

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

)) IN THE COURT OF COMMON
Plaintiffs,) PLEAS
) NINTH JUDICIAL CIRCUIT
) Civil Action No. 2025-CP-10-05095
)
) PLAINTIFFS' SUPPLEMENTAL
) MOTION FOR ADA
) ACCOMMODATION
) (REMOTE FILING
) AND APPEARANCES)
)
Defendants.)
)

2026 JAN 30 PM 4:31
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

INTRODUCTION

Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer respectfully submit this limited supplemental motion to request reasonable accommodations under Title II of the Americans with Disabilities Act ("ADA") in connection with filing and appearances, in light of the documented PTSD crisis and functional limitations described in Plaintiffs' Emergency Motion for Short Health-Based Protective Relief and to Maintain Assignment with Judge Rode, filed January 28, 2026.

As set forth in that Emergency Motion, Mr. McNeil currently tests in the severe range on a validated PTSD self-report instrument (PCL-5 score 76/80), with contemporaneously documented collapse in sleep, work, physical safety, and related functioning that correlates with defense-driven gaslighting and mischaracterization of his conduct in this litigation. This is correlated by the Affidavit of Meaghan Poyer [Exhibit E]

In an email to court staff on January 27, 2026, Plaintiffs advised that, "because pro se litigants in Charleston County cannot e-file, and given my current medical vulnerability ... I am not able to safely reach the courthouse before closing today," and that Plaintiffs intended to hand-file the Emergency Motion when co-Plaintiff Poyer could physically do so.

That barrier persists. Unlike represented parties, who may file virtually and instantaneously, Plaintiffs as pro se litigants must physically drive, park, and hand-file downtown to preserve

their rights - something Mr. McNeil is not medically safe to do at present, and that Ms. Poyer can only sporadically accomplish around her own work obligations.

Title II of the ADA and its implementing regulations require courts, as public entities, to make reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination on the basis of disability, unless doing so would fundamentally alter the nature of the service, program, or activity.

Clarification of “gaslighting” as used in this motion

When Plaintiffs use the term “gaslighting” in connection with this case, they are not using it as a casual insult or political buzzword. Rather, they are using it in the sense described in contemporary trauma and institutional-betrayal literature: a sustained pattern of denying, minimizing, or distorting documented traumatic events by those in positions of power over the victim, in ways that predictably compound post-traumatic stress and undermine the victim’s ability to trust their own perceptions.

In Mr. McNeil’s situation, this includes repeated litigation conduct and communications that proceed as if undisputed events (such as the publication and syndication of interior images of Plaintiffs’ home and the existence of a falsified “postmark” document) simply never occurred, coupled with reframing his safety-motivated complaints and preservation notices as “threats,” despite contemporaneous documentation and a pending criminal and regulatory investigation.

This pattern has continued in the January 27–28, 2026 email chain with court staff, where defense counsel denied and inverted my safety-motivated report as “threats” and positioned themselves as the primary victims in front of the Court (a classic DARVO - deny, attack, reverse victim and offender - response pattern), even after being expressly informed of my severe PTSD and gaslighting-severity scores. [Exhibit D: Misrepresentation to court staff emails.]

Mr. McNeil has attempted to document the impact of this pattern using validated self-report tools, including the PTSD Checklist for DSM-5 (PCL-5), on which he scored 76 out of 80 (severe range), and a structured gaslighting-severity instrument scoring 79 out of 80, reflecting an extreme level of coordinated psychological harm.

In this motion, therefore, **“gaslighting” refers to a clinically significant, compounded trauma pattern that substantially limits major life activities (including sleep, concentration, working, and interacting with others) and materially drives the need for ADA accommodations**, not merely to sharp language or ordinary litigation disagreement.

REQUESTED ADA ACCOMMODATIONS

In light of the severe PTSD-related symptoms and functional limitations described above—which substantially limit Mr. McNeil’s major life activities, including sleep, concentration, safe driving, and his ability to manage in-person court obligations, and which are currently

documented through validated self-report instruments (including a PCL-5 score of 76/80 in the severe range) and contemporaneous written records - Plaintiffs respectfully request the following reasonable modifications to court procedures under Title II of the ADA, so that Mr. McNeil can meaningfully access and participate in this litigation while he seeks formal medical evaluation.

e-filing access

Co-Plaintiff Meaghan Poyer is not disabled, but as a full-time employee she is only intermittently able to leave work during courthouse business hours, and cannot reliably serve as the sole physical conduit for preserving both Plaintiffs' rights through hand-filings.

1. Electronic Filing Access for Disabled Plaintiff (and Joint Use by Co-Plaintiff). That, as a reasonable modification of current procedures under Title II of the ADA, the Court authorize Plaintiff James C. McNeil, as a pro se litigant experiencing severe PTSD-related limitations that he reasonably believes qualify as a disability under the ADA, to register for and use the Court's existing electronic filing system in this case, so that he can file pleadings, motions, and exhibits, and receive notices and orders electronically. Because Mr. McNeil and Ms. Poyer are joint pro se plaintiffs who ordinarily file and sign pleadings together, Plaintiffs further request that these electronic-filing credentials be available for use in connection with filings made in both Plaintiffs' names, rather than requiring separate, repeated physical trips by Ms. Poyer solely to compensate for Mr. McNeil's disability-related limitations.
2. Alternative Only if Full E-Filing Access Is Denied (Email Treated as Filed Upon Receipt). If, and only if, the Court determines that granting full electronic-filing credentials to a pro se litigant is not feasible in this forum, Plaintiffs request, as a functionally equivalent accommodation, an order providing that:
 - a) PDFs of signed pleadings, motions, and exhibits sent from Mr. McNeil's email address to a designated Clerk of Court email address in this case will be deemed filed as of the timestamp of receipt shown on the Clerk's server; and
 - b) The Clerk will promptly docket those filings in the case management system and return a clock-stamped PDF confirmation to Plaintiffs by email.

Remote Appearance Option for Non-Evidentiary Hearings.

