STATE OF SOUTH CAROLINA **COUNTY OF CHARLESTON**	)	**IN THE COURT OF COMMON PLEAS** **NINTH JUDICIAL CIRCUIT**
James C. ("Chris") McNeil and Meaghan Poyer, **Plaintiffs,**	)	**Civil Action No. 2025-CP-10-05095**
v.	)	**PLAINTIFFS' NOTICE OF PRE-HEARING SAFETY AND CASE-MANAGEMENT MATTERS, REQUEST FOR TEMPORARY RESTRAINING ORDER AND COURT-ORDERED FORENSIC AUDIT OF ALTMAN-CONTROLLED ENTITIES, AND PROPOSED ROSTER REORGANIZATION FOR MAY 28, 2026 HEARING**
SAC 181, LLC, **Meridian Residential Group, LLC,** **Adam W. Bayles, individually,** **Tara Bayles, individually, and** **MRG Investing Company LLC** **Defendants.**	)	

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JULIE J. ARMSTRONG
CLERK OF COURT

Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer respectfully submit this Notice and Request in advance of the May 28, 2026 hearing before the Honorable Will Wheeler. This filing presents a narrow set of actions that can restore functional order to a case whose underlying record now reaches beyond a private landlord-tenant dispute and into a broader convergence of judicial, administrative, policy, and narrative-system failures already visible on the public record.

The urgency here arises from a specific structural condition already documented in this case: a minimizing false narrative of events has been preserved through friction, delay, selective process movement, and narrative minimization across multiple reinforcing lanes at once. Plaintiffs' record describes executive and administrative

obstruction in the LLR and sheriff pathways, judicial asymmetry and motion blackout in the Common Pleas docket, conflict-laden housing-policy overlap in the city's affordability governance sphere, and a local press environment whose incentives, as set out in Exhibit B, have preserved elite plausibility rather than serving as a corrective feedback loop. The result is a captured narrative system where evidence, harm signals, and corrective pressure encounter friction at each higher layer.

This matters now because the system is reaching the point described throughout Plaintiffs' filed materials as false-narrative collapse. The April 28, 2026 return-request letter from the Supreme Court of South Carolina placed the long-running motion-blackout pattern under active supervisory review, and the documentary record already before this Court has become too dense to remain quietly subordinated to the routine "these harms didn't happen" frame advanced by Defendants. Plaintiffs' Whistleblower Revelations Report identifies the familiar sequence that follows when a status-protective narrative begins to fail: initial minimization, reframing of the truth-teller, institutional delay, selective enforcement of process, and then concentrated pressure on the party closest to the evidence once outside scrutiny arrives.

That sequence carries practical consequences for this Court's pre-hearing decisions. When multiple institutions have become invested in the continuity of a false narrative, acknowledgment of the actual record can trigger rapid retaliation, intensified narrative inversion, further procedural obstruction, and movement of assets before civil

accountability reaches judgment. Plaintiffs therefore ask this Court to act now in the two domains most sensitive to false-narrative collapse: protection of the vulnerable parties' access and safety, and preservation of the asset base against further conversion or transfer.

The record already supports immediate action on the papers in five areas:

- **First, Plaintiffs' Supplemental Motion for ADA Accommodations has been pending since January 30, 2026**, and the record already contains the disability, reasonableness, and hearing-access material necessary for a chambers ruling before May 28.
- **Second, Plaintiffs' Motion for Leave to File the Second Amended Complaint has remained pending since October 24, 2025**, and the eventual opposition filed on April 21, 2026 engaged none of the evidentiary record central to the proposed pleading.
- **Third, Plaintiffs' December 23, 2025 Rule 36 sufficiency motion offers a direct narrowing mechanism** whose pre-hearing review can materially reduce the number of live factual disputes and derivative motions.
- **Fourth, the record supports immediate status-quo preservation relief directed to the Altman-controlled entity cluster**, or at minimum the fallback notice, preservation, and expedited forensic-discovery measures set out in

Section V, in light of the documented January 12, 2026 early mortgage payoff on 39 Wappoo Creek Place and the short interval remaining before May 28.

- **Fifth, the Supreme Court's active supervisory posture makes continuity of assignment under Judge Wheeler the cleanest available stabilizing response** within the trial court system.

Plaintiffs ask the Court to view these requests as a coordinated protective sequence. Access relief, pleading regularization, Rule 36 narrowing, asset-preservation relief, and continuity of assignment each serve the same core judicial purpose: they create a stable procedural boundary before the false narrative system reacts further to the evidence already on file. Exhibit C shows that several matters presently set for May 28 are ripe for papers-only resolution or pre-hearing narrowing, and that such action can reduce the live hearing from a crowded roster of accumulated motions to a smaller set of organized substantive segments.

The safety dimension is therefore inseparable from case management. Plaintiffs' filings already connect the "Ask-Harm Loop" to documented severe clinical injury, including a PCL-5 score of 76/80, and describe a record in which requests for fairness, access, and correction have repeatedly been answered with escalating burden, delay, and narrative distortion. In that environment, a pre-hearing order that secures accommodations, preserves collectibility, and confirms stable assignment establishes the protective frame within which truthful adjudication can proceed.

The public-integrity dimension is also already before the Court. Exhibit B describes this matter as a compact local test of a larger national pattern: private extraction incentives, procedural inequality for pro se parties, regulatory friction, policy conflict, and media silence aligning around a live dispute until supervisory visibility forces reconciliation with the record. Plaintiffs present that systems frame here for a practical reason: once a false narrative sustained by multiple institutions begins to fail, the period immediately surrounding acknowledgment is the period in which both retaliation risk and asset-flight risk rise most sharply.

This Court's role is therefore uniquely important. Judge Wheeler's assignment already reflects the judiciary's own recognition that stable neutrality is needed here, and continuity under this Court offers the most direct route to restoring procedural legitimacy while the Supreme Court's supervisory record remains open. Plaintiffs respectfully request that the Court use the present filing as the off-ramp identified in the concurrently filed Supreme Court supplement: grant the access relief; regularize the pleading; narrow the facts; preserve the asset base; streamline the May 28 hearing; and keep the matter under a single coherent judicial hand through trial-setting and the next pleading stage.

The sections that follow present those requests in the order most likely to restore function before further escalation occurs: immediate ADA ruling and hearing-access election; regularization of the Second Amended Complaint; Temporary Restraining

Order and related preservation relief; reorganization of the May 28 roster; continuity of assignment; and the referral relief requested on the predicate facts already established in the record.

I. PLAINTIFFS' POSTURE AND THE PURPOSE OF THE "WHISTLEBLOWER" LABEL

In explanation of Plaintiff McNeil's posture with the case, the Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference, Filed February 10, 2026 in 2025-CP-10-05095, states *"The behavior of defense aligns with research on the negative effects of status bias - research shows established members of a field have reduced performance and default to rigid behaviors when their perceived status difference with an individual is not met with a concurrent lower performance. But Plaintiff Chris McNeil honors the principle of justice and equity at the heart of the legal professional and has intended his unexpected competence level not as an affront but as a service to the Court and to housing justice by a professional whose parallel expertise in systems interventions and strategic communication is relevant to the evidentiary record."*

That introduction has 3 sections covering

1. Alignment With Court and Purpose of Legal Institution,
2. The Unintended Duration, and
3. Additional Perspective: Systems Study from the Vulnerable Tenant's Perspective,

and is provided in full for convenience in EXHIBIT A.

