quo when intervention needed                          | Shows whether formal enforcement protects the vulnerable or merely absorbs complaints without restoring function.       |
| Judicial                   | Ninth Circuit Common Pleas motion practice, continuances, ADA non-action, later SCSC intervention                | Silence and selective motion movement can create substantive disadvantage for pro se parties.                         | Matters because judicial inaction can become the force multiplier for every upstream abuse.                             |
| Legislative / policy       | Affordable housing commission role and Project 3500 conflict notifications                                       | Public housing-policy rhetoric can coexist with private extraction incentives when conflict review is weak or absent. | Raises city-wide integrity concerns because actors advising on affordability are beneficiaries of displacement model.   |
| Fourth estate / press      | Post and Courier ecosystem and development-linked media incentives as described in the HJA open-letter materials | Coverage scarcity preserves elite plausibility and delays external scrutiny.                                          | National press significance arises when local news structures are too entangled to serve as a corrective feedback loop. |

## **Structural explanation**

The relationship pattern can be understood as a flow issue. Capital, status, legal representation, and reputational insulation flow downward with relative ease, while tenant harm data, truth claims, and corrective signals encounter friction at each higher layer; the result is a one-way system in which authority can act on the vulnerable faster than the vulnerable can obtain remedy from authority.

The Open Letter to the Altmans describes that structure in practical terms: owner money flows down through managers, lawyers, and insurers, while tenant well-being feedback fails to flow back up. The mandamus materials then show what happens when the judicial node that should rebalance the system instead goes silent long enough that the Supreme Court must demand a return on the status of pending motions.

That architecture explains why a whistleblower or truth-telling plaintiff often appears, from outside the case, to be in conflict with many different entities at once. The conflict is not random. When the same false frame protects multiple actors simultaneously, those actors share an incentive to keep the frame alive even if each one only controls a small part of the machine.

## **Historical parallels**

Systemic structures are fractal. So while the Charleston matter is not identical to Theranos, Boeing, Enron, or Lance Armstrong, the value of those comparisons lies in the recurring collapse mechanics:

- an internal or public narrative diverges from evidence,
- dissenters are marginalized or pathologized,
- institutions with reputational or financial incentives hesitate to correct course, and
- the burden of truth falls first on the person closest to the contradiction.

| Historical example      | Dominant false frame                                                                                     | How dissenters were treated                                                                              | Collapse trigger                                                                       | Relevance here                                                                                                                                      |
|-------------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Theranos                | Revolutionary health technology narrative masked non-functioning core claims                             | Employees and critics were pressured, isolated, or discredited while elite validators buffered scrutiny. | Evidence, regulatory scrutiny, and press reporting finally outran prestige protection. | Demonstrates how status-rich ecosystems suppress contradiction until proof becomes too dense to ignore.                                             |
| Boeing (737 MAX era)    | Safety culture and engineering excellence narrative masked incentive distortions and warning suppression | Internal safety concerns struggled against production, hierarchy, and organizational self-protection.    | Catastrophic events plus investigation shattered the prior story.                      | Shows how institutions may preserve performance narratives after warning signals become visible to insiders.                                        |
| Enron / Arthur Andersen | Sophisticated innovation and market genius masked accounting unreality                                   | Questioners faced a prestige wall created by complexity and insider confidence.                          | Financial reality forced reconciliation; gatekeepers were implicated too.              | Illustrates how the collapse of a false frame can implicate not only primary actors but validators, advisors, and supposedly independent overseers. |
| Lance Armstrong         | Invincibility and righteousness narrative resisted evidence for years                                    | Critics and whistleblowers were aggressively attacked and portrayed as                                   | Accumulated testimony and proof dissolved the myth.                                    | Useful for understanding narrative inversion: the truth-teller is framed as the offender until                                                      |

| Historical example               | Dominant false frame                                                                                                                                                                                  | How dissenters were treated                                                                                                                                                   | Collapse trigger                                                                                                                                                       | Relevance here                                                                                                                            |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
|                                  |                                                                                                                                                                                                       | dishonest or disloyal.                                                                                                                                                        |                                                                                                                                                                        | the evidence stock crosses a threshold.                                                                                                   |
| McNeil & Poyer v. SAC 181 et al. | Minor "deposit dispute" or unreasonable-tenant narrative masked a wider pattern of retaliatory eviction, privacy abuse, postal-fraud allegations, coordinated gaslighting, and procedural suppression | The record describes reframing of documented boundary-setting and evidence-driven escalation as the problem itself, alongside severe PTSD-level harm and institutional delay. | Supreme Court return request, public evidence consolidation, and convergence of multiple documentary strands are forcing the local story to reconcile with the record. | The case functions as a live example of false-frame collapse in a housing-justice setting with local political, legal, and media overlap. |

### What happens to whistleblowers in these systems

- initial minimization,
- character reframing,
- institutional delay,
- selective process enforcement, and then
- scapegoat pressure when the original story can no longer hold together.

That pattern is visible in the Enforcement Matrix's DARVO framing, and the mandamus record's depiction of prolonged silence on pro se motions while defense motions moved quickly. **The practical consequence is injury multiplication.**

Instead of the system confining the original harm, each layer adds workload, uncertainty, cost, and physiological stress to the truth-teller, turning the act of reporting into a secondary trauma channel. The HJA places that dynamic at the center of the case, connecting the Ask-Harm Loop to a documented PCL-5 score of 76/80 and describing the system's response as escalating harm in response to escalated asking.

## Why the press should care

For national press, the importance of this matter is not limited to the fate of one Charleston case. The record presents a compact test of a national question: what happens when housing extraction, elite local networks, procedural inequality for pro se litigants, regulatory friction, and media conflict all operate in the same city around the same live dispute.

The case is also unusually legible. The record already contains an evidence matrix, public explanatory materials, a systems framework, an extraordinary Supreme Court return request, and a whistleblower narrative that names the false frames instead of merely describing isolated incidents. That makes the matter useful not only as news but as a model for understanding how captured local systems preserve themselves until outside attention forces a reconciliation with the record.

## Indicators national press can examine quickly

| Indicator                                  | Why it matters                                                                                                                              | Record basis                                        |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| 33:1 motion-processing disparity           | Suggests a structural access-to-justice problem rather than ordinary disagreement over rulings                                              | Mandamus materials and SCSC return-request context. |
| 166-day delay on leave to amend            | Illustrates how silence can function as substantive protection for connected parties                                                        | SCSC-facing materials and hearing-prep analysis.    |
| 76/80 PCL-5 and 79/80 gaslighting severity | Shows the measurable human cost of prolonged narrative erasure and coordinated pressure                                                     | January 26 notice and HJA record.                   |
| Housing commission conflict allegations    | Connects the case to public integrity and city policy rather than private landlord friction alone                                           | Open letter to Mayor Cogswell and mandamus summary. |
| Media-conflict allegations                 | Tests whether local press can function as a corrective feedback loop where development ties are dense                                       | HJA political and media-betrayal framing.           |
| Enforcement-matrix breadth                 | Makes it possible to compare narrative framing against a multi-lane allegation set that includes criminal, civil, and regulatory dimensions | March 20 matrix.                                    |

## **Structural model for judges, writers, and investigators**

Judges, reporters, and outside investigators can use the same simple model to orient the case:

**First, identify the visible events:** retaliatory displacement, image syndication, alleged postmark falsification, gaslighting, and prolonged docket silence.

**Second, identify the patterns:** repeated minimization, role inversion, delay, insulation of connected actors, and rising pressure on the party closest to the evidence.