That, for status conferences and motion hearings that do not involve live witness testimony:

1. Plaintiffs may appear by Zoom or comparable remote video platform if they give at least 24 hours' notice of their intent to do so; and
2. No party shall object to remote appearance solely on the ground that Plaintiffs are pro se or that in-person attendance is customary, where Plaintiffs have documented a PTSD-related functional limitation on in-person confrontation.

Plaintiffs recognize that, under ordinary circumstances, remote appearances are often arranged by stipulation. In this case, however, prior attempts to secure even modest procedural stipulations have been met with hostility.

For example, when Plaintiffs requested a simple stipulation to treat email service as timely if received within 30 days rather than 35, consistent with the Supreme Court's five-day extension for mail, defense counsel refused and insisted on the maximum delay.

[Exhibit A: email from Kevin O'Brien to Court Staff; Exhibit B: Email from Plaintiff McNeil supplying email O'Brien referenced and clarifying no physical threats were made; Exhibit C: January 28 email from Alicia Bolyard joining in "the sentiments and requests from Counsel for SAC 181 and reiterating the "threats.]

Given

- a) that pattern of opposition to reasonable, efficiency-oriented accommodations, and
- b) the time-sensitive nature of the pending LLR PMIC investigation into property manager Tara Bayles (Investigation No. 2025-566) and the February 9, 2026 LLR investigator deposition, which must proceed in advance of the LLR's February 20 statutory deadline,

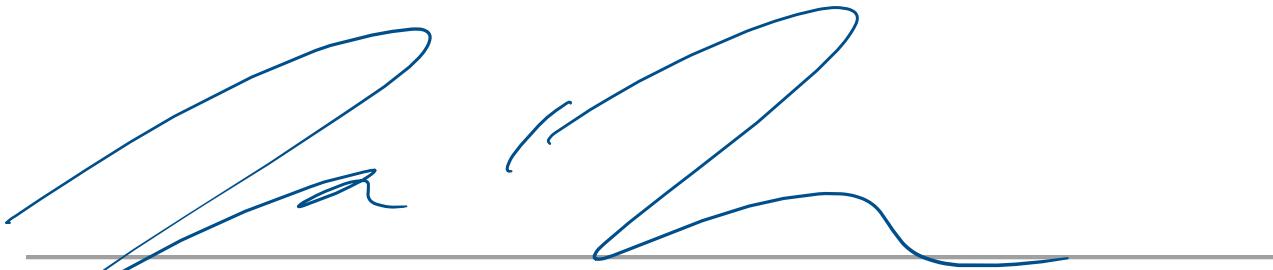
Plaintiffs reasonably concluded that conditioning remote appearance on defense consent would be both futile and prejudicial to their ability to obtain critical regulatory testimony.

Plaintiffs therefore ask the Court to authorize remote participation for them in non-evidentiary hearings as an ADA accommodation and case-management measure, with any party remaining free to appear in person if they wish, and with any objections by defendants required to be raised by motion showing specific, case-specific good cause rather than by withholding consent

These modest accommodations would eliminate the most immediate ADA-related barriers - unsafe driving and manual filing requirements - without altering deadlines, vacating already-scheduled depositions, or prejudicing any party. Represented litigants already enjoy these accommodations or their functional equivalents via e-filing and remote conferencing; extending analogous options to disabled pro se litigants is a reasonable, narrowly tailored modification.

Plaintiffs remain committed to moving this case forward and will, as noted in their Emergency Motion, promptly notify the Court after Mr. McNeil's urgent medical assessment whether his condition has stabilized or further accommodations or co-counsel association will be required.

Respectfully submitted this 30th day of January, 2026.

Two handwritten signatures in blue ink. The signature on the left is for James C. ("Chris") McNeil, Pro Se, and the signature on the right is for Meaghan Poyer. Both signatures are written in a cursive style and are placed above a horizontal line.

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

A handwritten signature in blue ink that reads "Meaghan Poyer". It is written in a flowing, cursive script and is positioned above a horizontal line.

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

**EXHIBIT A: Email from Pro Se Plaintiff
McNeil requesting 30 day stipulation.**

From: chris.thaut.io
To: [Justine Tate \(5311\)](mailto:Justine.Tate@rlattorneys.com); [Alicia Bolyard](mailto:Alicia.Bolyard@rlattorneys.com); [Kevin O'Brien \(5302\)](mailto:Kevin.O'Brien@rlattorneys.com); [C&M McNeil](mailto:C&M.McNeil@rlattorneys.com); cmanning@rlattorneys.com
Cc: [Kelsi Sigler](mailto:Kelsi.Sigler@rlattorneys.com); [Kaylie Stapleton](mailto:Kaylie.Stapleton@rlattorneys.com)
Subject: RE: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)
Date: Monday, November 3, 2025 2:24:00 PM

Ms. Tate (and counsel),

Thank you for your clarification on the Rule 6(e) add-on for email service. To keep this case efficient and avoid unnecessary delay or cost for any party, please confirm by 5:00 p.m. ET today (Mon., Nov. 3, 2025) which of the following you prefer for all post-appearance discovery and other served papers going forward:

Option A — Stipulation (preferred):

By stipulation under Rule 29, SCRCP, service by e-mail will run on a 30-day clock with no additional five (5) days under Rule 6(e). This preserves a predictable schedule without duplicative paper workflows on our side or scanning burden/cost on yours.

Option B — Hand Delivery:

If you prefer not to stipulate, we will serve time-sensitive papers by hand delivery to counsel's office under Rule 5(b)(1). We will not also email a pdf but will email a one-page courtesy Proof of Service noting date/time, office address, and recipient. We understand this may require your team to scan the papers to work with them electronically and may increase your clients' administrative costs and staff time, hence the stipulation offer.

For convenience, here is the stipulation text (a simple "Agreed" reply from each counsel suffices):

Stipulation Regarding Email Service Time Computation (SCRCP 29)

The parties stipulate that, for all discovery papers and other documents served after appearance (excluding initial service of process and any document the rules or a court order require to be served otherwise), service by email shall be treated as delivery for time-computation purposes under Rule 6(a), SCRCP, and the additional five (5) days in Rule 6(e) shall not apply. This stipulation does not alter any court-ordered deadlines and may be terminated on seven (7) days' written notice.