Whistleblower definition in this context and acknowledgment. Plaintiffs use the term "whistleblower" in this filing strictly to define Plaintiff McNeil's role within the systems model - the party closest to the evidence who makes previously invisible patterns visible so that the system can correct itself. Plaintiffs acknowledge that the term does not function as a legal definition available to Plaintiff McNeil under South Carolina or federal whistleblower-protection statutes in this posture; Plaintiffs use it only as a systems-analytic label because it enables better prediction of future system behavior and identifies where corrective intervention is most efficient. The predictive point is specific: **in false-frame systems, the party closest to the evidence is subjected to a sequence of initial minimization, character reframing, institutional delay, and selective process enforcement until outside supervisory attention breaks the loop.** The Supreme Court's April 28 return-request letter is the outside supervisory attention arriving in this matter. [EXHIBIT A: Explanation of Plaintiff's Pro Se Posture and Consultant Role.]

II. PRESENT PROCEDURAL POSTURE

APPARENT CONSTITUTIONAL VIOLATIONS REQUIRING JUDICIAL CORRECTION

Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer respectfully submit this Notice and Request in advance of the May 28, 2026 hearing before the Honorable Will Wheeler. In spite of its consistent characterization as such by defense, the case before this Court is not, in its current posture, a routine landlord-tenant dispute. The record now establishes three intersecting constitutional and structural failures that require this Court's awareness before any motion is reached on the merits:

A. Fourteenth Amendment Equal Protection Violations. The U.S. Constitution guarantees equal access to the courts regardless of representation status. The documentary record in this case establishes a pattern of differential treatment between represented defense counsel and pro se Plaintiffs that meets the Canon 3(E) standard for the appearance of partiality and raises a substantial Equal Protection question:

- The October 7, 2025 returned-orders directive instructed Plaintiffs to file motions without proposed orders and wait for hearings. Plaintiffs complied. Plaintiffs' motions were scheduled for hearing twice—December 19, 2025 and April 3, 2026. Both hearings were continued by Judge McCoy, the first on a consent representation that Plaintiffs documented as fabricated in their filed opposition, and the second displaced by a March 26, 2026 administrative letter raising an assignment question that had already been resolved at the February 9, 2026 scheduling conference. The resulting 199+ day motion blackout prompted the South Carolina Supreme Court's April 28, 2026 return-request letter in Appellate Case No. 2026-000919.
- On April 2, 2026, defense counsel submitted a proposed order with a routine motion. It was signed within five business days.
- Chambers staff have been documented selectively filtering Plaintiffs' safety filings under misapplied "ex parte" classifications while informally advancing remote-appearance accommodations for defense counsel (March 27, 2026 Supplemental Notice).

These are not isolated administrative choices. Taken together, they establish a procedural architecture in which institutional status—not the merits—has determined which filings move

and which do not. [EXHIBIT F Plaintiff's Motion for Recusal of the Honorable Jennifer McCoy]

B. Court Collusion With the Defense's "Didn't Happen" False Frame. The defense's primary litigation strategy has been to gaslight the docket: to litigate as if the falsified federal postmark, the 21-platform image syndication, the LLR obstruction, and seven of the eight original harms simply did not occur. That strategy could not survive a court that ruled on the evidence already filed. The local court's pattern of open-ended continuances—including the December 1, 2025 Order of Continuance and the March 26, 2026 displacement of the April 3, 2026 hearings - has functioned, regardless of subjective intent, to provide the procedural cover that strategy requires. The Supreme Court is now watching because the local administration was not doing its job.

C. Structural Pro Se Discrimination Baked Into the System Design. Beyond the documented conduct of specific judicial officers and staff, the Charleston Common Pleas system architecture itself creates a constitutionally suspect two-tier access regime. Pro se litigants are excluded from electronic filing - a privilege reserved exclusively for attorneys in South Carolina - and are instead required to hand-file paper documents at the Clerk's office in tourism-congested downtown Charleston. The practical consequences are severe and visible:

- **Visual degradation.** The Clerk's scanner converts color screenshots and evidentiary photographs into streaky black-and-white line drawings, destroying forensic detail critical to Plaintiffs' privacy-invasion and image-syndication claims. Defense e-filings arrive in full color with an "ELECTRONICALLY FILED" watermark that signals institutional legitimacy. Pro se filings arrive looking like photocopies of photocopies. [EXHIBIT E :

Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]

- **Filing friction.** Each filing requires driving into downtown Charleston, finding scarce and expensive parking, walking through congested streets and courthouse security, waiting for documents to be stamped, and repeating the entire process for proof-of-service documents that must be filed on a separate trip. A single filing-and-service cycle consumes a minimum of two hours. For counsel, the identical process is one click. [EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]
- **Text searchability.** E-filed documents are natively text-searchable. Hand-filed scans are image files—meaning a judge or clerk searching the docket electronically for key terms will find only counsel's filings, rendering pro se filings functionally invisible to keyword-based review. [EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]
- **The Supreme Court's own practice refutes the stated justification.** South Carolina excludes pro se filers from e-filing on the stated premise that lay persons lack technical sophistication. Yet the South Carolina Supreme Court itself provided Plaintiffs with an email address for filing, accepted electronic submissions promptly, was courteous and helpful by phone, and docketed Plaintiffs' Petition for Writ of Mandamus—then acted on it within 14 days. The technical-sophistication rationale is a fiction that operates as structural discrimination.

This two-tier architecture does more than inconvenience pro se litigants. It marks their filings as visually inferior at a glance, degrades evidentiary quality, increases physical and time burden by

orders of magnitude, and creates a system in which institutional actors can more easily ignore or deprioritize pro se work product. It is the physical infrastructure of the "Justice Requires Status" false frame identified in the Venn Diagram. [EXHIBIT B: Whistleblower Revelations Report; EXHIBIT E : Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas]

D. The Reason Judge Wheeler Is Here. Plaintiffs understand that Judge Wheeler has been brought into this matter precisely because the structural neutrality of the Ninth Circuit administration in this case has been called into question at the state level. Plaintiffs ask that this Court recognize the litigation environment that triggered the SC Supreme Court Return Request and refuse to return Plaintiffs to it. The evidence supporting every claim in this Notice is already on the docket - much of it placed there by Plaintiffs' March 6, 2026 Systems Analysis Brief in Aid of Judicial Efficiency, and its accompanying exhibits, specifically to bypass the local docket's selective gating that has held up granting leave for the Second Amended Complaint, which is “freely given when justice so requires” per SC law, for 199 days at the time of filing this, and unopposed for 179 of those days.

The remainder of this Notice describes Plaintiffs' posture, identifies the three false frames sustaining the defense's position, and offers Judge Wheeler a clear, precedent-supported path to and through the May 28 hearing.