**Third, identify the structures:** delegated ownership, insured defense, fragmented enforcement, pro se filing disadvantages, and media-development overlap.

**Fourth, identify the mental model underneath:** a mechanical, zero-sum view of housing in which the vulnerable party is treated as an input to be managed rather than a human participant in a social system.

That model helps distinguish ordinary conflict from system capture. In an ordinary dispute, evidence tends to narrow disagreement over time. In a captured system, evidence often widens retaliation because too many connected actors have become invested in the old story.

## **Why this report exists now**

This report exists because the Charleston matter appears to be crossing the threshold where the old narrative can no longer absorb the documentary record without visible strain. The Supreme Court's return-request posture, the public documentation of institutional-betrayal layers, the conflict allegations around affordable-housing governance, and the explicit whistleblower framing together indicate that the question has shifted from "did one tenant dispute become messy" to "what does a captured local system look like when the evidence stock becomes too large to suppress quietly".

For litigation purposes, that threshold matters because safety, access, and case-management decisions now carry effects beyond routine docket management. For public-interest purposes, it matters because the case offers a rare, well-documented view of how overlapping false frames can align private wealth, legal process, civic reputation, and press silence against a vulnerable truth-teller until supervisory or national attention breaks the loop.



## **The CRE Development / Law / Politics / Tenant-Exploitation Cluster**

Project 3500 infographic documented relationships, sourced to public records and prior filings:

- **Jonathan S. Altman**
  - Mayor Cogswell's Homeownership Initiative Commission member;
  - financial beneficiary of SAC 181, LLC (the named defendant);
  - RA of 1801 Reynolds, LLC (active North Charleston commercial holding);
  - proposed 3AC defendant;
  - recipient of the documented Open Letter and Countdown notice (February 2026) declined by silence;
  - Signing PR on Samuel H. Altman's 2020 estate inventory containing the 95.4% per-share CRC devaluation and the Schedule F valuation cluster.
  
- **Charles S. Altman**
  - RA of SAC 181, LLC;
  - Will be individual defendant upon granting of “freely given when justice so requires” 199 day old Second Amended Complaint on negligent agent retention allegations;
  - Attorney at Law Office of Charles S Altman (575 King Street, Suite A);
  - 39 Wappoo Creek Place mortgage paid off January 12, 2026 - 17 months early;
  - Signer of \$5 “Flash Transfer” of 181 Gordon Street into SAC 181, LLC same day as inheritance.
  
- **Mayor William Cogswell**
  - Project 3500 affordable housing initiative;
  - receives advisory input from Jonathan S. Altman;
  - notification email an exhibit of May 27, 2026 Plaintiff's Supplemental Notice;
  - subject of Plaintiffs' April 4, 2026 Open Letter at [housingjusticeaudit.com/open-letter-mayor-cogswell](https://housingjusticeaudit.com/open-letter-mayor-cogswell);
  - not yet the subject of any disclaimer of the Altman advisory relationship despite documented conflict.
  
- **The Peninsula project (upper King Street)**

- partnership including Evening Post Industries;
- sales office located at 573 King Street – The Altman Building, owned by Charles Realty Company, Inc. an Altman-controlled entity since 1939;
- **Evening Post Industries / The Post and Courier**
  - parent company / local newspaper;
  - structural conflict with respect to coverage of the case, the Mayor's office, the Peninsula project, and the Altman-family real-estate footprint, consistent with the Google AI characterization of the case as a "high-profile housing rights lawsuit" against a documented absence of local media coverage.
- **Phelps Dunbar / Resnick Louis / IPG Insurance**
  - defense-and-carrier cluster; documented Rule 4.3 violations;
  - documented coordinated false-frame maintenance.
- **Charleston County Common Pleas administrative environment**
  - No ADA Accommodations, Motion requested them on January 30, 2026 – non-optional;
  - documented selective-action pattern (5 days for defense housekeeping motion vs. 166-189 days for pro se motions),
  - now subject to SCSC supervisory review in 2026-000919.

# AI Answer Buttons from Open Letter

to Mayor Cogswell at

[housingjusticeaudit.com/open-letter-mayor-cogswell](https://housingjusticeaudit.com/open-letter-mayor-cogswell)

Ask Google AI about the media connection.

Ask Google AI about the conflict of interest.

**See following pages for results.**

# Result on May 8, 2026: “Ask Google AI about the media connection”

AI Mode ▾ All Images Videos News More ▾

Who owns Peninsula of Charleston senior living community and how are they connected to local media?

The Peninsula of Charleston senior living community is co-owned and developed by Liberty Senior Living and Evening Post Industries (EPI). 🔗 The Peninsula of Charleston +1

## Ownership Details

- [Liberty Senior Living](#): A family-owned company based in Wilmington, NC, with nearly 150 years of experience in healthcare and residential services.
- **Evening Post Industries (EPI)**: A Charleston-based company that operates under its parent firm, [Courier Square, LLC](#). 🔗

## Connection to Local Media

The primary connection to local media is through **Evening Post Industries**, which has a long history as a major media conglomerate in the region.

- **Former Newspaper Ownership**: Until recently, EPI was the parent company of **The Post and Courier**, Charleston's primary daily newspaper. While the company has shifted its focus heavily toward real estate development, it retains deep historical and corporate ties to the local media landscape.
- **Project Location**: The community is part of the **Courier Square District** development, situated on land formerly occupied or adjacent to the media operations of the Post and Courier.
- **Multimedia Legacy**: EPI's origins date back to 1894 with the formation of the *Evening Post*, eventually growing into a thriving multimedia and real estate firm.

The Peninsula of Charleston +4

💡 **Key Fact:** The Peninsula of Charleston uses a rare **equity model**, meaning residents actually own their units as a real estate investment rather than just paying rent or entrance fees.

Senior Housing News +1

If you tell me which specific aspect of the ownership you are most interested in, I can provide more details:

- **Project timeline or estimated opening date** (currently slated for 2027/2028).
- **Pricing tiers** for the different unit sizes (currently ranging from ~\$775k to over \$4M).
- **Healthcare services** provided on-site through their partnership with MUSC.

AI can make mistakes, so double-check responses




Ask anything



# Result on May 8, 2026: “Ask Google AI about the conflict of interest”

AI Mode ▾ All Images Videos News More ▾

How is Jonathan S Altman conflicted in his role of affordable housing commissioner in Charleston?

Jonathan S. Altman is reportedly conflicted in his role on the **City of Charleston's Homeownership Initiative Commission** due to a disconnect between his public role as an affordable housing advocate and his private business practices as a real estate investor and attorney. 

## Primary Conflicts of Interest

Recent legal filings and public reports highlight several key areas where Altman's private interests appear to clash with his public duties:

- **Ownership and Litigation:** Altman is a beneficial owner of **SAC 181, LLC**, which owns a rental property at 181 Gordon Street. This property is currently at the center of a high-profile [tenant exploitation and retaliatory eviction lawsuit](#) (*McNeil v. SAC 181 LLC*).
- **Asset Undervaluation:** Sworn probate documents from 2021 reveal that Altman significantly understated the value of real estate assets. For example, he reported a property value of ~\$251,000 despite market estimates (Redfin) being closer to **\$620,000** at the time.
- **Corporate Devaluation:** The Altman Files highlight a 95% valuation collapse in family-owned **Charles Realty Company, Inc.** stock—from \$30,000 to ~\$1,392 per share—during a major real estate boom in Charleston.


