

EXHIBIT C Series

Listings, Images, Matterport, Syndication

- **Ex. C-1 — Initial public listing while occupied**
- **Ex. C-2 - July 14 call between “Addy” and Meaghan on Matterport**
- **Ex. C-3 - Affidavit of Meaghan Poyer (no consent for image use, misrepresentation)**
- **Ex. C-4 - Screenshots and images of some of the published stills and the virtual tour**

Ex. C-1 — Initial public listing while occupied

Via Redfin Sales & Tax history

OverviewFeesAmenitiesSchoolsSale & Tax History

Sale HistoryTax History

Today

Sep 23, 2025Listed for Rent\$5,276/mo

DateAPPFOLIO #2Price

Rental description

This home is currently under renovation and will be availble for move-in October 2025. The kitchen will feature new shacker style cabinets, quartz countertops and stainless steel appliance. DISCLAIMER. Applicant(s) must take occupancy within 14 days from the date of application or unit availability date. At Meridian Residential Group, we strive to provide an experience that is cost-effective and convenient. That's why we provide a Resident Benefits Package (RBP) to address common headaches for our residents. Our program handles pest control, air filter changes, utility set up, credit building and more at a rate of \$45.00/month, added to every property as a required program. More details upon application. In addition to RBP, we provide access to liability insurance that meets your needs. Please note this property is managed by Meridian Residential Group, rental applications and payments are only accepted online via our company website. Meridian will never ask for payment via Cash, Cash App, Venmo, PayPal, or any other third-party app. Contact us to schedule a showing.

Show less ^

Jul, 2025

Jul 26, 2025Rental Removed\$5,276/mo

DateSHOWMOJO #1Price

Jul 19, 2025Price Changed\$5,276/mo

DateSHOWMOJO #1Price

Jun 29, 2025Listed for Rent\$3,050/mo

DateSHOWMOJO #1Price

Ex. C-2 - July 14 call between “Addy” and Meaghan on Matterport

yealink

No Service

History Details

2 13 PM 2025-09-19



Name: 8432616344
Number: 8432616344
Time: 2025-07-14 8:43:29 AM
Line: Line 1
Duration: 00:08:02

123/300



T48S

Ex. C-3 - Affidavit of Meaghan Poyer

Describes misrepresentation of Matterport Tour by Addison Bayles: “AI will be used to remove you and your belongings” and lack of consent any images of Plaintiffs and their belongings to be posted online, including the still imagers from the earlier shoot by Meridian predecessor Roadstead that was done under the premise of an “inspection” .

AFFIDAVIT OF MEAGHAN POYER

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

I, Meaghan Poyer, being duly sworn, state under oath as follows:

1. I am over 18 years of age, competent to testify, and make this affidavit based on my personal knowledge.
2. My husband, James C. "Chris" McNeil, and I resided at **181 Gordon Street, Charleston, South Carolina** from 2020 through August 2025.
3. On **July 14, 2025**, I received a **text message** from **Meridian Residential Group** stating they would be coming to 181 Gordon Street to take pictures. The text contained a mismatch between the stated date and day of the week and conflicted with our lease's 24-hour notice requirement. I requested a phone number to discuss.
4. That same day, I **called 843-261-6344** from my **College of Charleston office phone (843-953-4884, VoIP Yealink T48)** and spoke with a woman who identified herself as **"Addy."** We clarified the correct appointment date/time. I told her she needed to coordinate with my husband because he works from home and often has meetings.
5. I asked **what** Meridian intended to photograph. "Addy" said they were coming to **photograph the interior using Matterport** and asked that we **secure our pets**.
6. I told her our home was **not in a state to be photographed** and that **we did not want ourselves or our personal belongings appearing in any images posted online**.
7. "Addy" stated that **with Matterport, we and our personal belongings would be removed from the images**. I understood that to mean that no image or tour made available to the public would display us or our belongings.
8. Based on that representation, we allowed interior imaging to occur the next day. At **no time** did I sign or receive **any written consent or release** authorizing capture or publication of our likenesses, identities, or belongings for marketing purposes.
9. **Roadstead still-photo set**. Separate from the 2025 Matterport session, there exists a **still-photo set** that Roadstead captured during a purported "inspection" while we were tenants (believed to be **in or about 2022**). In **September 2025**, I personally observed these **still images**—which depict **me** and our **personal belongings** and interior rooms—**published on multiple rental websites**. I saw them on, for example, **Zillow, Trulia, HotPads, Redfin, and Apartments.com**, and understand from the screenshots and listings that they were **syndicated to at least ~15 platforms** (and possibly more through downstream feeds).
10. **Meridian Matterport virtual tour (7/15/2025; embedded/linked distribution)**. On **July 15, 2025**, Meridian arranged a **Matterport** interior imaging session. The

resulting **virtual tour** depicts **my husband, James (“Chris”) McNeil**, our dog **Rocket** (elderly, blind, wearing **medical diapers**), and our **Thaut Thought Leadership** materials/signage. I personally accessed the tour via **links embedded** in rental listings and via a **direct URL**; the tour remained **publicly viewable** until **on or about September 23, 2025**, when the link returned “**Page Not Found.**”

11. **Distinct sources; no written consent for either.** At **no time** did I sign or receive **any written consent or release** authorizing **commercial publication** of (a) the **Roadstead still-photo set** or (b) the **Matterport tour**. Roadstead took pictures as part of an “inspection” and I permitted the July 15 imaging **only** because Meridian told us that “**AI**” **would remove us and our belongings** from any images made publicly available.
12. **Duration and scope as I personally observed.** I observed the **Roadstead stills** displayed on multiple platforms **from on or about September 18, 2025 through at least September 23, 2025**, and I observed the **Matterport tour** that was available until **September 23, 2025**. I do **not** know the **full extent** of distribution; based on what I saw.
13. The facts stated above are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Meaghan R Poyer

Meaghan Poyer

Subscribed and sworn to before me this 23 day of October, 2025, by **Meaghan Poyer**, who is personally known to me or produced identification

Enid R. Idelsohn

Notary Public for South Carolina

Printed Name: ENID R. IDELSOHN

My Commission Expires: MAY 2, 2034
(Seal)

ENID R. IDELSOHN
Notary Public - State of South Carolina
My Commission Expires
May 2, 2034

Ex. C-4 - Screenshots and images of some of the published stills and the virtual tour

3 images of Meaghan on Zillow (1 in mirror)

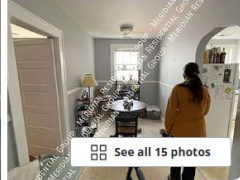




https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/

Listing

https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/

Get a map < Back to search Zillow Save Share More

Off market



See all 15 photos

Zestimate®
\$918,600
181 Gordon St, Charleston, SC 29403

Est. refi payment: \$5,122/mo [Refinance your loan](#)

Single Family Residence	Built in ----	-- sqft lot
\$918,600 Zestimate®	\$515/sqft	\$3,553 Estimated rent

3 beds **2** baths **1,784** sqft

Get a cash offer in 3 minutes
Find out how much your home could sell for in as little as 3 minutes with a no-obligation cash offer.