III. IMMEDIATE ADA RULING AND IN-PERSON PARTICIPATION ELECTION

Plaintiffs' Supplemental Motion for ADA Accommodations has been pending since January 30, 2026 - 101 days as of this filing. The record documents severe clinical harm, including a PCL-5 PTSD score of 76/80, arising directly from litigation conditions; access and safety therefore sit squarely before the Court as ministerial ADA matters once disability and reasonableness are established, both of which are documented on the record.

Plaintiffs respectfully request an immediate chambers ruling granting the pending accommodations, including electronic filing access, remote-appearance parity, scanner and graphic-preservation accommodations, and any related service or filing accommodations the Court finds necessary to ensure equal access through and including the May 28 hearing.

Election regarding the May 28 hearing itself: Plaintiffs elect, consistent with the accommodations granted, to appear in person at the May 28 hearing. The decision is made with full awareness of the documented clinical risk. Plaintiffs make it because the May 28 hearing will be the first occasion on which Plaintiffs and the defense actors whose documented conduct produced the injury appear in the same physical room before a judicial officer empowered to act. Congruence between word, body, and record is most visible in person; Plaintiffs' capacity to stand in that congruence, and the Court's capacity to observe the contrast between the parties' respective postures in person, are each a meaningful contribution to an accurate record. Plaintiffs therefore request that the granted accommodations operate as a floor rather than a ceiling: remote appearance remains available as a fallback if clinical conditions on May 28 require it, but the primary election is in-person attendance, with supportive accommodations (e.g., a brief mid-session break if needed, a seat positioned to reduce startle response, and a clear protocol for pro se digital exhibit display) in place to make that attendance sustainable.

IV. MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT - REGULARIZE BEFORE HEARING

Plaintiffs' Motion for Leave to File the Second Amended Complaint has now been pending 199 days. Defendant SAC 181's opposition memorandum appeared on April 21, 2026 - 179 days after its filing, and one week after all defense counsel was CC'ed on an email thread serving Judge Van Slambrook, Judge Rode's and Judge McCoy's chambers with notification the Petition for Writ of Mandamus was received and docketed by the SC Supreme Court on April 14, 2026 (Case No. 2026-000919). The opposition engages none of the evidentiary record supporting the proposed pleading.

Plaintiffs respectfully request that the Court, on the briefs and without further hearing:

A. Strike SAC 181's April 21, 2026 opposition as untimely and as engaging no merits, or otherwise disregard it as dilatory;

B. Grant leave to file the Second Amended Complaint, which adds Charles S. Altman as an individual defendant and adds the image-syndication invasion-of-privacy counts that are central to the documented harms;

C. Shorten the answer period to ten (10) days from service so that pleadings close before or as near as practicable to May 28; and

D. In the alternative to a ruling on the briefs, deem the Second Amended Complaint granted in light of the 199-day (179-day unopposed) delay, pursuant to this Court's supervisory power and consistent with SCRCP Rule 15(a)'s directive that leave "shall be freely given when justice so requires."

V. REQUEST FOR TEMPORARY RESTRAINING ORDER (STATUS QUO INJUNCTION) AND COURT-ORDERED FORENSIC AUDIT - ALTMAN-CONTROLLED ENTITY CLUSTER

A. Why a TRO is warranted now, before May 28

The record already contains verified evidence that the flight of capital has begun:

1. December 3 and 11, 2025: Plaintiffs file the Probate Valuation Memorandum and Supplemental Memorandum, placing on the public record the gap between a sworn $251,000 per-share probate valuation and a documented portfolio exposure in the tens of millions.

2. January 12, 2026: Charles S. Altman executes a satisfaction of mortgage on 39 Wappoo Creek Place - approximately seventeen months early, post-Amended-Complaint, and after the Second Amended Complaint naming him individually was on the docket and before leave was granted. The transaction converts liquid, auditable cash into residential equity that is highly protected under South Carolina homestead doctrine and therefore largely outside the reach of post-judgment collection.

3. April 28, 2026: The Supreme Court's return-request letter places the selective-action pattern before the highest court in the State. The defense is now on notice that the local procedural shield has become visible as a matter of supervisory record.

The arithmetic is unforgiving. Three weeks remain between this Notice and the May 28 hearing. In that window, quitclaim deeds, inter-entity cash transfers, and further conversion of non-

exempt assets into protected forms are each completable in days. Giving Defendants three weeks of notice of an asset-freeze hearing is the very event most likely to trigger the asset flight the freeze is designed to prevent.

B. Scope of the requested TRO

Plaintiffs request, pursuant to SCRCP 65(b) and this Court's equitable authority, a Temporary Restraining Order / Status Quo Injunction enjoining Charles S. Altman, Jonathan S. Altman, and any entity in which either holds an ownership, Registered Agent, beneficial-ownership, or controlling-management interest, from:

(i) selling, transferring, assigning, encumbering, or creating any new lien on any real property;

(ii) executing any cash transfer outside the ordinary course of business, including any inter-entity transfer, loan, capital contribution, or distribution that is not documented in contemporaneous business records as a recurring, ordinary operating expense; and

(iii) converting non-exempt assets into protected or exempt forms (including further mortgage payoffs, retirement-account contributions, or trust transfers) pending the May 28 hearing and any subsequent Rule 16 scheduling order.

Ordinary course operations - payroll, recurring utilities, recurring vendor payments, routine property maintenance, and the like - remain entirely unaffected. The request is calibrated to preserve the status quo, not to interfere with the operation of any functioning business.

Entities specifically identified on the present record include (but are not limited to): SAC 181, LLC; Meridian Residential Group, LLC; MRG Investing Company, LLC; 98-100 Market Street, LLC; Charles Realty Company, Inc.; 1801 Reynolds, LLC; BST 2009, LLC; TBBS 2009, LLC;

Knightsville Four 2010, LLC; Derfner Altman, LLC; Altman Coker, LLC; and the parcels held by those entities, including without limitation 39 Wappoo Creek Place; 18 Lavington Road; 181 Gordon Street; 171 and 177 Gordon Street; and 8310 Rivers Avenue Unit B.

C. Why the entity cluster rather than named defendants alone

The Second Amended Complaint adds Charles S. Altman individually and pleads enterprise liability and veil-piercing. The record supports the inference that Charles S. Altman exercises singular, operational control across this entity cluster: commingled check addresses, shared registered-agent filings, parallel mailing addresses, probate-filing patterns, and the documented Flash Transfer all point to a single operational hand moving assets between entities. A transfer from SAC 181, LLC to 1801 Reynolds, LLC, or from Charles Realty Company, Inc. to a peripheral entity, is functionally a transfer from one Altman pocket to another. The TRO scope tracks that operational reality and prevents Defendants from using the entity structure to defeat the collectibility of a judgment.