If we do not receive written stipulation adopting Option A by 5:00 p.m. ET today, we will proceed with Option B for future time-sensitive service.

Respectfully,

Chris McNeil

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

From: Justine Tate (5311) <Justine.Tate@phelps.com>
Sent: Monday, November 3, 2025 11:55 AM
To: chris thaut.io <chris@thaut.io>; Alicia Bolyard <abolyard@rlattorneys.com>; Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; C&M McNeil <mcneilandpoyer@gmail.com>
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>
Subject: RE: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

Hi Chris, Meaghan,

Pursuant to the Supreme Court's May 6, 2022 Order RE: Service by E-Mail in the Trial Courts and SCRCMP 5, service via email is treated as service via mail in that 5 days are added to the computation of time. Thus, the time for the parties to respond to Plaintiffs' written discovery requests served via email is 35 days (not 30 days, as noted below).

Thanks,
Justine

Justine M. Tate
Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5311
Fax: 919-789-5301
Email: justine.tate@phelps.com
Please note our recent change of address.

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From: chris thaut.io <chris@thaut.io>
Sent: Friday, October 31, 2025 6:06 PM
To: Justine Tate (5311) <Justine.Tate@phelps.com>; Alicia Bolyard <abolyard@rlattorneys.com>; Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; C&M McNeil <mcneilandoyer@gmail.com>
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>
Subject: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

Counsel,

Pursuant to **Rule 36, SCRCP**, and by **email service consent under Rule 5(b)(1), SCRCP**, please find attached Plaintiffs' Requests for Admission directed to the defendants identified below.

Attachments (4):

- **Plaintiffs' First Requests for Admission to SAC 181, LLC (PDF)**
- **Plaintiffs' First Requests for Admission to Meridian Residential Group, LLC (PDF)**
- **Plaintiffs' First Requests for Admission to Tara Bayles (Individually) (PDF)**
- **Plaintiffs' First Requests for Admission to Adam Bayles (Individually) (PDF)**

Each set contains standard **Instructions & Definitions** and is limited to narrowly tailored RFAs to streamline issues (consent/controls, syndication/takedowns, knowledge/ratification, and renovation assertions).

Response deadline: absent stipulation or court order to the contrary, responses are due **30 days from today** under Rule 36(a), SCRCP.

Respectfully,

Chris McNeil

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

**EXHIBIT B: Response to stipulation request
from SAC 181, LLC Counsel Kevin O'Brien**

From: [Kevin O'Brien \(5302\)](#)
To: [chris thaut.io](#); [Justine Tate \(5311\)](#); [Alicia Bolyard](#); [C&M McNeil](#); [cmanning@rlattorneys.com](#)
Cc: [Kelsi Sigler](#); [Kaylie Stapleton](#)
Subject: RE: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)
Date: Monday, November 3, 2025 2:32:58 PM

Mr. McNeil:

As counsel for SAC 181, we are not going to re-write the South Carolina Rules of Civil Procedure and we will not be stipulating to change them. We will follow the rules on service.

You can choose to serve documents in any way allowed by the Rules that you see fit. But, the timing as set forth by the Rules will apply.

Sincerely,

Kevin M. O'Brien

* Admitted in NC, SC, and FL*

Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5302
Fax: 919-789-5301
Email: kevin.o'brien@phelps.com

Please note our recent change of address.

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From: chris thaut.io <chris@thaut.io>
Sent: Monday, November 3, 2025 2:25 PM
To: Justine Tate (5311) <Justine.Tate@phelps.com>; Alicia Bolyard <abolyard@rlattorneys.com>; Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; C&M McNeil <mcneilandpoyer@gmail.com>; cmanning@rlattorneys.com
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>

Subject: RE: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

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Option B — Hand Delivery:

If you prefer not to stipulate, we will serve time-sensitive papers by hand delivery to counsel's office under Rule 5(b)(1). We will not also email a pdf but will email a one-page courtesy Proof of Service noting date/time, office address, and recipient. We understand this may require your team to scan the papers to work with them electronically and may increase your clients' administrative costs and staff time, hence the stipulation offer.

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If we do not receive written stipulation adopting Option A by 5:00 p.m. ET today, we will proceed with Option B for future time-sensitive service.

Respectfully,

Chris McNeil

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

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Sent: Monday, November 3, 2025 11:55 AM
To: chris thaut.io <chris@thaut.io>; Alicia Bolyard <abolyard@rlattorneys.com>; Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; C&M McNeil <mcneilandpoyer@gmail.com>
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>
Subject: RE: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

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Thanks,
Justine

Justine M. Tate
Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5311
Fax: 919-789-5301
Email: justine.tate@phelps.com
Please note our recent change of address.

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From: chris thaut.io <chris@thaut.io>
Sent: Friday, October 31, 2025 6:06 PM
To: Justine Tate (5311) <Justine.Tate@phelps.com>; Alicia Bolyard <abolyard@rlattorneys.com>; Kevin O'Brien (5302) <Kevin.O'Brien@phelps.com>; C&M McNeil <mcneilandoyer@gmail.com>
Cc: Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>
Subject: Service: Plaintiffs' First Requests for Admission to SAC 181, Meridian, Tara Bayles, and Adam Bayles — McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

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- **Plaintiffs' First Requests for Admission to Adam Bayles (Individually) (PDF)**

Each set contains standard **Instructions & Definitions** and is limited to narrowly tailored RFAs to streamline issues (consent/controls, syndication/takedowns, knowledge/ratification, and renovation assertions).

Response deadline: absent stipulation or court order to the contrary, responses are due **30 days from today** under Rule 36(a), SCRCRCP.