Estimated market value
\$918,600
What is this number?

[Start now](#)

Home value

Sort: Homes for You

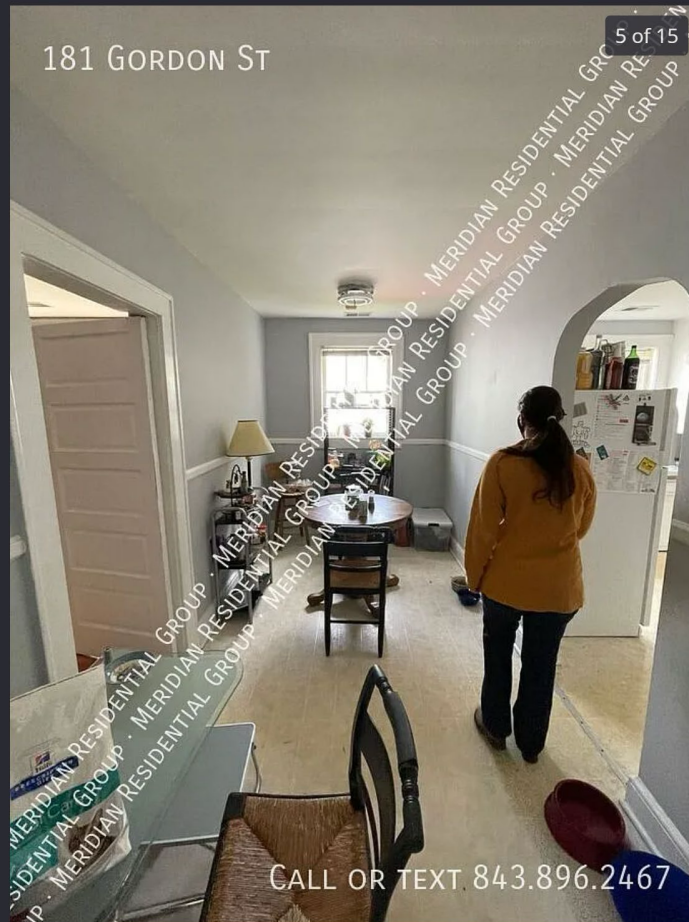
gft - Townhouse for sale
H21, Charleston, SC 29401

gft - House for sale
eston, SC 29407

Images of Meaghan –

zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/?mmlb=g,4

Photos



Off Market: \$918,600 (3 beds, 2 baths, 1,784 Square Feet)

In mirror

 [zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/?mmlb=g,6](https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/?mmlb=g,6)

Photos


181 GORDON ST

7 of 15



Off Market: \$918,600 (3 beds, 2 baths, 1,784 Square Feet)

In doorway

 [zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/?mmlb=g,12](https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/?mmlb=g,12)

Photos



Off Market: \$918,600 (3 beds, 2 baths, 1,784 Square Feet)

[https://www.realtor.com/rentals/details/181-Gordon-St Charleston SC 29403 M59688-00267](https://www.realtor.com/rentals/details/181-Gordon-St_Charleston_SC_29403_M59688-00267)

**Time's running out.
3 months of nonstop music.**

 **Premium**

Individual plan only. \$11.99/month after. Terms and conditions apply. Open only to users who haven't already tried Premium.

Manage rentals

The main image shows a living area with a round wooden table, four chairs, and a person standing with their back to the camera. There is a fireplace on the left and a window on the right. A watermark 'MERIDIAN RESIDENTIAL GROUP' is visible across the image.

The top right photo shows a kitchen with a white countertop, a sink, and various items on the counter. A watermark 'MERIDIAN RESIDENTIAL GROUP' is visible.

The middle right photo shows a bathroom with a pink bathtub, a green shower curtain, and a white toilet. A watermark 'MERIDIAN RESIDENTIAL GROUP' is visible.

The bottom right photo shows a bedroom with a bed, a nightstand, and a window. A watermark 'MERIDIAN RESIDENTIAL GROUP' is visible.

At the bottom left of the main image, there is a button that says 'All 15 photos'. At the bottom right, there is a button that says '5/15'.

The description and property details below are from when the property was last available for rent.

A map showing the location of the study area. It features a red circle with a black dot in the center, indicating the specific location. The map includes a river (Genesee River) and a road (Morrisville). The word "GENESEE" is visible on the map.

Below with time/date bottom right

realtor.com/rentals/details/181-Gordon-St-Charleston_SC_29403_M59688-00267

Free 5G phones

With 24 monthly bill credits when you add a qualifying line. For well-qualified customers, plus tax & \$35 device connection charge req'd.

Get yours now

Contact us before cancelling entire account to continue remaining bill credits, or credits stop & balance on required finance agreement is due (e.g., \$299.97 - promo ends 02/20/25). Bill credits end if you pay off device early. Tax on pre-credit price due at sale. Limited time, subject to change. Qualifying credit and service (\$50+/mo. plan w/ AutoPay plus taxes/fees) required.

realtor.com


Buy Sell Rent Mortgage Find an Agent My Home News & Insights

Manage rentals Advertise

Log in Sign up


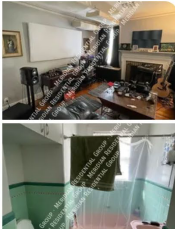
Back Charleston, SC

Rentals > South Carolina > Charleston County > Charleston > 29403 > 181 Gordon St



All 15 photos

7/15




Get moving quotes

Off-market

This property is not currently for rent or sale on Realtor.com.

The description and property details below are from when the property was last available for rent.

3 bed 2 bath 1,784 sqft



Sign up for property alerts

Save this listing and we'll send you email notifications about this property.

Get notified

Free 5G phones

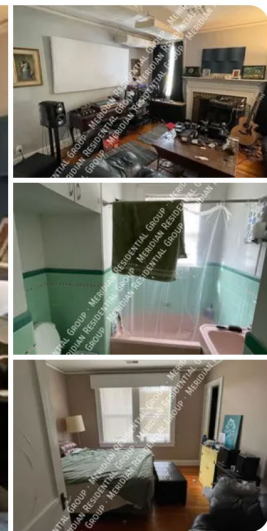
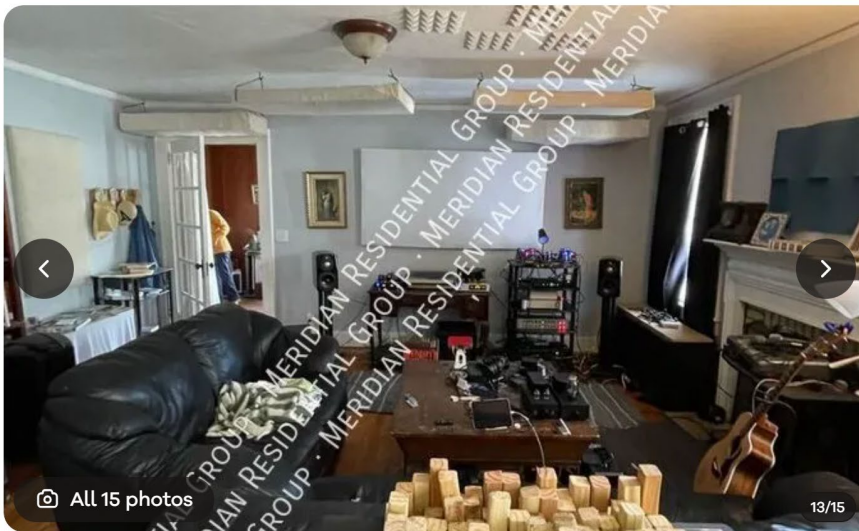
With 24 monthly bill credits when you add a qualifying line. For well-qualified customers, plus tax & \$35 device connection charge req'd.