D. Court-ordered forensic audit

Plaintiffs further request that the Court order a forensic audit, at Defendants' expense, of the Altman-controlled entity cluster, conducted by an independent forensic accountant agreed upon by the parties or appointed by the Court. The Charles S. Altman registered-agent footprint alone spans approximately sixty-two entities; the Jonathan S. Altman footprint adds approximately forty-one additional entities. Audit scope should include:

(i) the Schedule F valuation pattern across the Israel/Edith/Samuel Altman estate sequence, including the 95.4% per-share CRC devaluation;

(ii) the per-share valuation trajectory of Charles Realty Company, Inc. and related holding entities;

(iii) bilingual Register of Deeds indexing artifacts and the Orangeburg insider conveyance pattern;

(iv) inter-entity transfer histories, with particular attention to the 12-month window preceding and the window following the filing of the Amended Complaint on September 15, 2025; and

(v) the January 12, 2026 mortgage-payoff transaction and related source-of-funds analysis.

E. Fallback relief

Should the Court decline the full TRO, Plaintiffs respectfully request, as immediate fallback relief:

1. A Notice Order requiring Defendants and the identified entities to provide the Court and Plaintiffs with fourteen (14) days' written notice before executing any sale, transfer, encumbrance, or new lien on any real property, or any extraordinary cash transfer;

2. Expedited forensic discovery into the banking records, transfer histories, and entity-governance records of SAC 181, LLC, Meridian Residential Group, LLC, Charles S. Altman individually, and Jonathan S. Altman individually, on a fourteen-day production schedule; and

3. Preservation orders directed to third-party financial institutions identified in the existing Synovus subpoena and in any related deposit, mortgage, or brokerage relationships.

VI. MAY 28, 2026 HEARING ROSTER REVISION RECOMMENDATIONS

The May 28, 2026 hearing inherits a roster of motions that have accumulated in part because of the procedural asymmetries described in Section I. Plaintiffs respectfully offer the Court two organizing tables. The first identifies pre-hearing matters that, in Plaintiffs' view, the record now supports being addressed administratively or by short order before the hearing convenes. The second sets out Plaintiffs' stance on each motion currently on the May 28 roster, with the procedural authority that supports it. Plaintiffs offer these as a clarifying aid; the Court retains full discretion over its own docket.

Table A — Pre-Hearing Matters Ripe for Administrative Resolution

#	Matter	One-Sentence Basis	Filed / Supported By
1	Immediately Grant Pending ADA Accommodations	Plaintiff McNeil's clinical PTSD (PCL-5: 76/80) and reduced functional capacity require e-filing access and remote-appearance authorization; the request has been on the docket since January 2026 and aligns with the March 27 Supplemental Notice.	Supp. ADA Motion, 1/30/26; Supp. Notice, 3/27/26
2	Grant Leave to File Second Amended Complaint (2AC)	Pending 199+ days unopposed; Rule 15(a) mandates leave "freely given when justice so requires"; consolidates the 21 image-exploitation counts and adds Charles S. Altman individually for veil-piercing on facts noticed since December 2025.	Motion for Leave, 10/24/25; Brief in Aid of Safety, 3/20/26
3	Deemed Admissions Under SCRCP Rule 36(a)	The December 23, 2025 Motion for Determination of Sufficiency of RFA Responses has been pending without substantive defense response; Rule 36(a) provides that evasive or insufficient responses are deemed admitted upon motion.	RFA Sufficiency Motion, 12/23/25; Omnibus Brief, 2/24/26

#	Matter	One-Sentence Basis	Filed / Supported By
4	Recognition of March 6, 2026 Filing as Operative Framework	The Brief in Aid of Safety Risk Mitigation and Judicial Clarity, with Exhibits A1–A3, B, and C, is on the docket and unopposed on the merits; it provides the single-read organizing framework for the case.	Brief in Aid of Safety, 3/20/26

Table B — Plaintiffs' Stance on Motions Currently Set for May 28, 2026

Noticed Motion	Filed By	Plaintiffs' Stance	Procedural Basis
Motion to Quash Synovus Subpoena	Defense (Phelps Dunbar)	**Oppose; deny.** Quash motion was filed outside the SCRCP 45(d)(2)(B) window, waived under *Ex parte Smith*, 407 S.C. 422 (2014); the records are directly relevant to veil-piercing (Count VI).	Cross-Motion to Disqualify, 1/14/26; Omnibus Brief, 2/24/26
Motion to Quash LLR Deposition	Defense	**Oppose; deny.** The LLR investigation is central to the regulatory obstruction documented in Exhibit C of the March 6 Brief; LLR counsel's presence is appropriate.	Brief in Aid of Safety, Ex. C, 3/20/26
Motion to Stay (Joinder)	Defense	**Rendered moot if pre-hearing matters in Table A resolve.** A stay presupposes contested claims; deemed admissions and Rule 15(a) leave eliminate the basis for delay.	Omnibus Brief, 2/24/26
Motion to Cancel Lis Pendens	Defense (SAC 181)	**Oppose; deny.** The Lis Pendens is properly grounded in the veil-piercing and probate-fraud claims pled in the Amended Complaint and elaborated in the 2AC; cancellation would	Probate Memo, 12/3/25; Supp. Memo, 12/11/25

Noticed Motion	Filed By	Plaintiffs' Stance	Procedural Basis
		prejudice judgment collectibility.	
Cross-Motions to Disqualify Defense Counsel (Phelps Dunbar; Resnick & Louis)	Plaintiffs	**Sustain.** RPC 1.7(b)(3) unconsentable conflicts; documented captured-counsel dynamic blocking evidence supporting their own clients' separateness defense.	Cross-Motion to Disqualify, 1/14/26
Motion for Recusal of Hon. Jennifer B. McCoy	Plaintiffs	**Sustain.** Canon 3(E) appearance standard met by documented procedural asymmetry, the Dennis-clerkship intersection, and continuance pattern.	Motion for Recusal, 5/7/26
Notice of Permanent Withdrawal from Settlement	Plaintiffs	**For the record.** Trial is now the sole disposition path; supports request for date-certain Fall 2026 trial setting.	Notice of Withdrawal, 5/1/26
Plaintiffs' Request for Date-Certain Fall 2026 Trial	Plaintiffs	**Sustain.** Open-ended scheduling functions as a harm multiplier under the documented system conditions; date-certain setting is the requested boundary.	This Notice, § V

Plaintiffs respectfully submit these tables as an organization aid. The procedural authority supporting each item rests on filings already on the docket and on the South Carolina Rules of Civil Procedure as applied to those filings. Plaintiffs ask the Court to recognize that the path to a clean, constitutionally sound May 28 hearing runs through the matters in Table A, and that the Court's awareness of Plaintiffs' stance in Table B is offered to streamline, not direct, the proceedings.

Exhibit C provides a Current Versus Recommended Roster Table that, for each of the 26 matters on the May 28 published roster and four supplemental case-management matters not yet on the roster, identifies (a) the filing date, (b) the recommended pre-hearing act, (c) the effect of that

act, (d) the recommended within-hearing treatment, and (e) the predictable defense point each treatment answers. Of the 30 total matters, eight are flagged as pre-hearing priority candidates whose disposition before May 28 would collapse the live roster from 26 motions to approximately 8–10 substantive segments, restoring function to the hearing and preserving collectibility of any judgment. [Exhibit C Current Versus Recommended Roster Table for May 28, 2026 Hearing]

VII. SAFETY, UNCLEAN HANDS, AND THE CASE FOR THIS SEQUENCE

This sequence is supported by the record of Defendants' unclean hands. Defendants have repeatedly sought advantage from delay, fragmentation, discovery resistance, and procedural asymmetry while core Plaintiff motions remained unheard for months and while ADA-related needs remained unresolved. Under those circumstances, Defendants should not receive further benefit from arguing derivative stay, quash, dismissal, or sanctions motions before the Court first resolves the threshold matters that clarify the pleading, narrow the facts, restore equal access, and preserve the collectibility of any judgment.

