

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

2025 SEP 30 PM 4:54
 CLERK OF COURT
 STATE OF SOUTH CAROLINA
 NINTH JUDICIAL CIRCUIT

MOTION TO COMPEL INSURANCE DISCLOSURE AND FOR SANCTIONS

TO THE HONORABLE COURT:

Plaintiffs James C. McNeil and Meaghan Poyer, appearing pro se, respectfully move this Court to compel Defendants to provide mandatory insurance disclosures and for such sanctions as the Court deems appropriate to ensure future cooperation.

I. PROCEDURAL BACKGROUND

1. On September 10, 2025, Defendants were served with the Complaint.
2. On September 15, 2025, Plaintiffs filed an Amended Complaint.
3. Plaintiffs have made FOUR separate requests for insurance disclosure, all ignored:
 - a. **September 17, 2025 (48-hour deadline):** Email to Mr. Pettis requesting insurance carriers and policy numbers "to facilitate efficient resolution." True copy attached as Exhibit A.

b. September 22, 2025: Email transmitting Enhanced Jury Risk Analysis V3, again requesting insurance information. True copy attached as Exhibit B.

c. September 25, 2025 (48-hour deadline expiring 9/27): Email explicitly requesting insurance coverage information with clear deadline. True copy attached as Exhibit C.

d. September 29, 2025: Email transmitting Jury Risk Analysis V4, noting "Insurance information (outstanding)" as a housekeeping item requiring response. True copy attached as Exhibit D.

4. **Mr. Pettis has not responded to any of these requests.**

5. Only SAC 181's insurer (IPG) has voluntarily engaged, confirming coverage for SAC 181 only and requesting answer extension.

II. LEGAL STANDARD

Rule 26(b)(2), S.C.R.C.P., makes insurance information discoverable:

"A party may obtain discovery... regarding... the existence and contents of any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment..."

While formal discovery typically commences after responsive pleadings, Plaintiffs made reasonable informal requests for information that defendants could voluntarily provide to facilitate case management and settlement discussions. Courts encourage such voluntary exchanges to promote efficient resolution.

Rule 37(d) authorizes sanctions when parties fail to respond to proper discovery requests. While these requests were informal and pre-answer, defendants' complete non-responsiveness over four separate requests spanning thirteen days demonstrates an obstructive approach requiring judicial intervention.

III. ARGUMENT

A. Informal Requests Were Reasonable and Proper

Plaintiffs made four clear written requests for basic insurance information to facilitate:

- Efficient case management with multiple defendants
- Coordination of defense counsel assignment
- Evaluation of settlement possibilities

- Understanding of coverage positions

This information is routinely exchanged informally in the interest of judicial economy.

B. SAC 181's Insurer Confirms Other Defendants Have Insurance

IPG's voluntary engagement proves insurance information exists and is readily accessible. More significantly, IPG's claims examiner Gladys Lambert stated in her September 29, 2025 email: "**I understand the other defendants have their own insurance carriers.**" True copy attached as Exhibit E.

This statement confirms:

1. The other defendants have insurance coverage
2. This information is known to parties in the case
3. There is no legitimate reason for continued refusal to disclose

Despite this confirmation that insurance exists, defendants Meridian Residential Group, LLC; Adam W. Bayles; Tara Bayles; and MRG Investing Company LLC continue to withhold basic carrier and policy information necessary for case management.

C. Complete Non-Response Justifies Court Intervention

While defendants have no formal obligation to respond to pre-answer informal requests, their complete silence across four attempts over thirteen days suggests an intent to obstruct rather than cooperate in case management.

D. Insurance Information Is Prerequisite to Settlement Discussions

SAC 181's insurer stated in her September 29, 2025 email: "It is premature to discuss settlement, I am unable to commit to settlement negotiations at this stage."

This confirms that settlement discussions cannot proceed without basic insurance information from all defendants. The Court and parties cannot evaluate reasonable settlement parameters when:

- Four defendants refuse to disclose insurance carriers or policy limits
- Coverage positions are unknown
- Coordination among multiple insurers is impossible

Defendants' refusal to provide insurance information creates a circular problem: settlement is "premature" because they won't provide the information necessary to make settlement discussions possible.