Get yours now

Contact us before cancelling entire account to continue remaining bill credits, or credits stop & balance on required finance agreement is due (e.g., \$299.97 - promo ends 02/20/25). Bill credits end if you pay off device early. Tax on pre-credit price due at sale. Limited time, subject to change. Qualifying credit and service (\$50+/mo. plan w/ AutoPay plus taxes/fees) required.

79°F

10:05 AM 9/19/2025



All 15 photos

13/15

Get moving quotes

Off-market



This property is not currently for rent or sale on Realtor.com.

The description and property details below are from when the property was last available for rent.

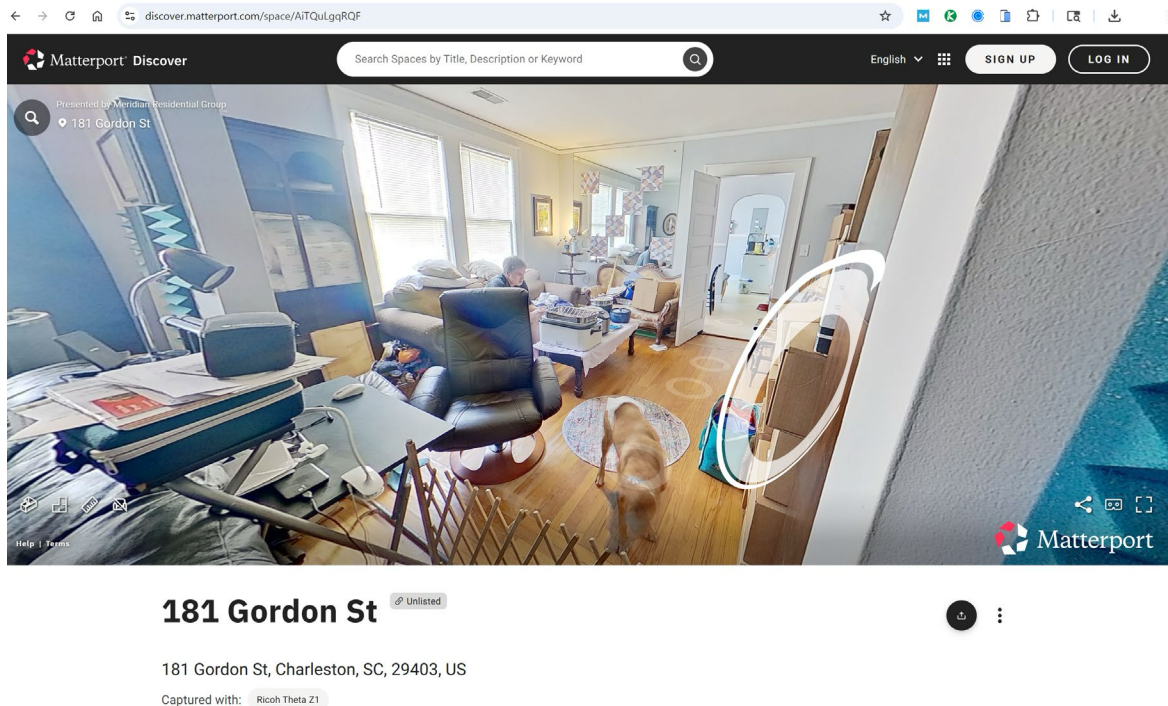
3 bed 2 bath 1,784 sqft



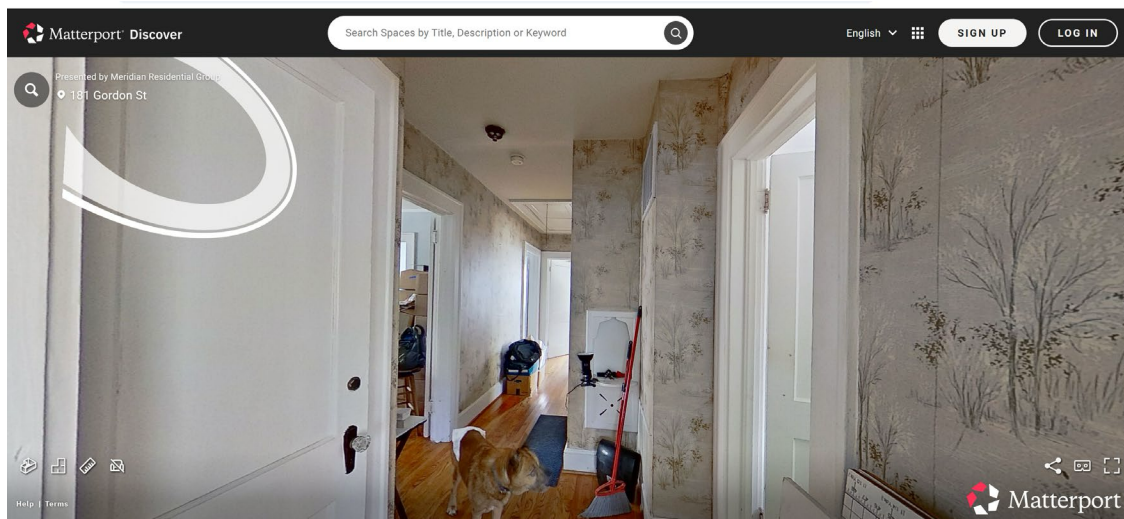
Matterport Virtual tour

<https://discover.matterport.com/space/AiTQuLgqRQF>

They show Chris McNeil and Plaintiffs' dog, Rocket in diapers in a "virtual tour" and "Presented by Meridian Residential Group". Plaintiff's company name is prominent on a sign. (time/date bottom right in first image)



Rocket is also seen in the hall



9/22/25 Sites with images and time/date stamps

Matterport with timestamp 9/22/25, day before removal

realtor.com/rentals/details/181-Gordon-St_Charleston_SC_29403_M59688-00267

7:21:10 PM
Monday, September 22

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 82°F / 72°F

Set up your calendars to see where you need to be

Get started

Hobbit Day
A day in the Shire

Sep 25
World Maritime Day
Anchors aweigh for fleet

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< Back Charleston, SC Rentals > South Carolina > Charleston County > Charleston > 29403 > 181 Gordon St

Sign up for property alerts
Save this listing and we'll send you email notifications about this property.
Get notified

Get moving quotes

Off-market

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3 bed 2 bath 1,784 sqft

181 Gordon St, Charleston, SC 29403

All 15 photos

1/15

Map

Trulia 9/22/25

realtor.com/rentals/details/181-Gordon-St_Charleston_SC_29403_M59688-00267

7:21:10 PM
Monday, September 22

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
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realtor.com Buy Sell Rent Mortgage Find an Agent My Home News & Insights Manage rentals Advertise Log in Sign up

< Back Charleston, SC Rentals > South Carolina > Charleston County > Charleston > 29403 > 181 Gordon St

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Save this listing and we'll send you email notifications about this property.
Get notified

Get moving quotes

Off-market

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The description and property details below are from when the property was last available for rent.