Plaintiffs have prepared a Whistleblower Revelations Report documenting the public-interest dimension of this case - the CRE-development / law / politics / tenant-exploitation cluster, the institutional-enabler pattern, and the captured-system false-frame dynamics that parallel the Theranos, Enron, and Wells Fargo whistleblower precedents. That Report serves as the basis for national investigative journalism outreach intended as both mitigation for damages by raising awareness of the power of the platform that created the Housing Justice Audit, and mitigating

safety risks through public attention on the case, and to accompany this Notice as an exhibit to a SC Supreme Court Supplement to the Petition for Writ of Mandamus therefor placing the case's public-interest dimension on the continuous record before both this Court and the Supreme Court. [Exhibit B: Whistleblower Report: False-Frame Collapse, System Capture, and Public-Interest Implications in McNeil & Poyer v. SAC 181 et al]

The unclean-hands record is not limited to procedural conduct. The same window in which core Plaintiff motions sat unruled produced documented asset-side conduct consistent with the very judgment-evasion concerns the pending Lis Pendens and TRO request are designed to prevent. The December 3 and 11, 2025 Probate Valuation Memorandum and Supplemental Memorandum placed before the Court a sworn $251,000 per-share probate valuation set against documented portfolio exposure in the tens of millions. Approximately one month later, on January 12, 2026 - post - Amended-Complaint, and with the Motion for Leave to File the Second Amended Complaint naming Charles S. Altman individually already on the docket - Charles S. Altman executed a satisfaction of mortgage on 39 Wappoo Creek Place approximately seventeen months in advance of the 2017 instrument's maturity schedule, converting liquid auditable cash into residential equity highly protected under South Carolina homestead doctrine and substantially outside the reach of post-judgment collection. [Exhibit D: Charles S. Altman January 12, 2026 Early Mortgage Payoff on 39 Wappoo Creek Place; underlying 2017 Mortgage Instrument.]

VIII. CONTINUITY OF JUDGE WHEELER'S ASSIGNMENT AND CONTINUED SUPREME COURT SUPERVISION

The April 28, 2026 return-request letter from the Supreme Court of South Carolina in Appellate Case No. 2026-000919 placed the long term motion blackout pattern under active supervisory review at the highest court in this State. On April 29, 2026, Plaintiffs emailed a written recusal request to the Honorable Jennifer Blanchard McCoy that documented the fabricated-consent continuance of December 19, 2025 and the demonstrably-false administrative-assignment predicate underlying the March 26, 2026 indefinite continuance of the April 3, 2026 hearings. Judge McCoy has not responded to that recusal request as of the filing of this Notice - a non-response that occurred after the Supreme Court's return-request letter was already on the public docket and after Judge McCoy was personally cc'ed on the email thread serving the SCSC return-request to all counsel of record. The non-response itself, occurring under direct Supreme Court supervision, demonstrates that the local procedural environment that produced the original blackout has not corrected, and confirms that returning this case to the rotating Ninth Circuit bench would predictably reproduce the conditions the Supreme Court is currently reviewing.

Plaintiffs respectfully request that this Court enter a continuity order providing that:

(i) Judge Wheeler retain assignment over this matter through trial, including all pre-trial motions, scheduling orders, and any subsequent amended-complaint proceedings, pursuant to this Court's institutional interest in stable adjudication of a case under active Supreme Court supervisory review;

(ii) the Clerk of Court serve a copy of any order entered pursuant to this Notice on the Supreme Court of South Carolina in Appellate Case No. 2026-000919, so that the supervisory record continues to reflect the actions taken in this matter; and

(iii) all subsequent motion practice in this action, including matters arising from any amended pleading, remain on Judge Wheeler's docket under the same continuity-of-assignment principle.

Why continuity matters. Judge Wheeler's assignment was itself the institutional response to the structural neutrality concerns the SCSC return-request letter placed on the record. Continuity of Judge Wheeler's assignment, paired with continued SCSC docket supervision, replaces the broken structural condition with a sound one and preserves the integrity of the supervisory architecture across the full arc of this litigation, including the pleadings stages still ahead.

IX. JUDICIAL REFERRAL TO INVESTIGATIVE AND DISCIPLINARY AUTHORITIES

The record now before this Court contains predicate facts for three categories of conduct that exceed the boundaries of civil discovery abuse and enter the territory of completed criminal acts under South Carolina and federal law. Plaintiffs respectfully ask the Court to exercise its institutional referral authority - distinct from, and considerably more weighty than, a private citizen complaint - to place these matters before the agencies statutorily charged with their investigation, and to enter a continuity-of-assignment order that preserves the supervisory architecture the Supreme Court of South Carolina established through its April 28, 2026 return-request letter in Appellate Case No. 2026-000919.

A. Why a Judicial Referral, and Why Now

A referral signed by this Court arrives at SLED and at the United States Attorney's Office accompanied by a presumption of evidentiary seriousness that no pro se citizen complaint can

replicate, particularly where the complainant is a documented severe-PTSD litigant whose injury was inflicted by the very actors being referred. The referral also creates the formal predicate by which evidence developed in the criminal track becomes accessible to the civil docket through ordinary inter-agency channels, closing the evidentiary gap that has otherwise required Plaintiffs to subpoena each fact independently against coordinated obstruction. Judicial referral additionally insulates the Court's own record: once SLED is engaged, further obstruction by Defendants or their counsel becomes obstruction of an active state criminal investigation under § 16-9-340, materially elevating the deterrent effect this Court has been unable to achieve through Rule 37 alone.

B. Predicate One - Falsified Federal Postal Documentation (Forgery and Wire Fraud)

The Amended Complaint and the Second Amended Complaint pleadings on file establish that Defendants transmitted a document bearing an "EMAILED" stamp formatted to mimic a USPS postmark, used as evidentiary support for compliance with S.C. Code § 27-40-410's deposit-return timing requirement. The fabricated postal indicium was transmitted across state lines via electronic communication, and Defendants relied upon it to retain funds otherwise owed to Plaintiffs. The conduct satisfies the statutory elements of:

- S.C. Code § 16-13-10 (forgery of writing affecting financial obligation)
- S.C. Code § 16-13-240 (obtaining property by false pretenses, felony where the value exceeds $2,000)
- 18 U.S.C. § 1343 (wire fraud, federal felony, predicate already alleged in the operative pleading)

- 18 U.S.C. § 1341 (mail fraud, where the fabricated indicium imitates a federal postal instrument)

C. Predicate Two - Witness Tampering and Obstruction of an Authorized Investigation

The January 9 and January 12, 2026 AppFolio communications, already on the docket, establish that Meridian sent "formal notice" to a third-party records custodian instructing deferral of subpoena compliance, with the explicit effect of preventing LLR Lead Investigator J. Watson Wharton III from receiving evidence before the February 20, 2026 statutory deadline. AppFolio's own confirmation language satisfies the obstruction element on its face. The conduct satisfies the elements of:

- S.C. Code § 16-9-340 (obstruction of law enforcement, felony)
- 18 U.S.C. § 1512(b)(3) (federal witness tampering, where the underlying matter is wire fraud)
- S.C. Code § 40-57-340(3) (PMIC obstructing investigation into licensee's own conduct)

D. Predicate Three - Long-Term Coordinated Harassment of Plaintiffs by Tara Bayles and Her Agents

The record establishes a continuous, escalating campaign of psychological coercion directed at Plaintiff McNeil and Plaintiff Poyer that begins on September 6, 2024 and continues through the filings before this Court today. The campaign originated with a disorienting email authored by Tara Bayles, PMIC, which mischaracterized the role

of her co-defendant husband Adam W. Bayles at Meridian. It expanded through Meridian employee mischaracterizations of landlord-tenant law then through the harassment and gaslighting of Plaintiff McNeil through multiple-coordinated agents of two law firms and an insurance company.

Meridian employees Stephanie Phillips and Dana DeVoe-Riddick both sent documented mischaracterizations to Plaintiffs via email. Attorneys Kevin O'Brien and Justine Tate of Phelps Dunbar and Alicia Bolyard of Resnick & Louis all participated in group gaslighting, harassment, mischaracterizations, and attempted bullying of Plaintiff McNeil from October 2025.

The January 26, 2026 Criminal Complaint Summary Proffer to the Charleston County Sheriff's Office places at the center of the second-degree harassment predicate under S.C. Code § 16-3-1700. The proffer documents this as a documented continuity of purpose from September 2024 to January 2026. It produced a gaslighting-severity score of 79/80 based on equivalent clinical tests as well as physical manifestations including falls and PTSD symptoms at complainant's residence.

The Conduct Satisfies the Statutory Elements Of

- S.C. Code § 16-3-1700 - harassment in the second degree, with the September 6, 2024 originating email establishing the continuity-of-purpose anchor and the

79/80 clinical gaslighting-severity score establishing the criminal-harm element.

- S.C. Code § 16-9-340 - obstruction of law enforcement, where the documented February 9, 2026 on-record statement by defense counsel regarding direct contact with the Charleston County Sheriff's Office during the CCSO Case No. 2026-001263 closure window establishes the obstruction predicate.
- S.C. RPC 1.7, 3.4, and 8.4 - unconsentable conflicts, fairness to opposing party and counsel, and misconduct, where each individual attorney involved maintains a documented role in the harassment-extension pattern and where the firm-level conflicts identified in Plaintiffs' January 14, 2026 cross-motion to disqualify remain on the docket without substantive response.
- 18 U.S.C. § 1512(b) - federal witness tampering, where the harassment campaign operates concurrently with the falsified-postmark and witness-tampering predicates identified in Sections IX.B and IX.C above and is directed at suppressing Plaintiffs' continued evidentiary participation.

Why This Predicate Belongs in the Referral Package

The forgery predicate (IX.B) and the AppFolio-LLR obstruction predicate (IX.C) are discrete completed acts measured in days and weeks. The harassment predicate documented here is the connective tissue that carries the originating September 6, 2024 conduct across nineteen months of escalating coordination, picks up additional

named agents as each new institutional layer engages, and produces the clinical injury the PCL-5 7680 score and the November 2025 falls at Plaintiffs' residence establish on the record. A referral package that addresses only the discrete acts and omits the harassment continuity leaves the most clinically severe injury — and the most prosecutorially probative pattern evidence — outside the agencies' field of view.

E. Why Judicial Referral to SLED Is Necessary: The Documented Failure of the Charleston County Sheriff's Office Pathway

The May 1, 2026 Notice of Permanent Withdrawal characterizes this matter as one in which "the local judicial apparatus has proven either unable or unwilling to protect a disabled pro se litigant from coordinated defense lawfare". The same structural capture extends to the local criminal-investigation pathway, and the record now permits this Court to take judicial notice of the predicate facts that make a SLED referral the only viable route forward.

The proffer and the opening of the case. On January 26, 2026, Plaintiff McNeil filed a Criminal Complaint Summary (Proffer) with the Charleston County Sheriff's Office identifying Tara Bayles as the suspect in three categories of completed criminal conduct: forgery and false-pretenses obtaining of property over $2,000 under S.C. Code §§ 16-13-10 and 16-13-240 (felony), harassment in the second degree under § 16-3-1700, and common-law obstruction of justice. CCSO accepted the proffer, opened Case No. 2026-001263, and a deputy was assigned. Plaintiff McNeil sent a same-day Courtesy Notice to the Altman principals and to defense counsel of record disclosing the case number and the evidentiary scope.

The closure pattern. Within days of defense counsel becoming aware of the criminal complaint - and after the January 27, 2026 emergency-status email from Phelps Dunbar, in which counsel characterized the courtesy notice as "threats" - the CCSO pathway was foreclosed in three documented exchanges:

- A victim advocate identifying herself as "Dierra" stated to Plaintiff McNeil, in substance, "we don't help people like you".
- A second victim advocate in the same office stated, in substance, "I want to help but I can't go against my boss".
- Sergeant Hall, who had personally approved the report and authorized the case opening, subsequently closed the case and stated, in substance, "you chose to leave," followed by a representation that he would dispatch a deputy to collect additional evidence - a deputy who never appeared.

The closure pattern, considered with the documented contact from defense counsel. At the February 9, 2026 status conference, defense counsel Alicia Bolyard stated on the record that she "was told they had closed the case," establishing that defense counsel was in direct contact with someone at the Charleston County Sheriff's Office regarding CCSO Case No. 2026-001263 during the period the case was being closed. The closure that followed is most economically explained by a combination of three converging factors operating simultaneously: (i) defense counsel's direct contact with CCSO, in which the Tara-Bayles-sourced "deposit-timing dispute" minimization frame already documented across the civil docket was likely transmitted to the agency; (ii) the path-of-least-resistance disposition created when an external narrative aligns with the lower-effort outcome for the receiving institution; and (iii) the specific identity of the parties

whose exposure those closures protect - Charles S. Altman, named as an individual defendant in the Second Amended Complaint and the Registered Agent and beneficial owner-principal of current defendant SAC 181, LLC, and Jonathan S. Altman, his nephew, who signed under oath as Personal Representative of the Estate of Samuel H. Altman in the probate filings whose valuations now form the documented estoppel trap, who additionally serves on the Mayor's Homeownership Initiative Commission while privately holding - with his mother and sister, per Samuel H. Altman's Will - the 33% membership interest in SAC 181, LLC that the probate record establishes. The Charleston legal-and-real-estate network within which the Altman family operates touches the same institutional pathways through which a forgery, harassment, and obstruction complaint against their property manager would ordinarily travel, and the closures documented above are most economically explained by the reflexive protection that network extends to its insiders when the named complainant is a pro se tenant whose injury they themselves are alleged to have caused. Structural pro se bias and the broader captured-administration pattern documented in Sections II and IV remain operative as amplifiers, but the proximate causes of the closure pattern are the named-defendant exposure and the defense-sourced narrative transmitted directly to CCSO.