Respectfully,

Chris McNeil

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

**EXHIBIT C: Response to stipulation request
from Meridian, Adam Bayles, and Tara Bayles
Counsel Alicia Bolyard**

From: [Alicia Bolyard](#)
To: [Justine Tate \(5311\)](#); [Kevin O'Brien \(5302\)](#); [chris thaut.io](#); [C&M McNeil](#); [Chris Manning](#)
Cc: [Kelsi Sigler](#); [Kaylie Stapleton](#)
Subject: RE: Voicemail Regarding McNeil & Poyer v. SAC 181, LLC et al. (Case No. 2025-CP-10-05095)
Date: Monday, November 3, 2025 4:38:52 PM
Attachments: [image001.png](#)

Good afternoon Mr. McNeil,

Please consider this message as Meridian Residential and Mr. and Mrs. Bayles joinder in the arguments and issues addressed below by counsel for SAC 181, LLC in its entirety. We do not agree to any proposed stipulation changing what is set out in South Carolina Rules of Civil Procedure and the Supreme Court's May 6, 2022 Order RE: Service by E-Mail in the Trial Courts. Please provide a copy of any discovery requests you purport were provided to Mr. Pettis with regards to my clients at your earliest convenience. Please feel free to reach out to me to discuss further.

Kindest regards,

Alicia N. Bolyard
Resnick & Louis, P.C.
Partner- Admitted in WV and SC
146 Fairchild St., Suite 130
Charleston, SC 29492
abolyard@rlattorneys.com
Phone (843) 410-2534



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

Hi Mr. McNeil,

We respond to your note below as follows.

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

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

for Admission), should you elect to do so.

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

1. We would caution the continued and purported use of SCRCR Rule 11 allegations in motions and pleadings when it is not a rule that you understand and has very particular consequences.
2. We caution you and Ms. Poyer labeling filed motions as “emergency” motions. We are confident that the Court does not view your motions as an “emergency.” This is a very specific designation saved for unique and particular circumstances, including grave risk to life and limb. That is not the case here. We are certain that a Court not only would agree with us, but also does not take kindly to such an overuse of this designation.
Please consider this our good faith conference on the issue. We request that you withdraw all alleged motions that have been labeled as “emergency.” If you choose not to do so, and we reserve all rights to seek appropriate recourse (or the Court may act on its own).
3. We are not prepared to discuss any potential settlements at the policy limits or above those limits for many reasons, but, namely, there is absolutely nothing to suggest that pro se plaintiffs’ claims are valued anywhere near the policy limits in this case, irrespective of any purported “jury risk analysis” you may have presented. We do not agree with this analysis, nor have we seen any such analysis in our legal research. In that regard, please understand that some of the documents you have had created (we expect from AI) and some of the jargon you are using thinking that it is common amongst lawyers in the area are not actually documents and/or jargon used.
4. In that at regard, we caution that AI generated documents and any attempted use of AI generated information or legal analysis or use of verbiage in the legal profession are not always correct/accurate. Thus, we further caution your and Ms. Poyer’s use of AI generated information in papers filed with the Court. We also encourage you to research what has happened to lawyers in this profession who have used AI generated

research and information in their filings and the ramifications the Court has imposed as a result. We intend to ask the Court to require certifications regarding any use by anyone in this case of AI for anything filed with the Court or served under the Rules of Civil Procedure.

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

Thanks,
Justine

Justine M. Tate

Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5311
Fax: 919-789-5301
Email: justine.tate@phelps.com

Please note our recent change of address.

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

Mr. O'Brien,

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

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

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

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

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

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

Respectfully,

Chris McNeil

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

EXHIBIT D: Counsel Misrepresentation to Court Staff Emails

Following is the email chain where SAC 181 Counsel O'Brien misrepresented Plaintiff McNeil's stance to court staff, apparently thinking Plaintiff McNeil protected the email he sent with Rule 408.

Plaintiff McNeil's response to Counsel O'Brien's allegations is above Counsel O'Brien's email.

From: chris.thaut.io
To: [Kevin O'Brien](mailto:Kevin.O'Brien@sccourts.org); [Joy Johnson](mailto:Joy.Johnson@sccourts.org); dvanslambrooksc@sccourts.org; dvanslmbrooklc@sccourts.org
Cc: [Justine Tate](mailto:Justine.Tate@sccourts.org); [Debra Rizzi](mailto:Debra.Rizzi@sccourts.org); [C&M McNeil](mailto:C&M.McNeil@sccourts.org); [Alicia Bolyard](mailto:Alicia.Bolyard@sccourts.org); [Chris Manning](mailto:Chris.Manning@sccourts.org); [Kelsi Sigler](mailto:Kelsi.Sigler@sccourts.org); [Kaylie Stapleton](mailto:Kaylie.Stapleton@sccourts.org); jeff@jwklegal.com; [Jeffrey Kuykendall](mailto:Jeffrey.Kuykendall@sccourts.org)
Subject: RE: 2025CP1005095 - James C Mcneil , plaintiff, et al VS SAC 181 Llc , defendant, et al - Request for Emergency Status Conference
Date: Tuesday, January 27, 2026 4:45:00 PM
Attachments: [Courtesy Notice – Criminal Investigation & Counsel Conflicts.pdf](#)

Dear Ms. Johnson, Judge Van Slambrook's chambers, and counsel:

I write briefly to respond to Mr. O'Brien's email below and his request for an emergency status conference.

Assignment / which judge should hear this

My understanding is that the pending motions in this civil case (including those originally set for hearing on December 19, 2025) are assigned to Judge Thomas J. Rode, and that Judge McCoy granted the continuance of that roster date when defense counsel reported unavailability.

Out of respect for that prior assignment and for judicial economy, my wife and I believe any consolidated status conference and motion hearing in 2025-CP-10-05095 should remain with Judge Rode, unless the Chief Judge for Administrative Purposes orders otherwise.

We do not object to a brief status conference being set; we simply ask that it be coordinated through the existing assignment so that the judge already familiar with the record, chronology, and discovery disputes can address them holistically.

Joinder in a status conference and notice of forthcoming filing

As pro se plaintiffs, we support a status conference to address the cluster of pending motions (SAC 181's motions to dismiss, for sanctions, for a stay of discovery, and to quash non-party subpoenas, as well as our own opposition and cross-motions). Clear case-management guidance from the Court will help all parties and reduce unnecessary motion practice.

