STATE OF SOUTH CAROLINA **COUNTY OF CHARLESTON**	)	**IN THE COURT OF COMMON PLEAS** **NINTH JUDICIAL CIRCUIT**
James C. ("Chris") McNeil and Meaghan Poyer, **Plaintiffs,** **v.** **SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC** **Defendants.**	)	**Civil Action No. 2025-CP-10-05095** **EMERGENCY MOTION FOR SHORT HEALTH-BASED PROTECTIVE RELIEF AND TO MAINTAIN ASSIGNMENT WITH JUDGE RODE**

FILED
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JULIE J. ARMSTRONG
CLERK OF COURT

Plaintiff Meaghan Poyer, on behalf of herself and her husband and co-plaintiff, James Christopher ("Chris") McNeil, respectfully moves this Court for narrowly tailored, emergency relief: a brief, one-week health-based protective window limiting direct, non-essential contact from defense counsel while Mr. McNeil seeks urgent medical assessment for severe PTSD symptoms, and clarification that case-management and "emergency" issues remain before the Honorable Thomas J. Rode as the assigned presiding judge in this matter.

This motion is made in good faith, based on documented PTSD symptom severity, a pending criminal investigation into a long-term harassment and gaslighting campaign arising from the same facts, and recent filings and emails aimed at channeling "emergency" issues to a different judge. It is not intended to delay already-scheduled depositions or to obstruct legitimate discovery.

I. BACKGROUND: DOCUMENTED PTSD CRISIS AND PENDING CRIMINAL INVESTIGATION

1. For several months, Plaintiffs have placed the Court and counsel on notice, through filings and correspondence, that they are experiencing a coordinated pattern of harassment, and litigation conduct, now including long-term coordinated gaslighting, designed to destabilize Mr. McNeil's mental health and impede his ability to meaningfully participate in this case.
2. Mr. McNeil has completed validated self-report instruments for PTSD and gaslighting-related harm in connection with this litigation. His most recent PCL-5 score registered in the severe range (76 out of 80), and his gaslighting-severity score likewise reflects an extreme level of coordinated psychological harm consistent with a long-term campaign rather than isolated disagreements.
3. Plaintiffs have also documented a sharp collapse in Mr. McNeil's functioning across multiple domains of life (sleep, work, physical safety, relationships, and creative activity), which correlates temporally with the escalation of defense-driven gaslighting, discovery obstruction, and mischaracterization of his conduct in this case.
4. Because civil mechanisms did not meaningfully slow or correct this pattern, Mr. McNeil recently reported the long-term harassment and gaslighting to the Charleston County Sheriff's Office. That report has been accepted and assigned case number 2026-001263, and the Sheriff's Office has indicated that the matter will be assigned to a detective; Mr. McNeil has been instructed to call back early next week if he has not yet heard from the assigned investigator.
5. At present, Plaintiffs do not have the financial resources to engage ongoing private treatment, but Mr. McNeil anticipates seeking emergency or urgent-care assessment in the coming days, including the possibility of presenting to an emergency department if his symptoms and functional collapse continue to worsen.
6. In the immediate term, the primary medical necessity is to sharply reduce avoidable triggers—especially surprise adversarial communications, manufactured "emergencies," and reframings of his conduct as "threatening"—for a brief window so that he can safely obtain medical assessment and determine whether further accommodations or professional representation will be required to continue litigating this matter without further injury.
7. While Mr. McNeil has necessarily taken the lead on drafting and case presentation to date, Plaintiffs are actively engaging additional legal, medical, and support resources as needed so that this matter can continue to advance even during periods when his direct participation must be limited by legitimate health constraints.
8. To be clear, Plaintiffs are already exploring association with outside counsel so that, if Mr. McNeil's PTSD symptoms require him to reduce his frontline role, a firm can step in to work with him and to interface directly with Ms. Poyer and

the Court; in other words, any attempt to leverage his health crisis as a tactical advantage will only accelerate the involvement of additional counsel and will not halt or derail this case.