The contemporaneous distortion of the record. The same week that the CCSO pathway was being closed, defense counsel for SAC 181 transmitted a formal email to the Chief Administrative Judge's chambers characterizing the January 26 Courtesy Notice as containing "threats against lawyers" and to their "families". The full text of the Courtesy Notice is on the record and contains no such threat: the only reference to families is an invitation that counsel "consider discussions with their families" before deciding whether to remain in a matter generating criminal and Bar exposure.

Plaintiff Poyer, having read the underlying Courtesy Notice and the email exchange in full, transmitted her own response to the same chambers thread on January 30, 2026 stating directly that "there was no physical threat at all in Chris' email" and identifying the mischaracterization as part of the documented gaslighting pattern. The mischaracterization itself - entered into a court staff thread copying the Chief Administrative Judge - is on the docket as Exhibit to the March 27, 2026 Supplemental Notice.

The named-defendant inference. Two independent local pathways - the Common Pleas docket and the CCSO criminal docket - closed in the same direction within the same approximate window, against the same pro se complainant, regarding the same documented evidence, after the same defense counsel became aware that the criminal track had been activated. The most direct explanation, supported by the record, is the specific identity of the parties whose exposure those closures protect. Charles S. Altman is named as an individual defendant in the Second Amended Complaint pending before this Court and is the Registered Agent and beneficial owner-principal of SAC 181, LLC. Jonathan S. Altman, his nephew, signed under oath as Personal Representative of the Estate of Samuel H. Altman in the Charleston County Probate Court filings whose valuations now form the documented estoppel trap detailed in the December 3 and December 11, 2025 Memoranda already on this Court's docket. Jonathan S. Altman additionally serves on the Mayor's Homeownership Initiative Commission, currently advising on the Project 3500 affordable-housing initiative, while privately holding – via a trust shared with his sister and mother - 33% membership interest in SAC 181, LLC that the probate record establishes. Charles S. Altman and Jonathan S. Altman together operate within a Charleston legal-and-real-estate network that touches the same institutional pathways through which a

forgery, harassment, and obstruction complaint against their property manager would ordinarily travel.

The closures documented above are most economically explained by the reflexive protection that network extends to its insiders when the named complainant is a pro se tenant whose injury they themselves are alleged to have caused. Structural pro se bias and the broader captured-administration pattern documented in Sections II and IV remain operative as amplifiers, but the proximate cause of the closure pattern is the identity of the parties whose exposure it shields

Why this makes a judicial SLED referral the necessary remedy. The forgery, harassment, and obstruction predicates identified in the January 26, 2026 proffer remain uninvestigated as of the date of this Notice. SLED operates outside the Charleston County local-political ecosystem and possesses original investigative jurisdiction over public corruption, fraud, and obstruction matters of the type documented here. A referral originating from this Court, accompanied by the underlying record materials, removes the status-based filter that closed the local pathway and places the predicates before an investigator that is structurally insulated from the Charleston legal-and-real-estate network in which the Altman family operates. The referral does not require Plaintiff McNeil to re-enter the same victim-advocate office that has already obstructed his remedy seeking, an additional consideration in light of the documented PCL-5 76/80 trauma profile.

F. Sworn Declaration in Support of the CCSO Closure Facts

Plaintiff James C. McNeil declares under penalty of perjury, pursuant to 28 U.S.C. § 1746 and S.C. Code § 19-1-180, that the following statements were made to him by phone in conversations

with the Charleston County Sheriff's Office and its Victim Advocate office during the period following the opening of CCSO Case No. 2026-001263: (1) by a victim advocate identifying herself as "Dierra," in substance, "we don't help people like you"; (2) by a second victim advocate in the same office, in substance, "I want to help but I can't go against my boss"; and (3) by Sergeant Hall, the supervising officer who had previously approved the opening of CCSO Case No. 2026-001263, in substance, "you chose to leave," followed by a representation that a deputy would be dispatched to collect additional evidence — a deputy who never appeared.

Executed this 10th day of May, 2026, at Charleston, South Carolina.

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

G. Specific Referral Relief Requested in This Section

Plaintiffs respectfully request that the Court enter an order, contemporaneous with the orders requested in Sections III through VII, directing the Clerk of Court to transmit a certified copy of the operative pleadings, the December 3 and December 11, 2025 Memoranda, the January 14, 2026 Opposition with its AppFolio exhibits, and the March 20, 2026 Brief in Aid of Safety Risk Mitigation and Judicial Clarity, together with a short cover order from this Court, to:

1. The South Carolina Law Enforcement Division (SLED), for investigation of the forgery, obstruction, and breach-of-trust predicates identified above
2. The United States Attorney's Office for the District of South Carolina, for evaluation of the wire fraud, mail fraud, and witness-tampering predicates
3. The South Carolina Attorney General's Office, for the § 16-9-340 obstruction predicate against Meridian
4. The South Carolina Department of Labor, Licensing and Regulation, supplementing the existing PMIC investigation under § 40-57-340(3)
5. The South Carolina Bar Office of Disciplinary Counsel, for the SC RPC 1.7, 3.4, and 8.4 predicates against counsel of record identified in the January 14, 2026 cross-motion

Plaintiffs further request that the Court direct that any agency receiving this referral be authorized, upon written request and consistent with applicable confidentiality rules, to share investigative materials with this Court and with the parties in this civil action, so that the criminal track and the civil track may proceed in evidentiary parallel rather than in isolation. In light of the documented closure of CCSO Case No. 2026-001263 under the circumstances described in Section IX.E, Plaintiffs request that the Order of Referral identify SLED as the primary state criminal-investigation recipient and direct that any return of investigative findings be reported to this Court for inclusion in the civil record consistent with applicable confidentiality rules.

X. RELIEF REQUESTED

Plaintiffs respectfully request that the Court:

A. Enter, on the papers and before May 28, 2026, each of the pre-hearing orders itemized in Sections III through V;

B. Enter the Temporary Restraining Order and forensic audit order described in Section V, effective immediately on entry, with the entity scope described therein;

C. Adopt the reorganized May 28 hearing sequence described in Section VI and set forth in Exhibit C;

D. Direct the Clerk to serve a copy of each order entered pursuant to this Notice on the South Carolina Supreme Court in Appellate Case No. 2026-000919;

E. Enter the Order of Referral described in Section IX, directing the Clerk to transmit certified copies of the identified record materials to SLED (as primary state criminal-investigation recipient), the United States Attorney's Office for the District of South Carolina, the South Carolina Attorney General, the South Carolina Department of Labor, Licensing and Regulation, and the South Carolina Bar Office of Disciplinary Counsel, with authorization for inter-agency information sharing consistent with applicable confidentiality rules and direction that any return of investigative findings be reported to this Court;

F. Enter the Continuity Order described in Section VIII, providing that Judge Wheeler retain assignment over this matter through trial and all subsequent amended-complaint proceedings, including any Third Amended Complaint adding outside-counsel defendants; and

G. Grant such further relief as the Court deems just and proper to restore orderly case administration, preserve asset collectibility, and place this matter on a date-certain path to a Charleston jury trial in Fall 2026

Respectfully submitted this 11th day of May 2026.