Because pro se litigants in Charleston County cannot e-file, and given my current medical vulnerability (severe PTSD symptoms so far documented on two validated self-report instruments (including a PCL-5 score of 76/80, in the severe range)), I am not able to safely reach the courthouse before closing today.

I intend to hand-file tomorrow a short written response and/or motion (likely a Rule 26(c) protective-order motion addressing counsel conduct and discovery obstruction) and will provide courtesy copies to all parties.

Clarification of the January 26 email Mr. O'Brien characterizes as "threats"

For the Court's convenience, I am attaching the January 26, 2026 email that Mr. O'Brien references, titled "Courtesy Notice – Criminal Investigation & Counsel Conflicts." I respectfully ask that the Court and staff review the actual text rather than rely solely on opposing counsel's description. In that email, I did three things:

- Gave notice that I had initiated a criminal investigation with the Charleston County Sheriff's Office (Case No. 2026-001263), with primary focus on property manager Tara

R. Bayles and evidence already described in this Court's record (allegedly falsified "postmark" document, 21-platform image syndication, and interference with LLR Investigation #2025-566).

- Issued evidence-preservation cautions (forensic recoverability, crime-fraud exception, and spoliation/adverse inferences) grounded in standard litigation practice when potential criminal and Bar issues arise from the same underlying facts.
- Disclosed that I am now testing in the severe PTSD range (PCL-5 score 76/80) and experiencing extreme gaslighting-type harm from a months-long pattern of conduct by property managers, insurers, and defense counsel, while still inviting the Altman principals to read the filings themselves and consider a more responsible resolution path.

I should note that when I use the term "gaslighting" in this context, I am not speaking loosely or rhetorically. I mean a sustained pattern, across multiple firms and attorneys, of acting as if the core traumatic events in this case simply did not occur, despite incontrovertible record evidence. It is not that they are disputing our documented evidence. They are not even acknowledging its existence.

A specific example is repeatedly refusing even to acknowledge the undisputed publication and mass syndication of private interior images of our home, including those of plaintiffs and the indignity of their old dog in diapers, which is documented in exhibits to the Motion for Leave to File the Second Amended Complaint and related filings.

Each time defense counsel writes and argues as though these events are imaginary or legally insignificant, it compounds the harm by invalidating lived trauma, forcing me to relive it and to keep proving that what happened to us really happened. I am contemporaneously documenting these instances for the Court so that "gaslighting" here refers to a specific, evidence-tied litigation pattern, not a casual insult.

On the email Mr. O'Brien referenced:

At no point did I threaten physical harm to any lawyer or to anyone's family. The only reference to "families" was a suggestion that counsel consider speaking with their families before deciding whether to remain in a matter that may generate criminal and Bar exposure - essentially encouraging sober reflection, not issuing a threat.

To the extent criminal exposure could eventually touch any attorney, that will be the independent decision of law enforcement and prosecutors. When I met with the deputy, I initially focused the complaint on Ms. Bayles, but I was specifically asked which lawyers and firms were involved with the disputed evidence and regulatory interference. I answered those questions and provided a summary document, and from that point part of this process has been out of my hands.

Gaslighting and need for Court oversight

From my perspective, Mr. O'Brien's framing of that courtesy notice as "threats against lawyers" because I mentioned possible criminal and Bar consequences is another example of

the pattern I described: legitimate pursuit of civil, criminal, and regulatory remedies repeatedly being reframed as misconduct by the person raising them.

I am not in a psychological position where I can continue to absorb that kind of mischaracterization without serious health consequences; the PCL-5 score of 76/80 was not hypothetical, it reflects my lived reality in this case. At the same time, I remain committed to proceeding within the rules, preserving evidence, and giving the Court a clear record. That is why I am not risking a rushed in-person filing before 5:00 PM and will instead file tomorrow, rested and careful.

Next steps

I consent to and welcome a status conference at the Court's convenience, preferably before Judge Rode consistent with the existing assignment, whether in person or via Zoom.

Tomorrow I will hand-file a short written motion/response addressing (a) the pattern of mischaracterization and lawfare, and (b) appropriate protective conditions on counsel communications and motion practice going forward. Thank you for your time and for allowing me to clarify my position without compromising my health by racing downtown this afternoon.

Respectfully,

Chris McNeil

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

From: Kevin O'Brien <Kevin.O'Brien@phelps.com>
Sent: Tuesday, January 27, 2026 3:01 PM
To: Joy Johnson <JSJohnson@charlestoncounty.org>; dvanslambrooksc@sccourts.org; dvanslmbrooklc@scourts.org
Cc: Justine Tate <Justine.Tate@phelps.com>; Debra Rizzi <Debra.Rizzi@phelps.com>; chris thaut.io <chris@thaut.io>; C&M McNeil <mcneilandpoyer@gmail.com>; Alicia Bolyard <abolyard@rlattorneys.com>; Chris Manning <cmanning@rlattorneys.com>; Kelsi Sigler <ksigler@rlattorneys.com>; Kaylie Stapleton <kstapleton@rlattorneys.com>; jeff@jwklegal.com; Jeffrey Kuykendall <JWKuykendall@jwklegal.com>
Subject: 2025CP1005095 - James C Mcneil , plaintiff, et al VS SAC 181 Llc , defendant, et al - Request for Emergency Status Conference
Importance: High

Ms. Johnson, Ms. Atkins, and Mr. Crump:

Justine Tate and I and our law firm of Phelps Dunbar, LLP are counsel for Defendant SAC 181, LLC in the above-referenced matter.

We are writing to request an emergency status conference with Judge Van Slambrook. There are many motions pending before the Court. However, the *pro se* Plaintiffs in this case have recently been taking action and/or sending correspondence, about which we respectfully submit should be brought to the attention of Court and about which we respectfully and humbly request the Court's intervention. Last night *pro se* Plaintiff, James C. ("Chris") McNeil sent an e-mail making threats against lawyers in this case (which we understand to include Ms. Tate and myself) including that he intended to seek criminal charges and he mentioned our families in the e-mail. (We would be happy to share the e-mail with the Court upon Judge Van Slambrook's request.) Plaintiffs have also been sending to non-parties documents Plaintiffs are purporting to be subpoenas, but which documents were not issued or signed by the Clerk. We have recently filed Motions to Quash two such purported subpoenas to non-parties.