3 bed 2 bath 1,784 sqft

181 Gordon St, Charleston, SC 29403

All 15 photos

1/15

Map

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[Charleston](#)
[29403](#)
[181 Gordon St](#)

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Get moving quotes

Off-market

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The description and property details below are from when the property was last available for rent.

3 bed 2 bath 1,784 sqft

181 Gordon St, Charleston, SC 29403

7:21:10 PM

Monday, September 22

September 2025

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Today 82°F / 72°F

Set up your calendars to see where you need to be

[Get started](#)

Hobbit Day
A day in the Shire

Sep 25

World Maritime Day
Anchors weigh! Eat, rent!

[Buy](#)
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All 15 photos

Get moving quotes

Off-market

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3 bed 2 bath 1,784 sqft

181 Gordon St, Charleston, SC 29403

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Get notified

7:21:10 PM

Monday, September 22

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
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Today 82°F / 72°F

Set up your calendars to see where you need to be

Get started

Hobbit Day
A day in the Shire

Sep 25

World Maritime Day
Anchors aweigh for fun!

Ex. C-5 - Comparator listings (Meridian ads that do not show tenants).



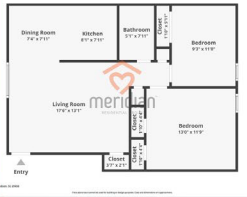

All other Meridian listings examined only show empty units or with staged furnishings. No other listings appear “lived in”.

meridianresidentialgroup.com/listings/detail/d811fadd-97a6-4968-a5ec-aed9f57333a7

meridian

Home Services Availability About FAQ Contact Resident Benefits Package

20 images



RENT
\$1,469
Available NOW

2 beds 1 bath 880 sqft.

108 Pinewood St, Apt. #A, Ladson, SC 29456
2 bed / 1 bath ~ Ladson, SC





Welcome to this charming 2 bedroom, 1 bathroom house located in Ladson, SC. This cozy home features a convenient 1st floor layout, perfect for easy access. The interior boasts beautiful LVP flooring throughout, adding a touch of modern elegance. Residents will also have access to a community pool, ideal for relaxing and enjoying the warm South Carolina weather. Don't miss out on this wonderful opportunity to make this house your new home!

meridianresidentialgroup.com/listings/detail/9b7fe276-18e8-4a4a-8046-cb16a517f36e

meridian

Home Services Availability About FAQ Contact Resident Benefits Package

12 images



RENT
\$2,900
Available NOW

2 beds 2 baths 1,123 sqft.

23 North Tracy, Charleston, SC 29403
Charming Charleston Living ~ 2 bedroom / 2 bath w/flex space

Available for Move-In: TODAY!

Step into comfort and convenience with this beautifully maintained and recently renovated 2 bedroom, 2 bath home, with a study/flex space, nestled in the desirable Hampton Park Terrace district. Just minutes from WCCO, The Citadel, and College of Charleston. A Must-See! Move-in ready with stylish finishes.



24 images



RENT
\$2,930

Available NOW

2 beds 1 bath 1,373 sqft.

114 Alexander St #B, Charleston, SC 29403

Modern 2-Bedroom Apartment in Historic Mazyck-Wraggborough

Discover the perfect combination of historic charm and modern comfort at 114 Alexander Street in the heart of Charleston's desirable Mazyck-Wraggborough neighborhood. This beautifully renovated 2-bedroom, 1-bath apartment offers a fresh and stylish living space just steps away from the best the city has to offer.

Inside, you'll find luxury vinyl plank flooring, ceiling fans for year-round comfort, sleek granite countertops,



16 images



RENT
\$1,895

Available NOW

2 beds 1 bath 800 sqft.

43 Rose Lane, #C, Charleston, SC 29403

Move-In by 11/1/2025 and receive One Month Free when you sign a 18 month lease

****Move-In by 11/1/2025 and receive One Month Free when you sign a 18 month lease****

Welcome to 43 Rose Lane - a beautifully updated 2-bedroom, 1-bath apartment ideally situated in the vibrant Cannonborough/Elliottborough neighborhood of downtown Charleston. Located just off Hwy 26 and Rutledge,



RENT
\$1,566
Available NOW

2 beds 1.5 baths 1,052 sqft.

303 Andrea Lane, Hanahan, SC 29410 2 bedroom / 1.5 bath Townhome ~ Hannahan, SC

Large 2 bedroom 1.5 bath townhome with back patio in popular Otranto Station. The cute kitchen overlooks the living dining room combo. One (1) assigned parking space. Rent includes water, sewer, landscaping, and groundskeeping. Great location, close to Trident Hospital, shopping, restaurants, Wannamaker Park, short drive to I26. Hanahan School District. Sidewalk goes full circle around the community. Mail center and trash in front of the community. Play park and Swimming Pool on site.



RENT
\$2,395
Available NOW

1 bed 1 bath 672 sqft.

3 Coming St., #A, Charleston, SC 29401 1 bed / 1 bath ~ Coming October 2025

Introducing our newest addition to the Charleston, SC rental market - the 1 bed / 1 bath apartment. This renovated unit boasts modern stainless steel appliances, hardwood floors, and a convenient washer/dryer for added convenience. With off-street parking included, you can rest easy knowing your vehicle is safe and secure. Don't miss out on the opportunity to call this charming apartment home - contact us today for more information on leasing options.

EXHIBIT D

Sept 21, 2025 Evidence Preservation Notice Email and Takedown Notices.

(CoStar, Zillow, etc.)

- Takedown Notice/Image Preservation email to Eric Pettis September 21, 2025
- (move.com – realtor.com) Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095).pdf
- (Zillowgroup)Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095).pdf
- (Matterport)Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095).pdf
- (costargroup)Unauthorized Image Takedown & Cache Elimination Required – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095).pdf

From: chris.thaut.io
To: [Eric Pettis](mailto:Eric.Pettis@mcneilandpoyer.com); mcneilandpoyer@gmail.com
Cc: [Desja Wilder](#)
Subject: URGENT - Evidence Preservation Notice - McNeil & Poyer v. SAC 181, LLC, et al. (Case No. 2025-CP-10-05095)
Date: Sunday, September 21, 2025 11:14:00 AM
Importance: High
Sensitivity: Confidential

Mr. Pettis,

This constitutes formal notice of your clients' duty to preserve evidence under South Carolina Rules of Civil Procedure **in connection with systematic privacy violations, fraudulent conduct, and newly discovered safety endangerment** arising from unauthorized commercial exploitation of our family's images and personal information.