- **Operational Commingling:** Evidence suggests operational overlap between Altman-owned entities and property management firms like Meridian Residential Group, raising questions about the "piercing of the corporate veil" to protect private assets from liability.

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## Impact on Public Trust

Critics, including plaintiffs from [Rocket's Fight](#), argue these actions undermine the credibility of Charleston's housing initiatives:

- **Policy Contradiction:** While the Commission aims to create homeownership opportunities for low-income families, Altman's private entities are accused of practices that drive displacement.
- **Tax Evasion Allegations:** The systematic devaluation of inherited assets is viewed as a "Flash Transfer" scheme to minimize tax burdens while maintaining extraction-based investment models.
- **Political Pressure:** An Open Letter to the Altmans and communications to Mayor William Cogswell have called for Altman's removal to protect the integrity of the city's \$18 million "Project 3500" affordable housing plan.

 **Key Takeaway:** The conflict centers on Altman's dual identity as a "potential agent of change" on a housing committee and a "conflicted investor" whose private family enterprise allegedly prioritizes asset extraction over community stewardship.

To better understand the current status of these allegations, would you like to see the specific **court case numbers** or the details of the "**Housing Justice Audit**" released earlier this year?

AI can make mistakes, so double-check responses



Ask anything



# **EXHIBIT C**

**Current Versus Recommended Roster Table for May 28,  
2026 Hearing**

## Current Versus Recommended Roster Table for May 28, 2026 Hearing

*Case No. 2025-CP-10-05095 — McNeil & Poyer v. SAC 181, LLC et al — Hon. Will Wheeler*

This exhibit is offered as a case-management aid for the Court's pre-hearing review. It identifies (a) matters suitable for papers-only disposition before May 28; (b) the gateway Rule 36 sufficiency motion whose pre-hearing resolution would collapse much of the live roster; (c) the operative-pleading sequence; and (d) the recommended grouping and ordering for matters that remain for live argument. Filing dates are included for each item to enable rapid docket cross-reference. Items #1–#26 are presently on the May 28, 2026 Wheeler roster as published. Items S-1 through S-4 are case-management matters not on the published roster but ripe and necessary for the Court's pre-hearing or hearing-day attention.

### Legend:

|                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------|
| <i>Green-shaded item numbers (#2, #4, #8, #10, #17, #19, S-1, S-3) = priority candidates for pre-hearing disposition.</i> |
| <i>Yellow-shaded rows (S-1 through S-4) = case-management matters not on the published roster but ripe and necessary.</i> |

| # | Filed      | Matter                                                       | Filing Party         | Recommended Pre-Hearing Act                                                           | Effect of Pre-Hearing Act                                                                                           | Recommended Treatment Within Hearing              | Reason / Predictable Defense Point Answered                                                                                                             |
|---|------------|--------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 04/22/2026 | Motion/Compel Compliance W/Subpoena Duces Tecum (Synovus)    | Plaintiffs           | None; preserve for live argument                                                      | Targets evidence suppression directly relevant to veil-piercing and judgment collectibility                         | Hear in Plaintiff compel-motion group (Segment 4) | Synovus records bear on the \$5 Flash Transfer, security-deposit accounts, and inter-entity flows central to veil-piercing.                             |
| 2 | 09/24/2025 | Emergency Motion/Redaction of Personal Identifiers           | Plaintiffs           | GRANT on the papers before hearing                                                    | Removes from live roster; ministerial privacy protection                                                            | Remove                                            | Ministerial; no party prejudice; oldest unrulled Plaintiff motion (227 days).                                                                           |
| 3 | 10/29/2025 | Emergency Motion/Rule 11 Sanctions & Strike Defective Answer | Plaintiffs           | None; defer until threshold rulings                                                   | Sanctions framing narrows once 2AC leave and Rule 36 are decided                                                    | Move to end (Segment 6)                           | Sanctions disputes depend on ambiguity that earlier rulings reduce; unclean-hands weighs against letting sanctions drive sequence.                      |
| 4 | 10/30/2025 | Motion/Leave to File 2nd Amend Cmplnt & Response/Opposition  | Plaintiffs / SAC 181 | GRANT on the papers; STRIKE 04/21/2026 untimely opposition; shorten answer to 10 days | Establishes operative pleading and answer posture; adds Charles S. Altman individually and image-syndication counts | If not pre-ruled, hear FIRST in Segment 2         | 199+ days pending; SCRCP 15(a) directs leave 'freely given'; defense engaged no merits in 04/21/26 opposition filed only after the SCSC return-request. |
| 5 | 11/10/2025 | Motion/Compel Discovery Responses & Sanctions                | Plaintiffs           | None                                                                                  | Scope narrows after Rule 36 and pleading rulings                                                                    | Hear after RFA sufficiency (Segment 4)            | Discovery scope is best assessed once admitted facts and operative pleading are clarified.                                                              |
| 6 | 11/20/2025 | Motion/Protective Conditions & Response to Defense Request   | Plaintiffs           | Clarify hearing-environment conditions in pre-hearing order                           | Narrows live argument to any unresolved point                                                                       | Brief check at outset (Segment 1)                 | Safety conditions govern the hearing itself and should not be deferred behind merits disputes.                                                          |
| 7 | 11/26/2025 | Response & Cross Motion/Sanctions in Opp to Motion/Sanctions | Plaintiffs           | None                                                                                  | Heard with related sanctions motions                                                                                | Group with #3, #13 in Segment 6                   | Mirror-image sanctions postures should be heard together once threshold issues resolve.                                                                 |