We are requesting a short emergency status conference with the Court in the near future, which we would be happy to have virtually, to seek some potential case management rules for this case, including a possible stay of further activity to maintain the status quo until the Court has time to hear many of the pending motions.

Several motions in this case had originally been set for hearing for a Motions Roster on December 19, 2025, but we needed to seek a continuance because both counsel for SAC 181 were unavailable on that date. The Motion for Continuance was granted by Judge McCoy. We are awaiting notice of the resetting of the hearings of those motions. However, there have been several other motions filed in this case subsequent to the first batch of motions originally being set for hearing.

While we expect all parties would appreciate the clarity that would be provided by obtaining rulings on all of the pending motions, a few that would really help frame what, if any claims in this case will be able to proceed, and issues on the timing and scope of any discovery would be (1) SAC 181's Motion for Sanctions (seeking dismissal), (2) SAC 181's Motion for a Protective Order Including a Stay of Discovery (requesting a stay of all discovery until after our Motion to Dismiss is resolved and the pleadings are finally framed), and (3) the related Motion to Dismiss.

We understand that there is a possibility that many or all of the motions in this case may possibly get set for a Motions Roster the week of February 23, 2026. We would look forward to same.

However, in the interim, we would respectfully request a short emergency status conference with the Court regarding any further actions or correspondence regarding this lawsuit pending all of the other motions being heard. Naturally, if the Court would also have any time slots in the near future that opened up wherein some of the more pressing motions could be heard, we would certainly welcome the opportunity and believe that the other parties would as well.

We look forward to the Court's further instructions and guidance in this regard. If Judge Van Slambrook needs or wants us to file a formal Motion for a Status Conference, please

let us know and we would be happy to do so. If Judge Van Slambrook needs or wants any other documents or information from us at this time, please let us know.

We thank all of you and Judge Van Slambrook in advance for all of your time and consideration.

Pro se Plaintiffs and counsel for all other parties are copied on this e-mail.

Respectfully Submitted,

Kevin M. O'Brien

* Admitted in NC, SC, and FL*

Phelps Dunbar LLP
4300 Edwards Mill Road
Suite 600
Raleigh, NC 27612
Direct: 919-789-5302
Fax: 919-789-5301
Email: kevin.o'brien@phelps.com

Please note our recent change of address.

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Following is the full text of Mr. McNeil's January 26, 2026 email that defense counsel later described to the Court as "threats" to lawyers and their families. As the text reflects, the only reference to "families" appears in the context of urging counsel to consult their families before deciding whether to remain in a matter that may generate criminal and Bar exposure; there is no threat of physical harm.

From: chris.thaut.io
To: ["caltman@caltmanlaw.com"](mailto:caltman@caltmanlaw.com); ["jaltman@derfneraltman.com"](mailto:jaltman@derfneraltman.com)
Cc: ["Kevin O'Brien"](mailto:Kevin.O'Brien@outlook.com); ["Justine Tate"](mailto:Justine.Tate@outlook.com); ["Alicia Bolyard"](mailto:Alicia.Bolyard@outlook.com); ["gladys.lambert@ipgclaims.com"](mailto:gladys.lambert@ipgclaims.com); ["C&M McNeil"](mailto:C&M.McNeil@outlook.com)
Subject: Courtesy Notice – Criminal Investigation & Counsel Conflicts
Date: Monday, January 26, 2026 5:56:00 PM
Importance: High

Mr. Altman, Mr. Altman, Counsel, and Ms. Lambert,
I am sending this as a courtesy notice because I still choose to act from principles of fairness and transparency, even where your conduct toward me has not done the same. Some of you will shortly need a new property manager, and this notice may help you avoid some avoidable crises.

I understand what has been going on. I have personal experience with what is called “narcissistic systems and what you are operating in has all the usual fingerprints: a central actor cannot operate at scale without enablers and a smear campaign that mischaracterizes the target and reframes legitimate boundary-setting as the problem. I have every reason to believe a similar dynamic is in play here: I strongly suspect you have been fed a distorted story about me and about our case posture, because malignant narcissists are skilled con artists and routinely repackage resistance to abuse as “unreasonable” or “unstable” behavior in the victim.

That said, Joathan and Charles - you are experienced lawyers with access to the full record, and you do not have to rely on anyone’s narrative; you can read what is actually on the docket, see the falsified documents, the undisputed privacy violations, and the escalating lawfare for yourselves, and once you do, the evidence and harassment pattern - including in your own defense filings - are, in my view, incontrovertible.

I’ve long wondered why you are letting this happen on your watch. This is at criminal levels, I am suffering from it, enough is enough, and here is what I am doing about it:

Criminal investigation and coordinated campaign

Today I initiated a criminal investigation with the Charleston County Sheriff’s Office, Case No. 2026-001263, with primary focus on **Tara R. Bayles (Meridian Residential Group, PMIC #30129)** and related conduct arising from the 181 Gordon Street matter.

The evidence provided includes the falsified USPS “postmark” (forensic metadata showing a September 5 creation date for a document represented as August 28), 21-platform image syndication records, cross-firm coordination emails, and timing analysis of interference with LLR Investigation #2025-566.

From my perspective, the Altman family has funded and continued to rely on a litigation and insurance machine that has systematically gaslit me about traumatic events (illegal eviction, document fraud, privacy violations), turning what began as a solvable dispute into a coordinated harassment and likely smear campaign instead of a good-faith effort to resolve the case.

Counsel – if you recuse yourself from the case, I will consider not filing charges on you.

Before you let your ego make that decision for you, I suggest discussions with your families. And if you've been seeking a way to disentangle from Tara, here is your opportunity: the perfect excuse.

Clinical harm and urgency (PTSD 76/80)

I have now completed validated clinical assessments, including the DSM-5 PTSD Checklist (PCL-5), on which I scored **76/80**, well into the severe PTSD range. That score documents trauma-level, permanent changes from coordinated gaslighting, pretending the majority of traumatic events associated with this case did not happen, while simultaneously escalating the pressure and refusing to engage in good-faith settlement discussions.