JUSTIFICATION FOR WEEKEND NOTICE

This notice is sent on Sunday due to:

- **Ongoing Privacy Violations:** Images of my family remain published across multiple commercial platforms without consent, causing continuing damages each day
- **Safety Concerns:** Unauthorized publication of our residential address and personal images creates ongoing security risks as Plaintiffs have documented harassment history from family members requiring restraining orders and no-contact protocols. Public court documents now create searchable connections between the published address and our current location, potentially enabling continued harassment and requiring court-ordered address protection measures.
- **Evidence Destruction Risk:** Delay until business hours provides opportunity for coordinated evidence destruction or modification
- **False Endorsement/Personal Defamation:** Meridian watermarks and 'Presented by Meridian Residential Group' branding falsely associate Plaintiffs with a company they are actively suing for systematic misconduct. This creates the damaging impression that Plaintiffs endorse or affiliate with an organization documented for tenant exploitation and fraudulent practices, directly harming their personal character, integrity, and reputation. The forced association causes ongoing personal and professional damage.
- **Duty to Mitigate:** Plaintiffs have a legal obligation to mitigate ongoing damages by taking immediate action to preserve evidence and halt continuing violations

PRESERVATION REQUIREMENTS

This includes all photographs, video, and Matterport imagery originally obtained or generated by Roadstead Residential Property Management prior to Meridian's acquisition of that portfolio, as well as any files carried over, imported, or repurposed by Meridian or its affiliates. Defendants remain responsible for preserving those materials to the extent they assumed

control or benefited from them.

Your clients must immediately preserve all documents, communications, electronic files, and physical materials related to:

1. Photography and Image Usage (2020-Present)

- All photographs, videos, and virtual tours of 181 Gordon Street
- All versions of images containing Plaintiffs, their belongings, pets, or business signage
- Metadata and EXIF data for all images
- Original source files (RAW, JPEG, TIFF, Matterport cloud data), not merely exported copies
- Matterport dashboard access, accounts, and administrative controls
- All contracts with photographers, marketing vendors, or platform services

2. Platform Publications and Marketing

- All accounts, credentials, and administrative access for: Zillow, Realtor.com, Trulia, Matterport, ApartmentHomeLiving, and any other real estate or rental platforms
- All communications with platform representatives regarding image uploads, modifications, or takedown requests
- All marketing materials, brochures, or advertisements featuring the property

3. Internal Communications

- All emails, text messages, phone records, and internal communications between Meridian, SAC 181, MRG Investing, the Bayleses, and any third parties regarding:
 - Photography or marketing of 181 Gordon Street
 - Tenant privacy or consent for image usage
 - Platform management or image publication
 - This litigation or the underlying tenant relationship

4. Corporate Documentation

- All documents evidencing corporate relationships, shared operations, or unified management between defendants
- All financial records showing asset transfers, shared expenses, or commingled funds
- All professional licenses, insurance policies, and regulatory filings

ESCALATION CONSEQUENCES

- **Injunctive Relief:** Failure to immediately cease unauthorized image usage will result in emergency motion for temporary restraining order and preliminary injunction, with

defendants bearing all associated costs.

- **Regulatory Exposure:** Continued violations may trigger complaints to the South Carolina Real Estate Commission regarding systematic tenant exploitation and professional misconduct.
- **Expanded Liability:** This preservation notice covers initial evidence categories. Additional preservation requirements will follow as our investigation expands into the full scope of defendants' business practices.

IMMEDIATE ACTION REQUIRED

1. **Document Retention:** Issue litigation hold notices to all employees, contractors, and affiliates
2. **Platform Preservation:** Secure all online accounts and prevent any modifications or deletions
3. **Third-Party Notice:** Notify all vendors, photographers, and service providers of preservation duties
4. **Compliance Confirmation:** Provide written confirmation of preservation measures by **Monday, September 22, 2025, 5:00 PM**

TAKEDOWN NOTICE COORDINATION

Plaintiffs will be submitting takedown notices to all identified platforms today and tomorrow citing privacy violations and lack of consent. Your clients should coordinate with these platforms to ensure preservation of all materials before any removal occurs.

SPOLIATION CONSEQUENCES

Failure to preserve evidence may result in:

- Adverse inference instructions to the jury
- Sanctions under SCRPC Rule 37
- Independent claims for obstruction of justice under S.C. Code § 16-9-340
- Enhanced punitive damages for destruction of evidence
- Violation of Rule 37(b) (failure to comply with court order) and Rule 37(e) (ESI destruction)

ONGOING DAMAGES

Resolution Path: Immediate compliance with preservation duties and cessation of unauthorized image usage represents the most efficient path to resolution. All other paths lead to expanded litigation, regulatory scrutiny, and increased liability.

Plaintiffs will be actively monitoring all platforms and preservation compliance. Any modifications, deletions, or access restrictions will be immediately detected and reported to

the court.

Please confirm receipt of this notice and your clients' compliance measures within 24 hours.

Respectfully,

James C. ("Chris") McNeil and Meaghan Poyer

Pro Se Plaintiffs

480A Parkdale Dr

Charleston, SC 29414

chris@thaut.io | mcneilandpoyer@gmail.com

Case No. 2025-CP-10-05095

From: chris.thaut.io
To: Privacy@move.com
Cc: [Eric Pettis](#); [Desja Wilder](#); [C&M McNeil](#)
Subject: Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095)
Date: Sunday, September 21, 2025 4:43:00 PM
Importance: High
Sensitivity: Confidential

To Whom It May Concern,

We are Chris McNeil and Meaghan Poyer, former residents of 181 Gordon Street, Charleston, SC. We have identified unauthorized images of our home, personal belongings, and identifiable photographs of ourselves published on your platform under the account “Meridian Residential Properties.”

Unauthorized Use & Legal Violations

These images were taken under false pretenses and published without our knowledge or consent. Their continued display creates:

- **Invasion of Privacy** under South Carolina common law.
- **Misappropriation of Likeness** (common law right of publicity; **Restatement (Second) of Torts § 652C**).
- **False Light Invasion of Privacy** by implying our endorsement or affiliation with Meridian Residential Properties.

Immediate Action Required

We hereby demand:

1. **Immediate Takedown** – Remove all images, virtual tours, and related content depicting us, our belongings, or our former residence within 24 hours.
2. **Evidence Preservation** – Preserve, without alteration, all images, metadata, upload logs, account information, and vendor data including:
 - Original upload timestamps and dates
 - Account holder details for “Meridian Residential Properties”
 - IP/device information for uploads
 - Third-party vendor/photographer records
 - Viewing/download analytics and distribution history
3. **Written Confirmation** – Provide written confirmation of both takedown and preservation within 48 hours.