| #  | Filed      | Matter                                                                    | Filing Party               | Recommended Pre-Hearing Act                                                                                                   | Effect of Pre-Hearing Act                                                                                                                | Recommended Treatment Within Hearing                                           | Reason / Predictable Defense Point Answered                                                                                                                                    |
|----|------------|---------------------------------------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8  | 12/23/2025 | Motion to Determine Sufficiency of Answers to RFAs (Rule 36 Gateway)      | Plaintiffs                 | QUEUE for pre-hearing review on the papers; if record sufficient, ENTER deemed admissions under SCRCP 36(a)(6) before hearing | Most powerful docket-collapse tool: deemed admissions on mass image distribution and other facts moot or narrow numerous defense motions | If not pre-ruled, hear SECOND (Segment 3)                                      | Defense answers were evasive/non-substantive; deemed admissions establish facts underlying the 2AC counts regardless of the leave ruling, simplifying every subsequent motion. |
| 9  | 01/28/2026 | Emergency Motion/Protective Relief                                        | Plaintiffs                 | Address concurrently with Section V TRO request                                                                               | Aligns hearing-environment safety with asset-preservation safety                                                                         | Brief check at outset (Segment 1)                                              | Documented PCL-5 76/80 and post-notice volatility require pre-hearing safety clarity.                                                                                          |
| 10 | 01/30/2026 | Supplemental Motion/ADA Accommodations                                    | Plaintiffs                 | GRANT on the papers before hearing                                                                                            | Converts full argument into implementation only                                                                                          | Brief confirmation only (Segment 1)                                            | 98+ days pending; documented disability and reasonableness on record; 14th Amend / Title II access concerns.                                                                   |
| 11 | 10/29/2025 | Partial Motion/Dismiss Amended Complaint                                  | SAC 181                    | None beyond clarifying operative pleading                                                                                     | Stale or narrowed once 2AC leave is granted                                                                                              | Move to Segment 6; hear only as to claims still directed to operative pleading | Defendants should not profit from a superseded pleading posture after prolonged delay.                                                                                         |
| 12 | 11/07/2025 | Motion/Protective Order/Stay of Discovery/Crt Srv                         | SAC 181                    | None                                                                                                                          | Weakens after threshold rulings, Rule 36, and unclean-hands findings                                                                     | Group with defense stay/protective motions in Segment 6                        | Stay/protective requests are derivative; must not outrank unresolved access, pleading, and Rule 36 matters.                                                                    |
| 13 | 11/19/2025 | Motion/Sanctions/Crt Srv                                                  | SAC 181                    | None                                                                                                                          | Narrows after pleading, Rule 36, and discovery rulings                                                                                   | Group with #3, #7 in Segment 6                                                 | Defense sanctions framing depends on preserving ambiguity earlier rulings reduce.                                                                                              |
| 14 | 01/12/2026 | Motion/Quash Subpoena & Incorp Memo of Law/Crt Srv                        | SAC 181                    | None                                                                                                                          | Many arguments weaken after pleading, admissions, compel rulings                                                                         | Group with quash motions in Segment 6                                          | Front-loading quash preserves obstruction advantages; group later prevents that.                                                                                               |
| 15 | 01/26/2026 | Motion/Protective Order in re: Deposition of SAC 181                      | SAC 181                    | None                                                                                                                          | Weakens after threshold rulings                                                                                                          | Group with defense stay/protective motions in Segment 6                        | Same derivative-motion concern as #12.                                                                                                                                         |
| 16 | 01/27/2026 | Motion/Quash Subpoena & Memo of Law/Crt Srv                               | SAC 181                    | None                                                                                                                          | Same as #14                                                                                                                              | Group with quash motions in Segment 6                                          | Same derivative-motion concern as #14.                                                                                                                                         |
| 17 | 03/20/2026 | Motion to file Exhibits A-1, A-2, A-3 under seal (Brief in Aid of Safety) | Plaintiffs                 | GRANT on the papers before hearing                                                                                            | Removes from live roster; ministerial sealing of jury-verdict-exposure modeling                                                          | Remove                                                                         | Discrete sealing request compatible with efficient docket control; protects sensitive risk modeling.                                                                           |
| 18 | 10/24/2025 | Motion/Leave to Amend Second Amended Complaint                            | Plaintiffs                 | Treat as identical to Item #4 (single motion duplicated on roster)                                                            | Resolved by ruling on #4                                                                                                                 | Resolved by Segment 2 ruling on #4                                             | Roster appears to list this motion twice; one ruling resolves both.                                                                                                            |
| 19 | 09/30/2025 | Motion/Compel Insurance Disclosure & F/Sanctions                          | Plaintiffs                 | None; preserve for live argument                                                                                              | OLDEST unruled Plaintiff motion (221 days); bears on case management and damages posture                                                 | Hear in Plaintiff compel-motion group (Segment 4)                              | Insurance disclosure essential to realistic case management and to evaluating IPG / Hiscox layered coverage referenced in 04/28/26 SCSC supplement.                            |
| 20 | 01/08/2026 | Motion/Quash/Crt Srv                                                      | Meridian Residential Group | None                                                                                                                          | Many arguments weaken after pleading and compel rulings                                                                                  | Group with quash motions in Segment 6                                          | Derivative; consolidated quash review prevents front-loaded obstruction advantage.                                                                                             |
| 21 | 01/27/2026 | Motion of Joinder for Motion/Stay                                         | Meridian Residential Group | None                                                                                                                          | Falls or narrows with #12                                                                                                                | Group with defense stay motions in Segment 6                                   | Joinder rises and falls with the underlying stay motion.                                                                                                                       |
| 22 | 01/30/2026 | Motion in Joinder/Quash Deposition                                        | Meridian Residential Group | None                                                                                                                          | Falls or narrows with the underlying quash                                                                                               | Group with quash motions in Segment 6                                          | Joinder rises and falls with the underlying quash motion.                                                                                                                      |

| #   | Filed                                                   | Matter                                                                                                                   | Filing Party                                           | Recommended Pre-Hearing Act                                                                                                                                                  | Effect of Pre-Hearing Act                                                                                                                                                                                                                         | Recommended Treatment Within Hearing                   | Reason / Predictable Defense Point Answered                                                                                                                                               |
|-----|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23  | 11/04/2025                                              | Notice of & Motion/Dismiss                                                                                               | MRG Investing Company LLC                              | None beyond clarifying operative pleading                                                                                                                                    | Stale or narrowed once 2AC leave is granted                                                                                                                                                                                                       | Move to Segment 6 with #11                             | Same pleading-posture dependency and unclean-hands concern as #11.                                                                                                                        |
| 24  | 04/29/2026                                              | Motion to Cancel Lis Pendens                                                                                             | SAC 181                                                | None                                                                                                                                                                         | Substantially MOOT once 2AC leave is granted; veil-piercing, fraudulent-conveyance, and constructive-trust claims independently support the Lis Pendens. Comprehensive Enforcement Matrix (Ex. C, 03/20/26 Brief) further supports independently. | Move to end of Segment 6 or reserve                    | Premature while operative pleading and asset-linked discovery remain in flux; SAC 181 itself is a captured-counsel-of-record entity now centrally implicated in the veil-piercing claims. |
| 25  | 01/20/2026                                              | Notice of & Motion/Stay Discovery Deadlines                                                                              | MRG Investing Company LLC                              | None                                                                                                                                                                         | Falls or narrows after threshold rulings                                                                                                                                                                                                          | Group with defense stay motions in Segment 6           | Same derivative-motion concern as #12.                                                                                                                                                    |
| 26  | 01/28/2026                                              | Motion/Quash Deposition                                                                                                  | SC Department of Labor, Licensing and Regulation (LLR) | None                                                                                                                                                                         | Plaintiffs' record documents LLR obstruction conduct distinct from ordinary third-party objection                                                                                                                                                 | Hear with quash group in Segment 6, separately briefed | LLR's posture is itself part of the obstruction record and warrants distinct treatment from defense quash motions.                                                                        |
| S-1 | 02/24/2026                                              | Plaintiffs' Case Clarity Brief and Omnibus Request for Relief                                                            | Plaintiffs                                             | QUEUE for pre-hearing review; enter deemed admissions / partial summary judgment on items uncontested in record                                                              | Collapses many derivative motions through deemed admissions and PSJ on un rebutted facts                                                                                                                                                          | Address remaining live elements in Segment 5           | Defense filed no substantive engagement; the Omnibus is the second great docket-collapse instrument alongside the 12/23 RFA Sufficiency motion.                                           |
| S-2 | 05/07/2026                                              | Motion for Recusal of Judge Jennifer B. McCoy from any further role                                                      | Plaintiffs                                             | CONFIRM in pre-hearing order that Hon. Will Wheeler is the sole presiding judicial officer for the May 28, 2026 hearing and any pre-hearing matters flowing from this Notice | Eliminates dual-track administrative confusion that contributed to the SCSC supervisory record                                                                                                                                                    | Confirmation only in Segment 1                         | April 29, 2026 written request to McCoy received no reply; clarity required to prevent renewed gatekeeping conflicts.                                                                     |
| S-3 | Pending entry (proposed in this Notice)                 | TRO / Status Quo Injunction and Court-Ordered Forensic Audit re Altman-Controlled Entity Cluster                         | Plaintiffs                                             | ENTER on the papers if record supports; otherwise hear FIRST in Segment 4                                                                                                    | Preserves judgment collectibility; freezes asset flight (e.g., 01/12/26 early mortgage payoff on 39 Wappoo Creek Place)                                                                                                                           | Segment 4 if not pre-ruled                             | Three-week pre-hearing window is the very window in which asset conversion is most likely; ordinary-course operations expressly preserved.                                                |
| S-4 | 03/20/2026 (already filed; referenced for case framing) | Brief in Aid of Safety Risk Mitigation and Judicial Clarity (with Comprehensive Enforcement / Infractions Matrix, Ex. C) | Plaintiffs                                             | RECOGNIZE as operative case-framing instrument; Ex. C (Infractions Matrix) supports Lis Pendens validity independent of 2AC leave                                            | Provides single-read organizing framework; supports Items #4, #8, #19, #24, S-3                                                                                                                                                                   | Reference as needed across segments                    | Unopposed on the merits; jury-verdict-exposure modeling under seal in Exhibits A1-A3 (see #17).                                                                                           |