II. MERIDIAN'S JOINDER AND RECENT "EMERGENCY" EMAILS DIRECTED TO JUDGE VAN SLAMBROOK

7. On January 27, 2026, Defendants Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles filed a "Joinder in SAC 181, LLC's Motion for Protective Order and MRG Investing Company, LLC's Motion for Stay," expressly adopting SAC 181's Rule 26 motion for protective order and stay of discovery and MRG Investing Company's motion for stay or extension of time, including all arguments and authorities therein.
8. That joinder filing seeks, among other things, to strike Plaintiffs' discovery directed to the Meridian defendants and to join a broader effort to halt or delay discovery on the basis of alleged service defects, even though many of the challenged requests go directly to commingling, veil-piercing, and regulatory issues intertwined with the harms at issue in this case.
9. In a January 28, 2026 email responding to prior correspondence about an "emergency status conference," counsel for the Meridian defendants, Alicia Bolyard, stated that she "join[s] 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," and that she "agree[s] with Counsel for SAC 181 and consider[s] several of Mr. McNeil's most recent communications as threats to [her] clients and [herself], as their attorney."
10. In the same email, Ms. Bolyard expressly addressed "Judge Van Slambrook" and indicated that, if Judge Van Slambrook "needs or wants any other documents or information from us at this time," defense counsel would "be happy to provide," thereby positioning Judge Van Slambrook as the judicial officer to respond to these "emergency" issues.
11. Mr. McNeil's responding email in that chain clarified his understanding that this civil case - including motions originally set for hearing on December 19, 2025 - remains assigned to the Honorable Thomas J. Rode, that Judge McCoy previously granted a continuance of that roster date when defense counsel reported unavailability, and that any consolidated status conference and motion hearing should remain with Judge Rode unless the Chief Judge for Administrative Purposes orders otherwise.
12. Plaintiffs do not object in principle to a properly-noticed status conference. They are, however, concerned that: (a) defense counsel are characterizing Mr. McNeil's safety-motivated communications as "threats" without attaching the

full texts; and (b) "emergency" issues are being directed to a judge other than Judge Rode, who has the most context on the long pattern of privacy violations, retaliatory actions, and gaslighting that is now also the subject of a criminal investigation.

III. NARROW RELIEF REQUESTED

In light of the foregoing, Plaintiffs respectfully request that the Court enter an order providing the following targeted relief:

1. **Seven-Day Health-Based No-Contact Window (Limited to Non-Essential Adversarial Communications)**

   A short, defined window of seven (7) calendar days from the date of the Court's order during which:

   a. Defense counsel shall refrain from initiating direct, adversarial communications to Mr. McNeil (by email, phone, text, or otherwise) that are not strictly necessary to:
   - Preserve already-scheduled depositions and previously-set dates (including but not limited to the February 2, 2026 SAC 181 deposition and the February 9, 2026 LLR investigator deposition); or
   - Comply with existing court orders requiring notice or coordination within that seven-day window.

   b. Any genuinely urgent issues that defense counsel believe must be raised during this seven-day period shall be directed to the Court (or its staff) with Plaintiffs copied, rather than framed as informal "emergency" demands or characterizations of Mr. McNeil as "threatening" in direct counsel-to-pro se correspondence.

   c. Nothing in this seven-day health-based no-contact window is intended to prevent any defendant, insurer, or counsel from initiating or conveying clearly identified, good-faith settlement communications, so long as such communications are not framed as accusations or 'threat' characterizations and do not impose new response deadlines within the seven-day period.

   d. Plaintiffs' existing obligations to comply with current deadlines and scheduled proceedings are preserved, but the Court is asked to defer the imposition of any new, non-essential response deadlines falling within that seven-day window to the week immediately following its expiration,

so that Mr. McNeil can obtain medical assessment and determine his capacity to proceed.

2. **Clarification that Case-Management and "Emergency" Issues Remain with Judge Rode**

   A clarification that, absent a formal reassignment order by the Chief Judge for Administrative Purposes, case-management decisions (including motions for stay, protective orders, and "emergency status conferences") in this matter should be noticed to and heard by the Honorable Thomas J. Rode, who has been presiding over this case to date. Plaintiffs further request that the Court:

   a. Note that unilateral attempts to route "emergency" issues to another judge through selective styling, addressing, or email framing will not, standing alone, effect a reassignment; and
   b. Encourage all counsel that, when characterizing any Plaintiff communication as "threatening" or otherwise problematic, they attach the full text of that communication so that the Court may evaluate it in context rather than through adversarial paraphrase.

