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| **STATE OF SOUTH CAROLINA** | ) | |
| | ) | **IN THE COURT OF COMMON PLEAS** |
| **COUNTY OF CHARLESTON** | ) | **NINTH JUDICIAL CIRCUIT** |
| | ) | |
| **James C. ("Chris") McNeil and Meaghan Poyer,** | ) | **Civil Action No.: 2025-CP-10-05095** |
| | ) | |
| **Plaintiffs,** | ) | |
| | ) | |
| **v.** | ) | |
| | ) | |
| **SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC,** | ) | |
| | ) | |
| **Defendants.** | ) | |
| _____ | ) | |

2025 SEP 24 PM 3:59
CLERK OF COURT

**EMERGENCY MOTION FOR (1) REDACTION OF PERSONAL IDENTIFIERS AND (2) NOTICE OF POTENTIAL NEED FOR TEMPORARY RESTRAINING ORDER**

**Plaintiffs, pro se, respectfully move this Court for immediate relief as follows:**

**I. Motion for Redaction of Personal Identifiers**

1. Plaintiffs' residential address and personal contact information currently appear on publicly accessible filings in this case.
2. The presence of Plaintiffs' home address in the public docket presents an acute safety risk, as documented in Plaintiffs' Enhanced Jury Risk Analysis (V3) and supported by prior restraining orders issued against a family member in Charleston County Magistrate Court.
3. Under Rule 5.2 and Rule 41.2, SCRCP, this Court has authority to order redaction of sensitive identifiers from public filings.
4. Plaintiffs request immediate redaction of their residence address and substitution of the following service address:

**James C. McNeil & Meaghan Poyer**
**P.O. Box 30386**
**Charleston, SC 29417**

5. Plaintiffs make this request in good faith to protect personal safety while ensuring a reliable and permanent address for service and communications.

**II. Notice of Ongoing Harm and Potential TRO Relief (Partial Takedown, No Preservation Confirmation)**

6. On September 21, 2025, Plaintiffs served formal takedown notices to CoStar Group, Zillow, and other platforms demanding removal of unauthorized photographs and virtual tours depicting Plaintiffs, their personal belongings, and business signage.

7. Those notices provided 24/48/72-hour deadlines for compliance, cache elimination, and confirmation.

8. As of the filing of this Motion, Defendants and third-party platforms have taken down certain publicly visible images; however, Plaintiffs have now confirmed through independent searches that multiple images of Plaintiffs' home interior and belongings - watermarked "Meridian Residential Group" - remain accessible on the internet through Google Image Search, including one attributed to Zillow and one tagged "Apartments", with a description in Spanish. Plaintiffs have received no written confirmation of preservation, compliance, or cache elimination. The persistence of these images, coupled with Defendants' prior misconduct, creates ongoing risk of spoliation, reputational injury, and safety harm.

9. Each day of incomplete takedown and lack of written confirmation exacerbates irreparable harm to Plaintiffs' privacy, safety, and reputation, and compounds potential jury exposure. The absence of preservation assurances leaves Plaintiffs unable to verify whether Defendants have deleted, altered, or failed to secure critical evidence. Without written confirmation, Plaintiffs cannot determine whether Defendants or platforms have preserved metadata or merely suppressed display, increasing risk of spoliation.

10. Plaintiffs place this Court on notice that they may be required to seek a Temporary Restraining Order and Preliminary Injunction under Rule 65, SCRCP if noncompliance with preservation, cache elimination, and confirmation obligations persists beyond Court-specified deadlines, regardless of any partial removal of images.

11. Plaintiffs' independent search revealed that Defendants' marketing images had propagated to third-party listing aggregators beyond those originally identified. For example, as of September 23, 2025, the property listing at 181 Gordon Street remains visible on forrent.com with Meridian branding and the same "Coming Soon/renovations" splash used to replace Plaintiffs' images on Zillow, Realtor, and Trulia. This confirms that the original unauthorized images were distributed more widely than disclosed, and that other copies likely remain accessible on additional rental platforms and internet caches. Without written confirmation and systematic cache elimination, the risk of ongoing exposure and evidentiary spoliation persists

**III. Relief Requested**

Plaintiffs respectfully request that this Court:

1. Order immediate redaction of Plaintiffs' residence address and personal contact information from all public filings in this case;
2. Permit substitution of Plaintiffs' newly established P.O. Box as their designated service address for all future filings;
3. That Defendants be ordered, on an expedited basis, to disclose all MLS systems, third-party platforms, and syndication services to which they uploaded or authorized distribution of photographs of Plaintiffs' residence, and to immediately direct those platforms to preserve and remove all such images pending further order of this Court;
4. Take notice of the ongoing unauthorized publication of Plaintiffs' images and belongings - including watermarked images still accessible via Google and Zillow - and recognize the necessity of injunctive relief to ensure full takedown, cache elimination, and preservation compliance; and
5. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 24th day of September, 2025.

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

Meaghan Poyer, Pro Se Plaintiff

**P.O. Box 30386**
**Charleston, SC 29417**

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