## **Short-Form Summary for the Court**

Plaintiffs respectfully request that the Court, before May 28, 2026: (1) GRANT on the papers Items #2, #10, and #17 (redaction, ADA, sealing); (2) GRANT Item #4 and shorten the answer period to 10 days, striking the untimely 04/21/26 opposition; (3) QUEUE Item #8 (Rule 36 sufficiency) for pre-hearing review and enter deemed admissions where the record supports; (4) ENTER the Section V TRO and forensic audit order (S-3); and (5) ENTER a pre-hearing administrative clarification that Judge Wheeler is the sole presiding judicial officer for the May 28 hearing and any pre-hearing matters flowing from this Notice.

Within the May 28 hearing, Plaintiffs respectfully request the following sequence:

Segment 1 - Threshold access and safety (#6, #9);;

Segment 2 - Operative pleading (#4, #18);

Segment 3 -Rule 36 narrowing (#8);

Segment 4 -Asset preservation and Plaintiff compel motions (S-3, #1, #19, #5);

Segment 5 -Omnibus relief (S-1);

Segment 6 - Grouped derivative defense motions (#3, #7, #11, #12, #13, #14, #15, #16, #20, #21, #22, #23, #24, #25, #26);

Segment 7 - Trial-track setting (Rule 16 conference; date-certain Charleston jury trial Fall 2026).

# **EXHIBIT D**

**Charles S. Altman January , 2026 early Mortgage Payoff**

# **EXHIBIT E**

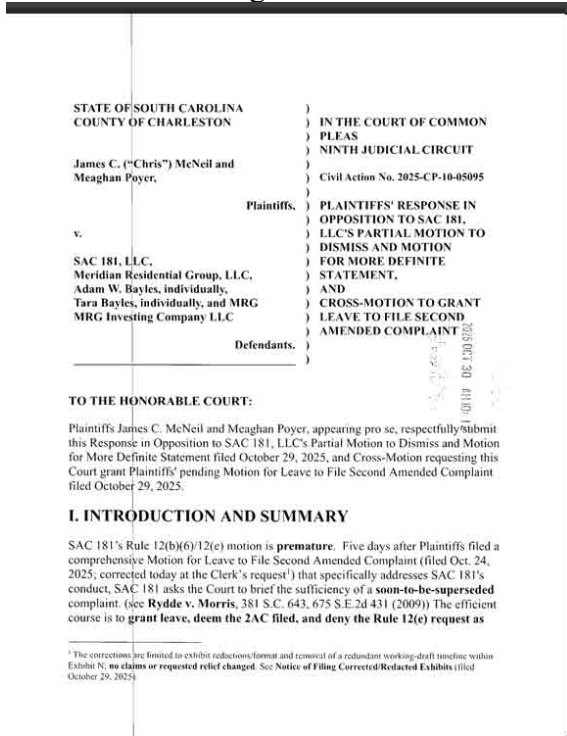
**Structural Obstruction to Justice for Self-Represented  
Parties in Charleston SC Court of Common Pleas**

# Systemic Friction to Justice for Self-Represented Parties in Charleston, SC Court of Common Pleas

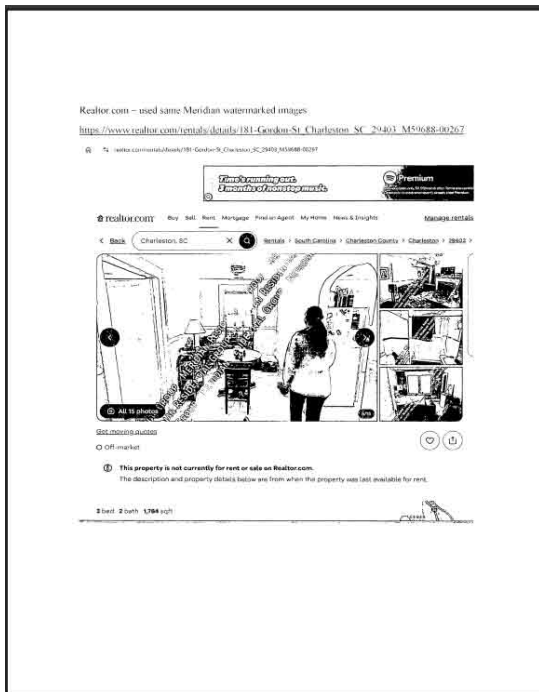
| Step                        | Counsel (e-filing enabled)                                                                                                       | Pro Se (paper filing required)                                                                                                      |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Initial filing              | One click; instant docket entry; preserves color/graphics                                                                        | Drive to downtown Charleston, find parking (\$), walk to Clerk's office, hand-file, scanner produces streaky black-and-white output |
| Service on opposing counsel | Automated via NEF email                                                                                                          | Manual: print, mail or hand-deliver, retain proof                                                                                   |
| Filing proof of service     | Same NEF system; one click                                                                                                       | Separate trip back to Clerk's office; second wait; second filing fee for some categories                                            |
| Visual presentation         | E-filing watermark in vertical blue ("ELECTRONICALLY FILED") on every page; preserves all colors, graphics, embedded screenshots | Streaky black-and-white scan; degraded graphics; visual signal of "lower tier" filing                                               |
| Document tracking           | Real-time docket access; instant confirmation of receipt                                                                         | Days-long lag between hand-filing and docket appearance; no automatic confirmation                                                  |
| Subpoena issuance           | Electronic                                                                                                                       |                                                                                                                                     |



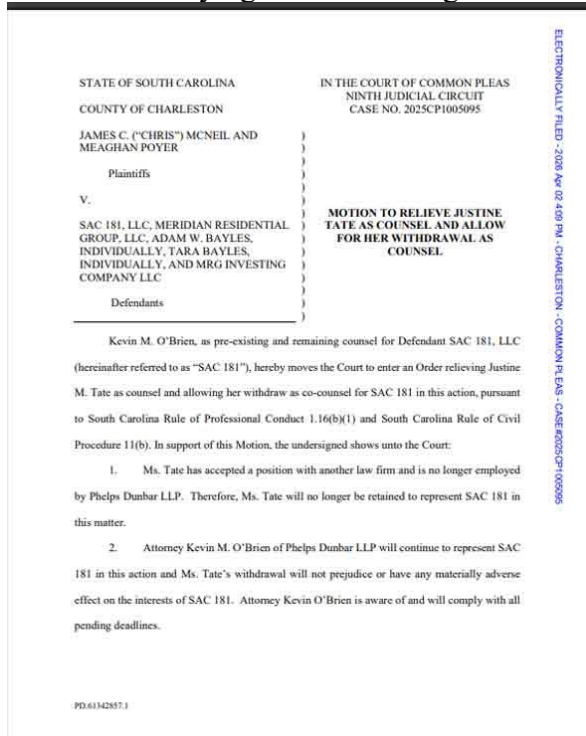
Pro Se scanned in, streaks, no identifying e-filing blue text