3. **Zoom / Remote Deposition Accommodations for Key Witnesses**

   An order that:

   a. The February 2, 2026 deposition(s) of SAC 181, LLC (and/or its designated representative(s)) may proceed by Zoom or comparable remote video platform, with all parties and counsel permitted to appear remotely if they choose, without the need for separate consent by opposing counsel.
   b. The February 9, 2026 deposition of the LLR investigator in Columbia, South Carolina may likewise proceed via Zoom or comparable remote video platform, again without requiring separate defense consent as a condition of remote appearance, given the distance and Mr. McNeil's PTSD-related limitations.
   c. Any objections to the use of remote technology for these two depositions shall be raised by motion showing specific good cause, rather than by default presumptions that in-person attendance is mandatory in the face of a documented PTSD crisis.

4. **Leave to Seek Further Accommodation After Medical Assessment**

   Express leave for Plaintiffs to file, within a reasonable time after Mr. McNeil's urgent medical assessment, a supplemental notice or motion advising the Court whether:

a. His condition has stabilized sufficiently to proceed under existing schedules;
b. Additional, more limited accommodations (e.g., remote participation in certain hearings) are medically necessary; or
c. It has become necessary to seek assistance from outside counsel or to request more substantial scheduling adjustments to prevent further harm.

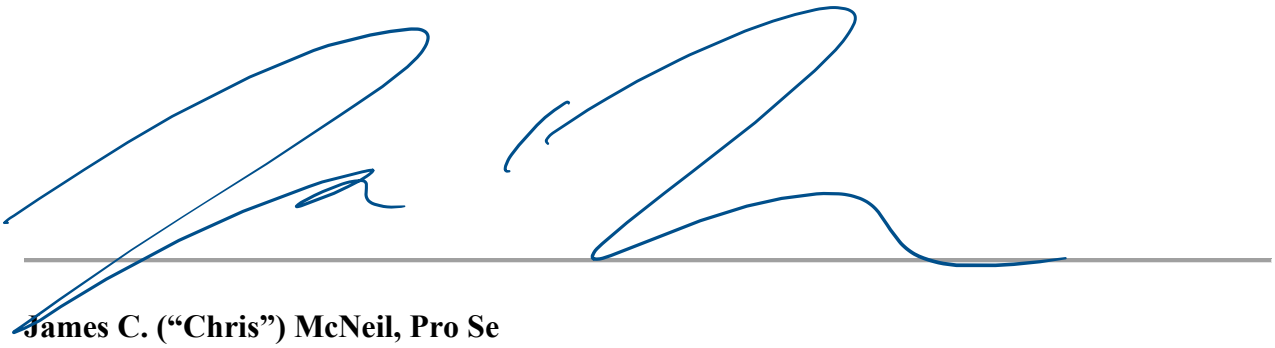
IV. GOOD-FAITH BASIS AND CONCLUSION

This request is intentionally narrow. Plaintiffs are not asking to vacate or postpone the February 2 or February 9 depositions, nor are they seeking to halt discovery in general. To the contrary, they view those depositions - especially of SAC 181 and the LLR investigator - as critical steps toward exposing the full scope of the misconduct at issue and ensuring accountability for both private and institutional actors.

What they seek is: (1) a brief, defined reduction in avoidable, non-essential adversarial contact during a week when Mr. McNeil must focus on urgent medical assessment for severe PTSD symptoms; (2) clear confirmation that this complex and emotionally loaded case remains with Judge Rode unless formally reassigned; and (3) simple, technology-based accommodations that allow key depositions to proceed without forcing Mr. McNeil to endure unnecessary travel and in-person confrontations while in crisis.

Plaintiff Poyer therefore respectfully asks the Court to grant this limited relief so that Plaintiffs can stabilize, preserve their ability to participate meaningfully in the litigation, and continue moving this case forward on a more humane and sustainable footing, rather than allowing a documented PTSD crisis – appearing to have been intentionally created and exacerbated by conduct now under criminal investigation - to be leveraged as a tactical advantage by any party.

Respectfully submitted this 28th day of January, 2026



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