Legal Notice

These images are evidence in active litigation currently pending in Charleston County Common Pleas Court (Case No. 2025-CP-10-05095). Please treat this notice as a **legal hold**. Failure to

comply may expose your platform to spoliation consequences or contributory liability.

URL Requiring Immediate Removal:

https://www.realtor.com/rentals/details/181-Gordon-St_Charleston_SC_29403_M59688-00267

Contact for Legal Matters:

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs – Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

480A Parkdale Dr., Charleston, SC 29414

We expect your compliance and look forward to your confirmation.

From: chris.thaut.io
To: privacy@zillowgroup.com
Cc: [Eric Pettis](#); [Desja Wilder](#); [C&M McNeil](#)
Subject: Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095)
Date: Sunday, September 21, 2025 4:40:00 PM
Importance: High
Sensitivity: Confidential

To Whom It May Concern,

We are Chris McNeil and Meaghan Poyer, former residents of 181 Gordon Street, Charleston, SC. We have identified unauthorized images of our home, personal belongings, and identifiable photographs of ourselves published on your platform under the account “Meridian Residential Properties.”

Unauthorized Use & Legal Violations

These images were taken under false pretenses and published without our knowledge or consent. Their continued display creates:

- **Invasion of Privacy** under South Carolina common law.
- **Misappropriation of Likeness** (common law right of publicity; **Restatement (Second) of Torts § 652C**).
- **False Light Invasion of Privacy** by implying our endorsement or affiliation with Meridian Residential Properties.

Immediate Action Required

We hereby demand:

1. **Immediate Takedown** – Remove all images, virtual tours, and related content depicting us, our belongings, or our former residence within 24 hours.
2. **Evidence Preservation** – Preserve, without alteration, all images, metadata, upload logs, account information, and vendor data including:
 - Original upload timestamps and dates
 - Account holder details for “Meridian Residential Properties”
 - IP/device information for uploads
 - Third-party vendor/photographer records
 - Viewing/download analytics and distribution history
3. **Written Confirmation** – Provide written confirmation of both takedown and preservation within 48 hours.

Legal Notice

These images are evidence in active litigation currently pending in Charleston County Common Pleas Court (Case No. 2025-CP-10-05095). Please treat this notice as a **legal hold**. Failure to

comply may expose your platform to spoliation consequences or contributory liability.

URLs Requiring Immediate Removal:

[https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-](https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/)

[29403/10909318_zpid/](https://www.zillow.com/homedetails/181-Gordon-St-Charleston-SC-29403/10909318_zpid/)

<https://www.trulia.com/home/181-gordon-st-charleston-sc-29403-10909318>

Contact for Legal Matters:

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs – Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

480A Parkdale Dr., Charleston, SC 29414

We expect your compliance and look forward to your confirmation.

Respectfully,

Chris McNeil & Meaghan Poyer

From: chris.thaut.io
To: legal@matterport.com; abuse@matterport.com
Cc: epettis@bwpf-law.com; Desja Wilder; C&M McNeil
Subject: Unauthorized Image Takedown & Preservation Request – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095)
Date: Sunday, September 21, 2025 4:46:00 PM
Importance: High
Sensitivity: Confidential

To Whom It May Concern,

We are Chris McNeil and Meaghan Poyer, former residents of 181 Gordon Street, Charleston, SC. We have identified unauthorized images of our home, personal belongings, and identifiable photographs of ourselves published on your platform under the account “Meridian Residential Properties.”

Unauthorized Use & Legal Violations

These images were taken under false pretenses and published without our knowledge or consent. Their continued display creates:

- **Invasion of Privacy** under South Carolina common law.
- **Misappropriation of Likeness** (common law right of publicity; **Restatement (Second) of Torts § 652C**).
- **False Light Invasion of Privacy** by implying our endorsement or affiliation with Meridian Residential Properties.

Immediate Action Required

We hereby demand:

1. **Immediate Takedown** – Remove all images, virtual tours, and related content depicting us, our belongings, or our former residence within 24 hours.
2. **Evidence Preservation** – Preserve, without alteration, all images, metadata, upload logs, account information, and vendor data including:
 - Original upload timestamps and dates
 - Account holder details for “Meridian Residential Properties”
 - IP/device information for uploads
 - Third-party vendor/photographer records
 - Viewing/download analytics and distribution history
3. **Written Confirmation** – Provide written confirmation of both takedown and preservation within 48 hours.

Legal Notice

These images are evidence in active litigation currently pending in Charleston County Common Pleas Court (Case No. 2025-CP-10-05095). Please treat this notice as a **legal hold**. Failure to

comply may expose your platform to spoliation consequences or contributory liability.

URL Requiring Immediate Removal:

<https://discover.matterport.com/space/AiTQuLgqRQF>

Contact for Legal Matters:

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs – Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

480A Parkdale Dr., Charleston, SC 29414

We expect your compliance and look forward to your confirmation.

From: chris.thaut.io
To: ["copyright@costargroup.com"](mailto:copyright@costargroup.com); ["legal@costargroup.com"](mailto:legal@costargroup.com); ["privacy@costargroup.com"](mailto:privacy@costargroup.com)
Cc: epettis@bwpf-law.com; Desja Wilder; C&M McNeil
Subject: Unauthorized Image Takedown & Cache Elimination Required – Privacy Violation & Active Litigation (Case No. 2025-CP-10-05095)
Date: Sunday, September 21, 2025 5:36:00 PM
Attachments: [9-19-25-ApartmentHomeLiving-dot-com.JPG](#)
[9-21-25-ApartmentHomeLiving-dot-com.JPG](#)
Importance: High
Sensitivity: Confidential

To Whom It May Concern,

We are Chris McNeil and Meaghan Poyer, former residents of 181 Gordon Street, Charleston, SC. We have identified unauthorized images of our home, personal belongings, and identifiable photographs of ourselves that were published on ApartmentHomeLiving.com under the account "Meridian Residential Properties."

Current Status & Technical Issue

While the original listing appears to have been removed from ApartmentHomeLiving.com, images of our family remain accessible through Google Image Search and are cached on your servers and distribution network. Clicking the "Visit" button on these cached images redirects to your search function, but the images persist in search results, creating ongoing privacy violations.

Unauthorized Use & Legal Violations

These images were taken under false pretenses and published without our knowledge or consent. Their continued accessibility through cached versions and search engines creates:

- **Invasion of Privacy** under South Carolina common law
- **Misappropriation of Likeness** (common law right of publicity; Restatement (Second) of Torts § 652C)
- **False Light Invasion of Privacy** by implying our endorsement or affiliation with Meridian Residential Properties

Specific Images Requiring Elimination

Attached are screenshots demonstrating the ongoing privacy violation:

- **Google Image Search Results:** Shows cached images from ApartmentHomeLiving.com appearing in search results for "Meridian Residential Group 181 Gordon"
- **Redirect Behavior:** Demonstrates that clicking these cached images redirects to your search function (<https://www.apartmenthomeliving.com/n-charleston-sc/casas-alquiler/to-5000?page=2>) while the images remain accessible through Google's cache
- The group of images this one originated from (as per their appearance on Realtor.com,

Zillow.com, Trulia.com, and possibly other sites) clearly show identifiable images of the residents as well as personal belongings such as are evident in this particular image, with **Meridian watermarks prominently displayed** throughout the cached content originally hosted on ApartmentHomeLiving.com.