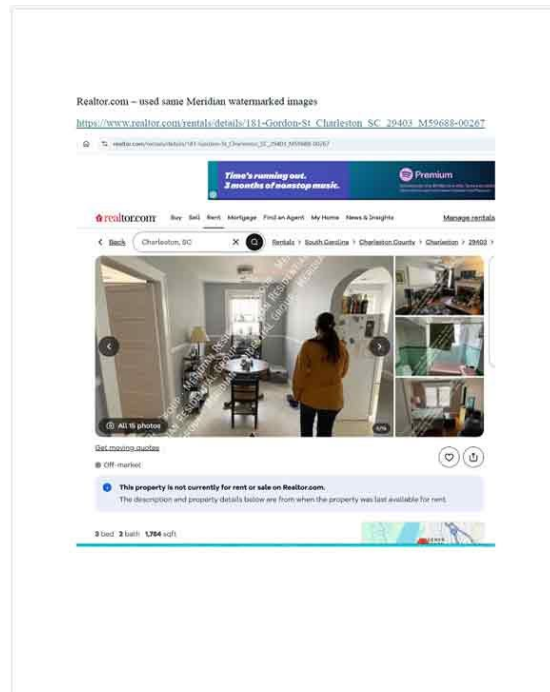
Scan of Pro Se hand-filed graphics from exhibit rendered Black and White, losing resolution



Counsel filing is digitally e-filed, crisp, with identifying blue text on right



Original to demonstrate detail and color lost.



# **EXHIBIT F**

**Pre-Filing Courtesy Copy of Plaintiff's Motion for Recusal  
of the Honorable Jennifer McCoy, to be filed concurrently**

|                                         |   |                                          |
|-----------------------------------------|---|------------------------------------------|
| <b>STATE OF SOUTH CAROLINA</b>          | ) |                                          |
| <b>COUNTY OF CHARLESTON</b>             | ) | <b>IN THE COURT OF COMMON</b>            |
|                                         | ) | <b>PLEAS</b>                             |
|                                         | ) | <b>NINTH JUDICIAL CIRCUIT</b>            |
| <b>James C. (“Chris”) McNeil and</b>    | ) |                                          |
| <b>Meaghan Poyer,</b>                   | ) | <b>Civil Action No. 2025-CP-10-05095</b> |
|                                         | ) |                                          |
| <b>Plaintiffs,</b>                      | ) | <b>PLAINTIFFS’ MOTION</b>                |
|                                         | ) | <b>FOR RECUSAL OF THE</b>                |
| <b>v.</b>                               | ) | <b>HONORABLE</b>                         |
|                                         | ) | <b>JENNIFER B. MCCOY</b>                 |
| <b>SAC 181, LLC,</b>                    | ) |                                          |
| <b>Meridian Residential Group, LLC,</b> | ) |                                          |
| <b>Adam W. Bayles, individually,</b>    | ) |                                          |
| <b>Tara Bayles, individually, and</b>   | ) |                                          |
| <b>MRG Investing Company LLC</b>        | ) |                                          |
|                                         | ) |                                          |
| <b>Defendants.</b>                      | ) |                                          |
| _____                                   | ) |                                          |

Plaintiffs James C. McNeil and Meaghan Poyer respectfully move for the formal recusal of the Honorable Jennifer B. McCoy from all further hearing, administrative, scheduling, or order-signing involvement in this matter.

Pursuant to Canon 3(E) of the South Carolina Code of Judicial Conduct, a judge shall disqualify herself in a proceeding in which her impartiality might reasonably be questioned. This motion rests on documentary evidence showing procedural treatment that differs materially depending on whether proposed orders and motions originate from represented defense counsel or pro se Plaintiffs. The record creates an objective appearance issue under the Canon 3(E) standard, sufficient to warrant recusal regardless of subjective intent.

## **I. PROCEDURAL ASYMMETRY: THE OCTOBER 7, 2025 RETURNED-ORDERS DIRECTIVE AND DIFFERENTIAL TREATMENT OF PROPOSED ORDERS**

On October 7, 2025, the Office of Chief Administrative Judge Jennifer B. McCoy returned Plaintiffs' Motion to Compel Insurance Disclosure and two proposed orders - one for redaction of personal identifiers, one compelling insurance disclosure - with a checked box and handwritten instruction that read:

"motions to be set for hearing. Do not need orders unless judge requests one."

Staff initials: BS.

The return memo established the procedural path Plaintiffs were directed to follow in this case: file motions, wait for hearings, do not submit proposed orders unless the judge requests them. Plaintiffs followed that instruction. The Motion to Compel Insurance Disclosure remained unresolved after the October 7 return, and the growing inventory of pending matters later prompted the South Carolina Supreme Court's April 28, 2026 return-request letter in Appellate Case No. 2026-000919.

In contrast, on April 2, 2026 - six months after the October 7 directive to Plaintiffs - defense counsel Kevin M. O'Brien filed a Motion to Relieve Justine Tate as Counsel. The motion's final sentence states:

"A proposed order for the Court's consideration is submitted herewith."

The proposed order was signed and entered within five business days.

## **The Appearance Issue Under Canon 3(E)**

A reasonable observer reviewing these events in sequence could conclude that the practice governing proposed orders operates differently depending on the party. In at least one documented instance in this case, defense counsel submitted a proposed order with a motion and received a prompt signed order 5 days later. *Pro se* Plaintiffs were explicitly instructed not to submit proposed orders unless requested, and their motions - submitted in compliance with that instruction - remained unscheduled for over six months.

This is a documented procedural asymmetry that a neutral observer might reasonably interpret as differential administrative treatment based on party representation status. Canon 3(E) disqualifies a judge when "her impartiality might reasonably be questioned." The October 7 return, paired with the defense withdrawal order signed in April, meets that standard.

## **Why This Matters for Canon 3(E)**

The October 7 instruction is not inherently problematic. The defense withdrawal order is not inherently problematic. The continuances, viewed in isolation, are within judicial discretion. But the pattern, taken together, creates the reasonable appearance that court administration operates one way for represented defense counsel and another way for *pro se* Plaintiffs, and that Plaintiffs' procedural compliance with the October 7 directive resulted in six months of unscheduled motions while defense motions with attached proposed orders moved through chambers efficiently.

Canon 3(E) does not require proof of actual partiality. It requires only that a reasonable person, aware of all the facts, might question the judge's impartiality. The documentary record establishes that threshold.

## **II. THE DENNIS CLERKSHIP AND THE APPEARANCE OF IMPARTIALITY**

The record identifies an adverse historical intersection between Plaintiff McNeil and the Honorable R. Markley Dennis, Jr., in whose chambers Judge McCoy previously served. This prior experience involved Plaintiff McNeil advocating for victims of a targeted family matter, resulting in admonishment from the bench while the offending party avoided further disposition. The Canon 3(E) standard measures the perception of the reasonable observer. The proximity of Judge McCoy's legal foundation to a chambers with a documented adversarial history with the Plaintiff establishes the baseline condition for recusal.