A separate, research-based gaslighting framework places my experience at **79/80 (extreme range)**, reflecting coordinated psychological warfare by multiple actors: property management, defense counsel, and insurance, with all acting in concert over months. This is not abstract language; it describes the clinical reality I am now living with as a direct result of the system the Altmans have financed and have allowed to continue by willing agents of wrongdoing. You have escalated exposure for your client, the Altmans, as well.

Evidence preservation

You are hereby instructed to preserve all communications and documents relating to this matter, including but not limited to emails, texts, internal notes, and messaging with Ms. Bayles, Meridian, IPG, and co-counsel.

These are *my three cautions*:

1. **Forensic recoverability.** Emails, messages, and deleted files can be retrieved from cloud servers and third-party systems by forensic specialists you do not control. Attempted cleanup after this notice is rarely successful and is often obvious in the audit trail.
2. **Crime-fraud and privilege.** Use of legal process as a vehicle for harassment, obstruction, or other criminal conduct pierces the attorney-client privilege; communications furthering that conduct are not protected and may be subject to disclosure in both Bar and criminal proceedings.
3. **Spoliation and adverse inferences.** Any deletion, alteration, or concealment of relevant evidence following this notice will be treated as spoliation and addressed accordingly through adverse inferences, sanctions, and, where appropriate, additional criminal and regulatory referrals.

Charles and Jonathan,

Window for direct contact and open-letter plan

Given

- (a) the documented PTSD-level harm (PCL-5 76/80),
- (b) the extreme gaslighting severity, and
- (c) your continuing refusal to come to the table in good faith,

I will no longer negotiate through counsel who are themselves upcoming subjects of the criminal investigation and potential Bar complaints.

I will be following up with you separately with additional information, because you are the only principals in this group with both the authority and capacity to end this conflict responsibly.

If I do not hear from you directly, or from a new, unencumbered agent acting solely in your interests (not Tara's or conflicted counsel's), by Wednesday at 12:00 PM, I will proceed to publish a **public Open Letter to the Altman Family** on RocketsFight.org.

That letter will outline the clinical findings (including the 76/80 PTSD score), the coordinated gaslighting pattern, the updated damages analysis, your role as enablers of this system, and the path you still have available if you choose to shift from unconscious enablement to conscious stewardship.

If you wish to discuss a path that combines meaningful accountability with systemic course-correction, I am willing to do that directly or through a truly independent representative who is not implicated in the conduct under review. Otherwise, I will continue on the civil, criminal, Bar, and public-accountability tracks already in motion, without further courtesy notice.

Respectfully,

Chris McNeil

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

Following is the email Meridian, Tara Bayles, and Adam Bayles Counsel Bolyard sent January 28, 2026, echoing O'Brien's misrepresentation and demonstrating the pattern Plaintiff McNeil is being targeted with.

From: [Alicia Bolyard](#)
To: [chris thaut.io](#); [Kevin O'Brien](#); [Joy Johnson](#); [dvanslambrooksc@sccourts.org](#); [dvanslmbrooklc@scourts.org](#)
Cc: [Justine Tate](#); [Debra Rizzi](#); [C&M McNeil](#); [Chris Manning](#); [Kelsi Sigler](#); [Kaylie Stapleton](#); [jeff@jwlegal.com](#); [Jeffrey Kuykendall](#)
Subject: RE: 2025CP1005095 - James C Mcneil , plaintiff, et al VS SAC 181 Llc , defendant, et al - Request for Emergency Status Conference
Date: Wednesday, January 28, 2026 8:02:01 AM
Attachments: [image002.png](#)

Good morning all,

I apologize for my delay in responding I was in a full day mediation yesterday. I represent the following in this matter: Defendants Meridian Residential Group, Tara Bayles, and Adam Bayles, individually. I join in the sentiments and request from Counsel for SAC 181 for a short Emergency Status Conference regarding the most recent correspondence from *pro se* Plaintiff Chris McNeil. I would ask that we set the multitude of motions for a later date as some of those are directly against me, as an attorney, and I will need time to fully brief those issues. One of those being the most recent filing by the Plaintiffs, a Motion to Disqualify me as counsel in response to a Motion to Quash I filed due to the Plaintiff sending nonparties documents purporting to be subpoenas, however said documents were not issued or signed by the Clerk. I agree with Counsel for SAC 181 and consider several of Mr. McNeil's most recent communications as threats to my clients and myself, as their attorney.

We look forward to the Court's further instructions and guidance in this regard. If Judge Van Slambrook needs or wants any other documents or information from us at this time, please let us know. We will be happy to provide. We thank you in advance for your time and consideration.

Pro se Plaintiffs and counsel for all other parties are copied on this e-mail.

Kindest regards,

Alicia N. Bolyard
Resnick & Louis, P.C.
Partner- Admitted in WV and SC
146 Fairchild St., Suite 130
Charleston, SC 29492
abolyard@rlattorneys.com
Phone (843) 410-2534



**EXHIBIT E: Affidavit of Meaghan Poyer:
High Cost of Lawfare Part II**

AFFIDAVIT OF MEAGHAN POYER

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

(High Cost of Defendants' Lawfare Tactics Part II)

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

BACKGROUND

1. I am a named Plaintiff in this action (Case No. 2025-CP-10-05095) and the wife of co-Plaintiff James C. ("Chris") McNeil.
2. This Affidavit describes the impacts on our family life, mental and physical wellbeing, and ordinary functioning that have resulted from Defendants' retaliatory eviction and the subsequent defense harassment campaign of the last 3 months, since Phelps Dunbar and Resnick & Louis joined the case.

EFFECTS ON CHRIS'S MENTAL AND PHYSICAL WELLBEING

3. I observe in Chris a state of near-perpetual exhaustion and fatigue. He has had almost no time for his normal personal health practices, including his spiritual practices, physical fitness routines, or musical and artistic pursuits.
4. Chris previously practiced meditation and worked out 3-5 times per week. He has stopped both entirely since the retaliatory eviction.
5. Chris played guitar daily before these events. In the past 4.5 months, I've heard him play only a handful of times (3-4 occasions total). This represents a 99% reduction in an activity that was central to his creative expression and stress relief.
6. Chris produced over 100 episodes of his Thought Leadership Studio podcast over a two-year+ period, never going more than a month without recording. He has halted production entirely since the harassment campaign began.