E. Court Has Authority to Order Disclosure

Under its inherent case management authority and Rule 26(c), this Court may order early disclosure of insurance information to promote efficient case resolution, particularly where:

- Multiple defendants require coordination
- Insurance coverage will determine defense strategy
- Informal requests have been repeatedly ignored
- Information is readily available but being withheld

IV. REQUESTED RELIEF

WHEREFORE, Plaintiffs respectfully request:

A. **ORDER** compelling each Defendant to disclose within five (5) business days:

1. Identity of all insurance carriers providing coverage for claims alleged
2. Policy numbers
3. Policy limits
4. Coverage position (accepted, denied, or reservation of rights)
5. Whether coverage extends to punitive damages
6. Identity and contact information for assigned claims adjusters

B. **SUCH OTHER RELIEF** as the Court deems appropriate to ensure cooperation with case management.

Respectfully submitted this 30th day of September, 2025.



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

Meaghan Poyer

Meaghan Poyer, Pro Se Plaintiff

P.O. Box 30386

Charleston, SC 29417

chris@thaut.io | mcneilandpoyer@gmail.com

EXHIBIT A

September 17 email to Pettis screenshot

Representation and Coverage Clarification – McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-...



chris.thaut.io

To: Eric Pettis; mcneilandpoyer@gmail.com

Cc: Desja Wilder



Reply

Reply All

Forward



Wed 9/17/2025 2:23 PM

 Please treat this as Confidential.

Mr. Pettis,

Thank you for your prior confirmation that you represent SAC 181, LLC; Meridian Residential Group, LLC; Adam W. Bayles; and Tara Bayles. As you also indicated, you do not represent MRG Investing Company, LLC. For clarity and the record:

1. Please confirm that your representation of multiple defendants is supported by written informed-consent conflict waivers consistent with Rule 1.7 of the South Carolina Rules of Professional Conduct.
2. Please confirm whether MRG Investing Company, LLC is currently unrepresented, and if not, identify their counsel so we may proceed with proper service.
3. Finally, to facilitate efficient resolution and in line with Rule 26(b)(2), please identify the **insurance** carriers and policy numbers potentially covering SAC 181, LLC; Meridian Residential Group, LLC; Adam W. Bayles; and Tara Bayles in connection with the claims alleged.

As noted in my prior correspondence transmitting the Amended Complaint and Enhanced Jury Risk Analysis, these issues underscore the urgency of clarifying both representation and coverage at this stage

We believe this information will assist in narrowing issues and streamlining both service and settlement discussions.

Please respond within 48 hours to facilitate proper service and avoid additional procedural delays.

Respectfully,

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs

Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

EXHIBIT B

September 22 email to Pettis screenshot

Enhanced Jury Risk Analysis (V3) - Substantially Revised Exposure Assessment (2025-CP-10-0509...



chris thaut.io

To 'Eric Pettis'; 'mcneilandpoyer@gmail.com'

Cc 'Desja Wilder'



Reply



Reply All



Forward



Mon 9/22/2025 9:48 AM

 Please treat this as Confidential.



Enhanced-Jury-Risk-Analysis-2025-CP1005095-9-21-25-V3.pdf
167 KB

Mr. Pettis,

Attached please find the **Enhanced Jury Risk Analysis (Version 3)**. It supersedes all prior versions. This revision incorporates recently documented privacy violations and systematic misconduct that substantially elevate both compensatory and punitive damage exposure.

The documented ongoing violations may necessitate injunctive relief to halt continued privacy infringement and commercial exploitation.

Two housekeeping items:

1. **Insurance information (outstanding):** Please identify the carriers and policy numbers potentially covering **SAC 181, LLC** and **Meridian Residential Group, LLC**, as well as any personal or E&O coverage for **Adam W. Bayles** and **Tara Bayles**. If coverage counsel has been assigned, provide contact details.
2. **Representation status for MRG Investing Company, LLC:** Confirm whether MRG is still unrepresented. We served its Registered Agent via FedEx/Certified Mail; if counsel appears, please advise so we can coordinate service and communications.

We remain available for **serious settlement discussions** within a range consistent with the exposures outlined in V3. If your clients wish to explore resolution efficiently, please respond with carrier information and a funding source capable of **ACH/wire** performance upon execution.

Respectfully,

Chris McNeil & Meaghan Poyer

Pro Se Plaintiffs

Case No. 2025-CP-10-05095

chris@thaut.io | mcneilandpoyer@gmail.com

Attachments: Enhanced Jury Risk Analysis (V3).pdf

EXHIBIT C

September 25 email to Pettis screenshot

Follow-Up: **Insurance** Disclosure and Motion to Disqualify (Case No. 2025-CP-10-05095)



chris thaut.io

To 'Eric Pettis', 'mcneilandpoyer@gmail.com'

Cc 'Desja Wilder'



Thu 9/25/2025 5:00 PM

 You replied to this message on 9/29/2025 1:15 PM.
Please treat this as Confidential.
This message was sent with High importance.