Search Terms for Your Technical Team:

- "Meridian Residential Group 181 Gordon"
- "181 Gordon Street Charleston Meridian"
- Any variations using property address + Meridian branding

Comprehensive Elimination Required

Given CoStar Group's sophisticated technical infrastructure and your experience with copyright enforcement, we require complete elimination including:

1. **Complete Cache Elimination** – Remove all cached versions, CDN copies, backup servers, and database entries containing these images
2. **Search Engine Coordination** – Submit removal requests to Google, Bing, and other search engines for cached image results
3. **Third-Party Syndication** – Eliminate from any API feeds, MLS distributions, or partner site syndications
4. **Technical Verification** – Provide confirmation that all traces have been eliminated from your technical infrastructure

Evidence Preservation Requirements

Simultaneously preserve, without alteration, all related data including:

- Original upload timestamps and account information
- Server logs showing image access and distribution
- CDN and backup system records
- API syndication logs and partner distribution records
- All communications regarding this property listing

Legal Notice & Compliance Timeline

These images are evidence in active litigation currently pending in Charleston County Common Pleas Court (Case No. 2025-CP-10-05095). Please treat this notice as a legal hold.

Required Actions:

- **24 hours:** Begin cache elimination process and provide status update
- **48 hours:** Provide written confirmation of preservation measures implemented
- **72 hours:** Complete elimination verification and search engine removal requests

Technical Expertise Notice

Plaintiffs possess technical expertise to verify complete elimination across your infrastructure. Superficial deletion attempts that leave cached, backup, or syndicated copies will be detected and constitute ongoing violations and evidence of bad faith compliance.

Contact for Legal Matters:

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs – Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

480A Parkdale Dr., Charleston, SC 29414

Given CoStar Group's commitment to copyright protection and intellectual property enforcement, we expect prompt and comprehensive compliance with this legitimate privacy protection request.

Respectfully,

Chris McNeil & Meaghan Poyer

EXHIBIT E

Platform swaps/overlays/removals

(e.g., “COMING SOON,” 404 on tour)

Timestamped screenshots taken on 9/26/25, after discovering more sites with the same ad.

padhopper

https://www.padmapper.com/rentals/26583339p/3-bedroom-2-bath-apartment-at-181-gordon-st-charleston-sc-29403?back=%2Fapartments%2Fcharleston-sc%3Fbox%3...

PadMapper Where to? SEARCHES FAVORITES POST A PAD SIGN IN

← Charleston Apartments

\$5,276
181 Gordon St · Apartment for Rent
Charleston Apartments · Wegener Terrace Apartments

PET FRIENDLY

I'm Interested

Pictures Map

COMING SOON

3 bed / 2 bath home - Available October 2025 (Meridian Residential Group)
(854) 205-2790

Details

Price	\$5,276
Bedrooms	3 Bedrooms
Bathrooms	2 Bathrooms
Available	
Square Feet	1,784 SQ
Min. Lease	
Address	181 Gordon St, Charleston, SC 29403
Broker Fee?	
Cats/Dogs Allowed?	Dogs & Cats

Staying Home?
[Call to request a live online tour](#)

Posted by:
3 bed / 2 bath home - Available October 2025 (Meridian Residential Group)
(854) 205-2790

10:22:19 AM
Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 73°F

Get started

Sep 27

World Tourism Day
Discover New Horizons

Sep 29

Zumper (1)

https://www.zumper.com/listings/26583339p/3-bedroom-wegener-terrace-charleston-sc?gallery=

< Nearby rentals IMAGE GALLERY

181 Gordon St
181 Gordon St, Charleston, SC 29403, USA
Pet friendly
3 Beds | 2 Baths | 1,784 sqft
\$5,276 | [View all fees](#)

Check availability View full details

Advertisement

TransUnion
Get your 3 credit scores & reports!
Learn More

COMING SOON

3 bed / 2 bath home - Available October 2025 (Meridian Residential Group)
(854) 205-2790

10:18:47 AM
Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 73°F

Get started

Sep 27

World Tourism Day
Discover New Horizons

Sep 29

[zumper.com/listings/2658333p/3-bedroom-wegener-terrace-charleston-scl/gallery#focus=2](#)

181 GORDON ST

Feel right at home with our resident benefits package.

- Filter Delivery Service** - Changing filters is as easy as opening the front door. This service helps you save up to \$200/year and reduces the hassles of repairs.
- Resident Rewards Program** - Rent day is now rewards day! You'll get cash, gift cards, and exclusive discounts you can use for up to 30 days on everyday expenses.
- Credit Building** - We report every on-time rent payment so you build credit. Average increases of 23 to 42 points in resident scores. We can report up to the end of 3 months for an immediate boost!
- SIM Identity Protection** - 1-in-4 Americans are victims of identity fraud. All adult leaseholders get SIM coverage backed by AIG, monitoring through BWA Watson, and a dedicated, US-based Identity Restoration Specialist.
- Move-In Concierge** - One call sets up utility, cable, and internet services - and helps you get the best prices and shortest wait times available.
- On-Demand Pest Control** - Pest Assurance, powered by Pest Shox, is targeted and effective pest control solutions.
- Online Portal** - Access your documents and pay rent through our easy-to-use online portal.
- 24/7 Maintenance Coordination** - It always seems like things happen after hours. This makes reporting issues early maintenance issues easy and fast either online or by phone.
- Verified Vendor Network** - Everyone who services your home is screened to exceed our standards for insurance, licensing, and professionalism for the job.
- Home Buying Assistance** - For those who want to make their homeownership, we'll help you get there.

[Learn more at \[secondnature.com/residents\]\(#\)](#)

By clicking "Accept All Cookies," you agree to the storing of cookies on your device to enhance site navigation, analyze site usage, assist in our marketing efforts. (See our privacy policy for details.)

[Customize Settings](#) [Reject All](#)

←

→

🏠

🔍

rent.com/r/181-gordon-st-charleston-sc-hv2500920046

☆

📧

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Rent.

🏡

| Charleston, SC Market Trends

| List a Property

| Business Solutions

| Moving Center

| Log In

| Sign Up

South Carolina

>

Charleston Houses

>

29403

>

181 Gordon St

(854) 205-2790

Send a Message

See 3 Photos

\$5,276

🏡

📌 Save

181 Gordon St

Charleston, SC 29403 | The Peninsula

3 Beds | 2 Baths | 1,784 Sqft

Overview

Special Features

About

Total Costs & Fees

Amenities & Features

Pet Policy

Similar Properties

Special Features

and discount codes available.

🚫 On-Demand Pest Control - Pest Assurance, powered by Pest Shave, is a targeted and effective pest solution.

💻 Online Portal - Access your documents and pay rent through our easy to use online portal.