## **III. THE CONTINUANCE SEQUENCE AND THE AMPLIFICATION OF DOCUMENTED HARM**

The chronological record shows a pattern of administrative delays extending the exact conditions under which Plaintiffs endure documented trauma. The December 1, 2025 Order of Continuance extended the environment where Plaintiff McNeil sustained clinical-severity harm, culminating in a severe PCL-5 PTSD score of 76/80. Subsequently, the March 26, 2026 administrative correspondence displaced the April 3, 2026 hearings. These actions function within a systemic framework that perpetually stalls Plaintiffs' protective relief while preserving the Defendants' operating platform.

#### **IV. ASYMMETRIC ADMINISTRATIVE GATEKEEPING**

The April 29, 2026 communications record documents chambers staff selectively filtering docket access based on party identity. Court administration openly advanced informal, remote-appearance requests from defense counsel while aggressively intercepting Plaintiffs' critical safety filings under misapplied "ex parte" classifications. This asymmetric information-control architecture protects the defense from facing the full scope of their liability exposure while actively blocking the judicial visibility of Plaintiffs' safety risks. A reasonable observer evaluates this administrative disparity as evidence of a compromised tribunal environment.

#### **V. EXPIRATION OF THE VOLUNTARY RECUSAL WINDOW**

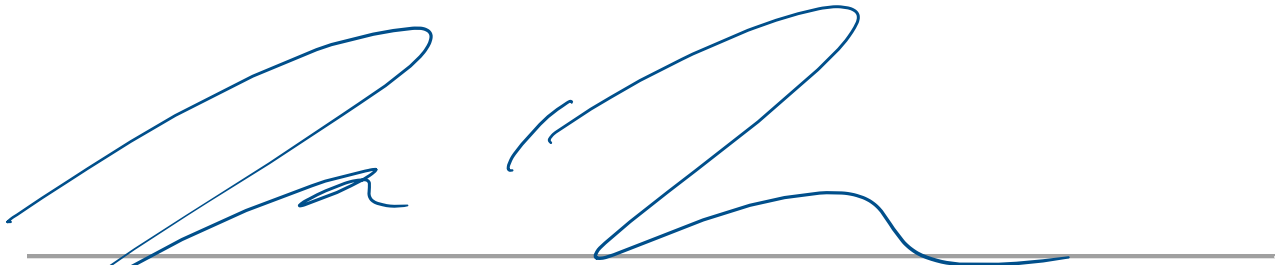
On April 29, 2026, Plaintiffs delivered a formal letter to Judge McCoy offering the professional courtesy of voluntary withdrawal, requesting confirmation of her exit from the case by May 1, 2026. The expiration of this deadline establishes the necessity for this formal motion.

#### **VI. CONCLUSION**

The intersection of local political gravity, Altman family asset exposure, and asymmetric court administration requires decisive state-level intervention. Plaintiffs submit this motion to complete the local record, establishing that the Ninth Circuit environment currently lacks the structural neutrality required to adjudicate this dispute.

Plaintiffs request the immediate entry of an Order of Recusal, transferring all remaining administrative and substantive authority to the designated presiding authority, currently operating under the oversight of the South Carolina Supreme Court.

Respectfully submitted this 11<sup>th</sup> day of May, 2026.



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



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**Meaghan Poyer, Pro Se**  
P.O. Box 30386, Charleston, SC 29417  
[mneilandpoyer@gmail.com](mailto:mneilandpoyer@gmail.com)

# **EXHIBIT G**

**Pre-Filing Courtesy Copy of Petitioners' Supplemental  
Notice to Petition for Writ of Mandamus Reporting Ongoing  
14th Amendment Deprivation and Status of the Record**

**THE STATE OF SOUTH CAROLINA**  
**In the Supreme Court**

---

**IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT**

---

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

**v.**

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

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

---

**I. INTRODUCTION & THE CONTINUED FAILURE TO PERFORM  
MANDATORY DUTIES**

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

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

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

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

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

## **II. THE FOURTEENTH AMENDMENT SIGNIFICANCE OF THE CURRENT STATUS RECORD**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **IV. CONCLUSION**

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

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

Respectfully submitted this 11<sup>th</sup> day of May, 2026.



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**James C. ("Chris") McNeil, Pro Se**  
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# Section 5

May 11, 2026 Email to SC Supreme Court Petitioners write to ask why Petition is not on docket

[Back to table](#)

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

To the Clerk of Court:

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

Petitioners respectfully request written clarification on the following:

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

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

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

Sincerely,

James C. McNeil & Meaghan Poyer  
Plaintiffs Pro Se  
PO Box 30386  
Charleston, SC 29417  
Email: [chris@thaut.io](mailto:chris@thaut.io); [mcneilandpoyer@gmail.com](mailto:mcneilandpoyer@gmail.com)  
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Forthcoming: *Strategic Thought Leadership: The Book*

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

# Section 6

May 11, 2026 SC Supreme Court docket check

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

1 pdf print with no parameters

1 pdf print of Hicks case number 2026-00915, which disappeared from the docket between May 15 and May 19, 2026.

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- Cases
- Case Search**
- Participant Search

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

**Case Search**

**Court:** Supreme Court

**Group:**

**Type:**

**Case Title:**

**Appellate Case No.:**

**Exclude Closed Cases:**

**Filed Date From:** 05/01/2025

**Filed Date To:** 05/11/2026

**Search**

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

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

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

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

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

Cases

Case Search

Participant Search

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

**Case Information: 2026-000915**

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

**- Party Information**

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

**Views**

**Display:** Descending

**Event Information**

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

# Section 7

May 12, 2026 “Answers in Red” email

responding to Petitioners

and

attached Return from Charleston Common Pleas

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

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

[Back to table](#)

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

Good morning,

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

Thank you,  
Kristen

---

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

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

To the Clerk of Court:

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

Petitioners respectfully request written clarification on the following:

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

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

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

Sincerely,

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

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

Forthcoming: *Strategic Thought Leadership: The Book*

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

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Section 8

Email from Kristen Porter at the SC Supreme Court

Attached letter from the SC Supreme Court Clerk of Court Patricia Howard stating "Extraordinary writs ... not available on C-Track Public Access."

and attached Return from Charleston Clerk of Court Julie Armstrong

2026-000919 - McNeil - Response.pdf

[Back to table](#)

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

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

Thank you,
Kristen

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

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

Good afternoon Kristen,

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

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

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

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

verification.

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

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

Plaintiffs (Pro Se):

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

Defendants and Counsel of Record:

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

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

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

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

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

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

- Email: jeff@jwklegal.com
-

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

Thank you again for your continued courtesy and professionalism.

Sincerely,

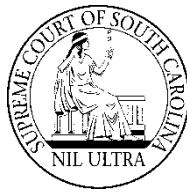
James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
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Chris McNeil
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Host of Podcast: *[Thought Leadership Studio](#)*

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

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

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# The Supreme Court of South Carolina

PATRICIA A. HOWARD  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

BLAIRE CANN  
CHIEF DEPUTY CLERK

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

May 14, 2026

James C. McNeil  
PO Box 30386  
Charleston SC 29417

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

Dear Mr. McNeil,

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

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

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

Sincerely,

*Patricia A. Howard*

CLERK

cc:

Holly Palmer Beeson

Edward L. Knisley, Jr.