Mr. Pettis,

I write to follow up on two urgent matters:

1. **Insurance Coverage** – Despite repeated inquiries, you have not confirmed whether any defendant, including SAC 181, LLC, has tendered this matter to its insurer(s) or whether coverage has been accepted, denied, or reserved. Please confirm in writing within **48 hours**.
2. **Motion to Disqualify Counsel** – On September 19, 2025, I filed and served the Motion to Disqualify you and your firm based on non-consentable conflicts of interest under Rule 1.7, S.C.R.P.C. To date, you have not responded. This silence prejudices your clients by leaving unresolved conflicts at the heart of representation. Unless you provide a substantive position by **Monday, September 29, 2025 at noon**, Plaintiffs will move the Court to expedite hearing and seek sanctions.

Respectfully,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
mcneilandpoyer@gmail.com
(843) 818-3495

EXHIBIT D

September 29 email to Pettis screenshot

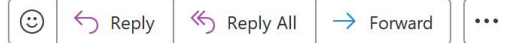
Enhanced Jury Risk Analysis V4 - Case No. 2025-CP-10-05095



chris thaut.io

To Eric Pettis; mcneilandpoyer@gmail.com

Cc Desja Wilder



Mon 9/29/2025 1:16 PM

 Please treat this as Confidential.



Jury-Risk-Analysis-2025-CP1005095-9-29-25-V4.pdf
169 KB

Mr. Pettis,

Attached is Enhanced Jury Risk Analysis V4, which supersedes all prior versions and reflects significant evidence developments since JRA V3.

Key developments:

- 16+ confirmed platforms (vs. 5 in JRA V3)
- Automated syndication evidence via ShowMojo/AppFolio, could be as many as 50+ platforms
- Additional contemporaneous retaliation documentation
- Initial review indicates possible deviation from standard practices (using tenant images rather than staged photos)

Representation status: I understand SAC 181, LLC is insured through IPG, who will be assigning defense counsel. Please confirm whether you continue to represent Meridian Residential Group, LLC; Adam W. Bayles; Tara Bayles; and MRG Investing Company, LLC. If so, please provide their **insurance** carrier information to facilitate coordination.

Motion to Disqualify: The September 29 deadline has passed without response. With SAC 181 now obtaining separate counsel through IPG, please confirm by 12:00 Noon September 30, 2025 whether Meridian Residential Group, Adam Bayles, Tara Bayles, and/or MRG Investing Company are also obtaining separate representation.

If the remaining conflict issues are being resolved through counsel separation, that affects the urgency of the expedited hearing motion. If I don't hear from you by 12:00 Noon September 30, 2025, I'll proceed with filing the motion for expedited hearing.

Resolution: I'm available to discuss resolution at any stage. The JRA V4 ranges reflect current exposure analysis based on evidence developments through September 2025.

Respectfully,

James C. McNeil & Meaghan Poyer

Plaintiffs Pro Se

EXHIBIT E

September 29 email from Lambert screenshot

RE: Concerning claim 147434 - SAC 181 LLC (63522-91095)



Gladys Lambert <gladys.lambert@ipgclaims.com>
To: chris.thaut.io; mcneilandpoyer@gmail.com



Mon 9/29/2025 11:25 AM

You replied to this message on 9/29/2025 12:44 PM.

Good morning,

It is premature to discuss settlement, I am unable to commit to settlement negotiations at this stage. My insured is SAC 181, LLC. As such, I am only requesting an extension for this defendant. I understand the other defendants have their own insurance carriers.

Regards,



Gladys Lambert, MBA, CPCU, AIC, AINS, CA License 6003996 (IPG)
Senior Claims Examiner
gladys.lambert@ipgclaims.com
Direct : 501-725-3425 (Phone/Text/Fax)
Toll Free : 800-684-9157 x4095

International Programs Group - ipgclaims.com
P.O. Box 45058, Little Rock, AR 72214

This email communication is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any use of this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the email and all copies (electronic or otherwise) immediately.

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

Sent: Monday, September 29, 2025 10:08 AM

To: Gladys Lambert <gladys.lambert@ipgclaims.com>; mcneilandpoyer@gmail.com

Subject: RE: Concerning claim 147434 - SAC 181 LLC (63522-91095)