🕒 24/7 Maintenance Coordination - It always seems like things happen after hours. This makes your property maintenance issues easy and fast either online or by phone.

👤 Vetted Vendor Network - Everyone who services your home is screened to exceed our standards for insurance, licensing and professionalism for the job.

To: 181 Gordon St

Message

Hello, I'd like more information about 181 Gordon St.

First and Last Name *

10:08:58 AM

Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today

🌤️ 87°F / 74°F

📅 Set up your calendars to see where you need to be

Get started

Sep 27

World Tourism Day
Discover New Horizons!

Sen 28

Clemsonoffcampus.com



https://www.clemsonoffcampus.com/housing/property/3-bed-2-bath-home-available-october-2025/w23kp4j

A service provided by Apartments.com | Housing | Roommates | Resources | Add a Listing

Sign In / Sign Up | CLEMSON UNIVERSITY

3 bed / 2 bath home ~ Available October 2025

181 Gordon St, Charleston, SC 29403 - Map - Charleston



(854) You must be signed in or

2 Photos

Last Updated: 2 Days Ago

Data provided by TravelTime

200+ miles to Clemson Area

Beds Bathes Rent Sq Ft Availability

10:05:34 AM

Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 74°F

Set up your calendars to see where you need to be

Get started

Sep 27

World Tourism Day
Discover New Horizons!

Sep 29

Apartmenthomeliving.com

https://www.apartmenthomeliving.com/rentals/181-Gordon-St-Charleston-SC-29403-10229676



apartmenthomeliving.com | Renting Tools | Renter University | Apartment Life | Rentals Near Me | Español

Charleston, SC

(854) 205-2790 | Check Availability

181 Gordon St

Charleston, SC 29403



3 Bedroom - Home for Rent

3BR, 2BA Home	\$5,276 Price	1,784 Square Feet	Available Now Availability
------------------	------------------	----------------------	-------------------------------

Map showing location near Mary Ellen Dr and WAGENER TERRACE

Contact
181 Gordon St
181 Gordon St

9:59:30 AM

Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 74°F

Set up your calendars to see where you need to be

Get started

Forrent.com

forrent.com/es/sc/charleston/3-bed-2-bath-home-available-october-2025/t134k497msockid=35ab31d3183c6e1c026625e0192a6f39

Map ForRent.com Charleston, SC

English Advertise your rental

COMING SOON

2 Photos

\$5,276 /Month

181 Gordon St, Charleston, SC 29403

last update: 1 day ago

Add a commute

Contact the agent (854) 20...

Request

Send Message

9:50:26 AM
Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 74°F

Set up your calendars to see where you need to be

Get started

Sep 27

World Tourism Day
Discover New Horizons!

Sep 29

Showmojo.com

showmojo.com/l/e219ec1035/181-gordon-st-charleston-sc-29403?fullscreen=true&g=2

Meridian Residential Group

Pet / Animal Application All Listings

OWN ACRES
Charleston Tourist
Stoney Field

There are currently no showtimes available to see this home. Please fill out our pre-showing questionnaire and we'll contact you as soon as there are times available.

181 Gordon St

181 Gordon St
Charleston, SC 29403

Apply Now

9:47:13 AM
Friday, September 26

September 2025

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

Today 87°F / 74°F

Set up your calendars to see where you need to be

Get started

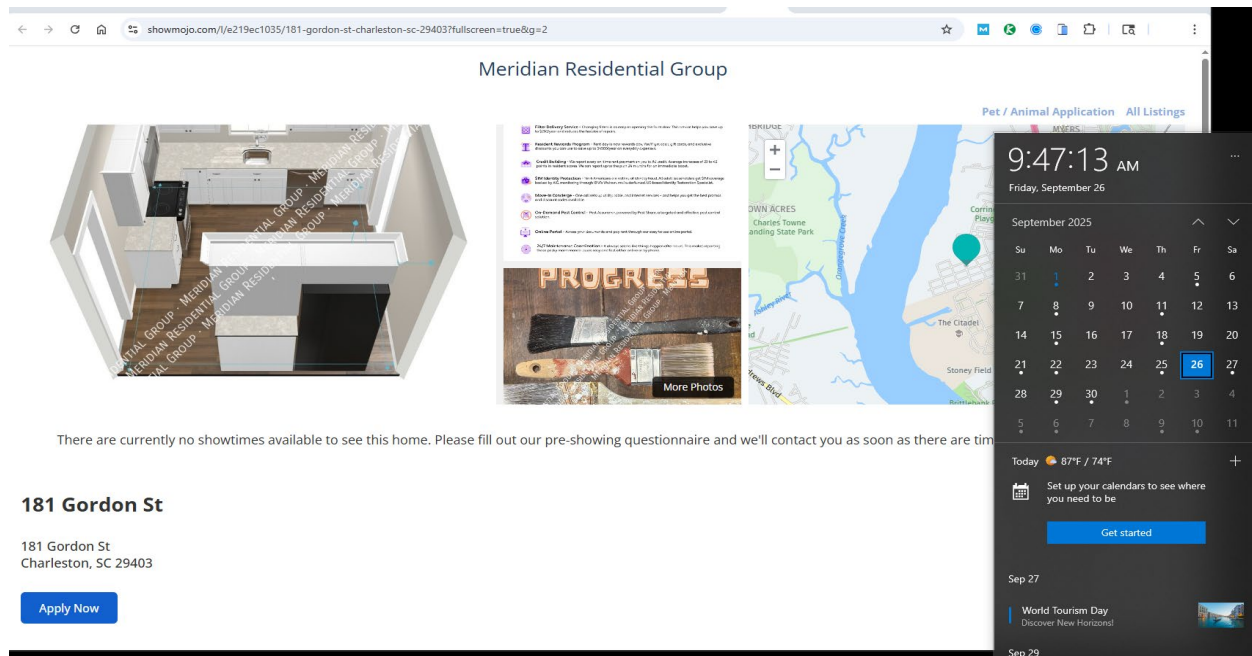
Sep 27

World Tourism Day
Discover New Horizons!

Sep 29

For the sake of brevity, not including all sites or all screenshots in exhibit

Matterport (virtual tour removed)



15 Sites found with the 181 Gordon St. ad as of October 5, 2025

+ 1 Virtual Tour (Matterport) = **16 sites so-far identified***

***And there are likely more, given AppFolio/ShowMojo syndication fingerprints and ShowMojo's claim of distribution over 50+ sites**

Sites identified with ~16 still images (with Meaghan, belongings, bathroom, bedroom) or identified with replacement ad after original ad removal

zillow, trulia, realtor.com, apartments.com, apartmentfinder.com, forrent.com, rent.com, clemsonoffcampus.com, PadMapper, Zumper, meridianresidentialgroup.com, showmetherent.com, HotPads.com, RentalSource.com, Showmojo.com

Matterport Virtual Tour (with Chris, Rocket in diapers, Thaut Thought Leadership sign)

Matterport

& everywhere the virtual tour was embedded or downloaded