Andrew LaRoche Hethington

Alicia Noel Bolyard

Christopher William Manning

Meaghan Poyer

The Honorable Thomas J. Rode

The Honorable Jennifer Blanchard McCoy

The Honorable Dale E. Van Slambrook

# Section 9

May 14, 2026 Response Email from SC Supreme Court

and

Attached pdf letter from the Clerk of the Supreme Court

[Back to table](#)

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

Good afternoon Kristen,

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

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

### **I. The Documented Inconsistency on C-Track Public Access**

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

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

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

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

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

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

## II. Clarification Requests

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

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

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

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

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

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

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

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

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

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

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

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

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

## V. Closing

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

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

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

Sincerely,

Chris McNeil

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

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

Forthcoming: *Strategic Thought Leadership: The Book*

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

**Attachments:**

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

---

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

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

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

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

**Subject:** Response to Request

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

Thank you,  
Kristen

---

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

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

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

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

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

Good afternoon Kristen,

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

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

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

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

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

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

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

---

#### Plaintiffs (Pro Se):

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

---

#### Defendants and Counsel of Record:

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

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

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

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

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

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

- Phone: 843-790-5182
- Email: [jeff@jwklegal.com](mailto:jeff@jwklegal.com)

---

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

Thank you again for your continued courtesy and professionalism.

Sincerely,

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

-----

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

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

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

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Section 10

SC Supreme Court Docket Check pdf prints

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

Printed pdf of Parameters

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

2 prints of search results:

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

[Back to table](#)

Cases

Case Search

Participant Search

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

Case Search

| | | | | | |
|---------------|------------------------|------------------------------|-------------------------------------|-------------------------|------------|
| Court: | Supreme Court ▾ | Case Title: | <input type="text"/> | Filed Date From: | 05/01/2024 |
| Group: | Orig. Jur. and Writs ▾ | Appellate Case No.: | <input type="text"/> | Filed Date To: | 05/15/2026 |
| Type: | Extraordinary Writ ▾ | Exclude Closed Cases: | <input checked="" type="checkbox"/> | Search | |

1 to 5 of 5 rows are displayed.

Search Results

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

1 to 5 of 5 rows are displayed.

Cases

Case Search

Participant Search

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Case Search

Court: Supreme Court ▼

Case Title:

Filed Date From: 05/01/2024

Group: Orig. Jur. and Writs ▼

Appellate Case No.:

Filed Date To: 05/15/2026

Type: Extraordinary Writ ▼

Exclude Closed Cases:

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1 to 16 of 16 rows are displayed.

Search Results

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

1 to 16 of 16 rows are displayed.

Section 11

SC Supreme Court Docket Check pdf prints

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

Printed pdf of Parameters

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

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

Hicks case number 2026-00915 is no longer on the docket in either search.

[Back to table](#)

Cases

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Case Search

Court: Supreme Court ▼

Case Title:

Filed Date From:

05/01/2024



Group: Orig. Jur. and Writs ▼

Appellate Case No.:

Filed Date To:

05/15/2026



Type: Extraordinary Writ ▼

Exclude Closed Cases:



Search

1 to 4 of 4 rows are displayed.

Search Results

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

1 to 4 of 4 rows are displayed.

- Cases
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Case Search

Court: Supreme Court ▼ **Case Title:** **Filed Date From:** 05/01/2024

Group: Orig. Jur. and Writs ▼ **Appellate Case No.:** **Filed Date To:** 05/15/2026

Type: Extraordinary Writ ▼ **Exclude Closed Cases:** **Search**

1 to 15 of 15 rows are displayed.

Search Results

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|---------------|------------------------|--|----------------------|--------------------|---------------|----------------|------------------|
| Supreme Court | 2026-000383 | Christopher E. Mills; Spero Law LLC v. Acting Circuit Judge Jean H. Toal, etc. | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 02/20/2026 | Ended |
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| Supreme Court | 2025-002174 | Citizens Alliance for Government Integrity v. York County, et al. | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 10/28/2025 | Ended |
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| Supreme Court | 2025-001670 | State of South Carolina v. Michael Wilson Pearson | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/21/2025 | Ended |
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| Supreme Court | 2025-000524 | Mikal D. Mahdi v. Bryan P. Stirling, Director, etc. | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 03/18/2025 | Ended |
| Supreme Court | 2025-000309 | Brad Keith Sigmon v. Bryan P. Stirling, Director, et al. | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 02/20/2025 | Ended |
| Supreme Court | 2024-002113 | Marion Bowman, Jr. v. State of South Carolina | Orig. Jur. and Writs | Extraordinary Writ | Death Penalty | 12/16/2024 | Ended |
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| Supreme Court | 2024-001423 | John A. Tibbs v. Asbestos Corporation Limited (5) | Orig. Jur. and Writs | Extraordinary Writ | Public Access | 08/30/2024 | Held in Abeyance |

1 to 15 of 15 rows are displayed.

Section 12

Email from SC Supreme Court

Kristen from SCSC wrote “Please see the attached order in the above referenced case.”

And attached

2026-000919 - McNeil.pdf and McNeil Filing 05.12.26.pdf

(stamped pages only, see Section 4 for full version)

[Back to table](#)

Delete
 Archive
 Report
 Reply
 Reply All
 Forward
 Respond
 All Apps
 Quick Steps
 Move
 Tags
 Editing
 Immersive
 Translate
 Zoom
 Reply with Scheduling Poll
 Find Time

2026-000919 - McNeil v. Ninth Judicial Circuit Court

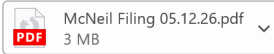
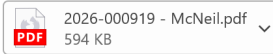


Supreme Court Filings <supctfilings@sccourts.org>

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

Thu 5/21/2026 11:50 AM

Reply
 Reply All
 Forward



Open PDFs in Adobe Acrobat

Start your reply all with: [Order received, thank you.](#) [Received, thank you.](#) [Thank you!](#) Feedback

Please see the attached order in the above referenced case.

Thank you,
Kristen

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# The Supreme Court of South Carolina

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

v.

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

Appellate Case No. 2026-000919

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## ORDER

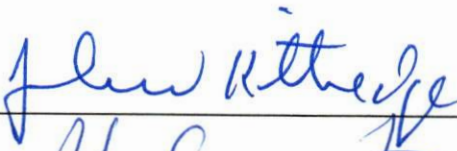

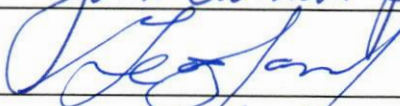

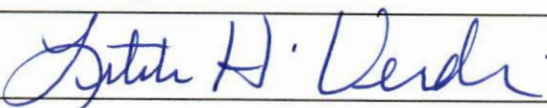
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Petitioners have filed a *pro se* petition for a writ of mandamus asking this Court to direct the circuit court in Charleston to rule on (1) their motion to file a second amended complaint filed on October 24, 2025; (2) their motion for ADA accommodations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

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

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

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

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

Columbia, South Carolina  
May 21, 2026

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

---

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

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

RECEIVED

May 12 2026

S.C. SUPREME COURT

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

---

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

To the Clerk of Court:

Please accept for filing the attached:

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

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

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

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

Respectfully,

James C. McNeil & Meaghan Poyer  
Plaintiffs Pro Se  
PO Box 30386  
Charleston, SC 29417  
Email: [chris@thaut.io](mailto:chris@thaut.io); [mcneilandpoyer@gmail.com](mailto:mcneilandpoyer@gmail.com)  
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**May 12 2026**

**S.C. SUPREME COURT**

**THE STATE OF SOUTH CAROLINA  
In the Supreme Court**

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**IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT**

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

**v.**

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

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

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**I. INTRODUCTION & THE CONTINUED FAILURE TO PERFORM  
MANDATORY DUTIES**

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

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**May 12 2026**

**S.C. SUPREME COURT**

# **EXHIBIT A**

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