DISRUPTION OF FAMILY LIFE

7. This ongoing litigation has disrupted our normal routines, especially with our elderly dog and our puppy, and with our time together as a family.
8. Before these events, we regularly enjoyed date nights, movies, and album-listening nights together. Since the retaliatory eviction and escalation of litigation, those shared activities have stopped altogether. There has not been a single instance of any of them in the 6 months since the forced move.

9. Our daily family dog-walking routines have also been disrupted. Many walks are now dominated by conversations and audio recordings of legal activities and ideas that Chris feels compelled to capture and follow up on as soon as we get back home, rather than simply enjoying time outside as a family.

DISRUPTION OF BASIC HOUSEHOLD FUNCTIONING

10. Standard household activities are frequently delayed or disrupted. The fatigue from the unplanned move we were forced into, followed by the pressure of this case, has impacted Chris to the point where basic tasks are forgotten. I have personally witnessed, for example:

- Perishable groceries not being put away promptly because attention is pulled back into legal work
- Forgetting that an app or call "isn't working" because the phone is still connected to Bluetooth headphones
- Trash and recycling not being put out on time because deadlines, filings, or email exchanges have taken over our evenings

11. These are not isolated incidents. They reflect a constant cognitive load and time pressure that leaves little bandwidth for ordinary life.

MY OWN WORKLOAD AND STRAIN

12. In addition to this legal case, I work a full-time job and commute by public transportation into the office.

13. I am currently taking two graduate-level courses, which demand significant reading, assignments, and focus.

14. I also provide physical and mental support to my elder parents: one who does not drive, and the other who is suffering from cancer, has a heart condition requiring surgery, and recently spent 10 days in the hospital. Both continue to require attention and support from me.

15. Against this backdrop, our home interactions are often fraught with tension and curtness, as we are constantly trying to manage this case, meet our obligations, and still create a peaceful home environment. The pressure from Defendants' litigation strategy pushes into every corner of our lives.

LOSS OF PERSONAL ENRICHMENT AND HEALTH PRACTICES

16. My own personal activities have been significantly disrupted. Since the move and the escalation of this litigation, I have had far less time and energy for:
 - Personal enrichment through reading
 - Artistic endeavors, including graphic design and typography
 - Physical fitness, including dance
 - Returning to coaching with a local high school, which I had planned and was looking forward to
 - Cooking and meal/food preparation, including canning and preserving, activities that are both practical and a source of joy for me
 - Returning to volunteering on committees with my parish (church)
17. These are not trivial hobbies; they are core components of how I maintain my mental and physical health, express creativity, and contribute to my community.

INCOMPLETE HOME SETUP AND ENVIRONMENTAL STRESS

18. Because so much time and energy has been consumed by defending against Defendants' filings and motions, we have not had the time to fully settle into our new home.
19. Specifically, we have:
 - Not finished unpacking our house
 - Been unable to undertake the extensive yard work needed to make the outside environment functional and calm
 - Not yet set up proper fencing for our dogs, which would give them a safe outdoor space and give us peace of mind
20. The result is that our home environment continues to feel temporary, unsettled, and constrained - more like a workspace and staging area for litigation than a stable, restorative place to live.

THE SUFFERING OF ROCKET

21. Rocket is our 15-year-old Carolina Dog. Chris and I both love him and enjoy his antics, like always following people to the bathroom to stand guard and tossing our arms with his snout when he wants to go outside.
22. Rocket's vision deteriorated to near blindness. We had set up the Gordon Street house in such a way that it was easy for him to move around the house with confidence and so that we would not have to worry if we had to leave him unattended.
23. We were saving to address his additional dental, vision, and health issues.

24. Shortly after our move, I witnessed the antique couch tossed on its side and learned that Rocket gotten stuck under it for hours whimpering before Chris figured out what that noise was and found him. Chris was beyond upset about this incident.
25. We have still not been able to set up our new household or set standard routines for Rocket due to so much time and energy consumed by defending against Defendants' filings and motions.
26. Nor have we been able to address Rocket's much needed veterinary appointments regarding his alarming eye condition, and delayed dental surgery so he can eat without pain as Chris has had to work on this case instead of meeting with his clients.

ADDITIONAL OBSERVATIONS ABOUT CHRIS'S SACRIFICES

27. In addition to the observations above, I have seen Chris:
 - Stop meditating and working out entirely since the move, despite previously practicing both three to five times per week
 - Reduce his guitar playing from daily to only a handful of times in more than three months
 - Halt production of his Thought Leadership Studio podcast, despite having produced more than 100 episodes over a two-year period and never previously going more than a month without recording
28. I have heard him say that he is intentionally placing accuracy and completeness in court filings above his own business development, client work, and creative projects, because he feels a moral and legal duty to make sure our case is decided on a correct record. This choice has real consequences for our income, his professional relationships, and our long-term plans.

PURPOSE OF THIS AFFIDAVIT

29. The cumulative effect of Defendants' litigation tactics is that our family's mental health, physical routines, household functioning, and financial stability have all been significantly harmed.
30. I submit this Affidavit so the Court and investigating authorities can appreciate that what may, on the surface, appear to be "just another motion" or "ordinary litigation hardball" has, in reality, imposed an ongoing, heavy cost on our daily life, relationships, and wellbeing.
31. I respectfully ask that these impacts be considered when evaluating whether Defendants' tactics reflect proportional, good-faith advocacy, or whether they cross the line into

litigation-as-harassment aimed at grinding down a pro se family rather than resolving the case based on the clear evidence, including what we have already documented.

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

Meaghan Poyer
Meaghan Poyer

Subscribed and sworn to before me this 29th day of January, 2026, by
Meaghan Poyer, who is personally known to me or produced identification.

Deb

Notary Public for South Carolina

My Commission Expires: 10 June 2031