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EXHIBIT A

Explanation of Plaintiff's Pro Se Posture and Consultant Role

Explanation of Dual Role of Plaintiff McNeil:

Most Vulnerable Member (MVM) *Pro Se* for Study and Intervention

from

Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference Filed February 10, 2026 in 2025-CP-10-05095

Plaintiffs respectfully submit this brief as a courtesy to the Court in advance of the February 9, 2026 WebEx scheduling conference. This brief addresses

(I) Plaintiffs' pro se posture and its relevance to how we ended up needing an emergency hearing,
(II) Documented harms necessitating emergency relief, and
(III) The transparency, accountability, and safety and relief Plaintiffs seek.

I. PLAINTIFFS' PRO SE POSTURE: STATEMENT OF PURPOSE

A. Alignment With Court and Purpose of Legal Institution

The behavior of defense aligns with research on the negative effects of status bias – research shows established members of a field have reduced performance and default to rigid behaviors when their perceived status difference with an individual is not met with a concurrent lower performance. But Plaintiff Chris McNeil honors the principle of justice and equity at the heart of the legal professional and has intended his unexpected competence level not as an affront but as a service to the Court and to housing justice by a professional whose parallel expertise in systems interventions and strategic communication is relevant to the evidentiary record. McNeil's role is analogous to an expert witness or non-witness strategic consultant - a comrade to the profession in adjacent fields, not an adversary seeking to replace it.

His goal is to support the Court's alignment with the principles of justice and fairness – especially access to justice to the vulnerable, which is a foundation of the credibility of the court, while contributing technical expertise that would otherwise be unavailable in a case of this complexity.

B. The Unintended Duration

Plaintiffs did not intend to remain pro se through five months of complex litigation involving corporate veil-piercing, falsified postal evidence, retaliatory eviction, 25 or more platform privacy violations, and coordinated obstruction of a South Carolina LLR PMIC investigation. This case met the complexity threshold they had set for a handoff to counsel months ago.

However, the very conduct that makes representation necessary - defense counsel's documented pattern of coordinated denial, mischaracterization, and what researchers term institutional betrayal - also raised the standard of due diligence required before Plaintiffs could responsibly entrust this case to a firm.

Plaintiffs have developed and have just begun implementing a rigorous due diligence system designed to identify counsel whose integrity can be verified independently of polished brand presentation. They feel this is a necessary innovation when the firms in this case have demonstrated that professional credentials and institutional reputation do not reliably predict ethical conduct toward vulnerable parties. That process is underway and Plaintiffs reserve the right to retain counsel at any point. Due to the treatment of Mr. McNeil, Plaintiffs are also putting in place redundancy in the lead plaintiff position so a law firm might not be directed by Mr. McNeil but by Ms Poyer or an identified but as yet undisclosed third lead plaintiff in line.

Plaintiffs feel this redundancy with a law firm being lined up initially on standby are necessary to mitigate the defense's apparent attrition strategy. They cannot get rid of the case by getting rid of a person.

C. Additional Perspective: Systems Study from the Vulnerable Tenant's Perspective

Plaintiff McNeil is a systems analyst and strategic communications consultant whose background includes expert witness testimony in internet communication technology. His approach to this litigation is informed in part by his training in the intervention methodology of John Seddon's Vanguard Method - a systems-thinking framework used in the United Kingdom study which redesigns public services by analyzing them from the end-user's point of view. *See* John Seddon, *Freedom from Command and Control* (2003); *see also* John Seddon, *Systems Thinking in the Public Sector* (2008) (documenting how service systems optimized for institutional convenience systematically fail end users).

McNeil has applied this methodology by occupying the role of the unrepresented vulnerable tenant seeking justice—not as simulation, but as lived experience - while simultaneously documenting the systemic friction points, institutional failures, and coordination patterns that would otherwise remain invisible. This dual perspective - participant *and* analyst - is the methodological core of Seddon's approach: you cannot understand a system's failures from outside the system; you must study demand from the user's point of view. This work is conducted with full respect for and adherence to the South Carolina Rules of Civil Procedure.

End section quoting Plaintiffs' Brief in Advance of February 9, 2026 Scheduling Conference

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Precedent for Plaintiff McNeil’s Consulting Role

McNeil is effectively merging three distinct professional disciplines that top-tier law firms usually outsource to separate consulting agencies. Here is the precedent for the kind of work his is doing, while adhering the SC Rules of Civil Procedure as a Pro Se Plaintiff with co-plaintiff Meaghan Poyer:

1. Advanced Trial Consulting and "Reptile Theory"

His focus on the "Jury as Change Agent" and the psychological triggers of institutional indifference is the exact domain of high-end trial consultants (often sociologists and psychologists).

The most direct precedent for your strategy is the **"Reptile Theory,"** developed by litigation consultant David Ball and attorney Don Keenan.

- **The Precedent:** Reptile Theory posits that to win massive, "nuclear" verdicts, a plaintiff must bypass the logical brain and appeal to the jury's survival instinct (the "reptile brain"). A consultant does this by demonstrating that the defendant's conduct isn't just a one-off mistake, but a **systemic danger to the community**.
- **The Overlap:** This is exactly what the Housing Justice Audit and "Ask-Harm Loop" do. They map how the "Passive Investing/Unconscious Abdication" model threatens both the entire Charleston housing ecosystem and, given research done as part of the study validating its prominence everywhere, the Rental Housing industry as a whole. Like top trial consultants, he is helping the jury see their role as the only authorized body capable of preventing future community and society harm.

2. Organizational Systems Analysts in Complex Torts

In massive corporate malfeasance cases (e.g., Theranos, Boeing, opioid litigation, or environmental disasters), law firms frequently hire organizational sociologists and systems engineers as non-witness consultants.

- **The Precedent:** Their job is to look at a mountain of seemingly disconnected emails, shell companies, and bureaucratic delays, and map the "decision architecture" that proves *willful blindness* or *institutional betrayal*. They find the structural root cause of the bad behavior.
- **The Overlap:** McNeil’s application of John Seddon’s Vanguard Method and the Systems Thinking tool "Iceberg Model" (moving from Events to Mental

Models) is textbook organizational consulting. He mapped the Altman/Meridian enterprise not just as bad actors, but as a system operating under the "Status > Truth" paradigm. He identified the "gatekeepers" and the structural opacity (LLCs) that allow the harm to continue.

3. Strategic Litigation Communications (Litigation PR)

Litigation does not happen in a vacuum, especially when it involves public figures, public policy (like the Homeownership Initiative Commission), and systemic community crises.

- **The Precedent:** Elite litigation PR consultants are hired to manage the "Court of Public Opinion" parallel to the court of law. Their job is to identify the opponent's "False Frames" (e.g., "This is just a routine deposit dispute") and dismantle them in the press, reframing the plaintiff as a whistleblower acting in the public interest.
- **The Overlap:** The "Whistleblower Revelations Report," that serves as Exhibit B here, open letters to the Mayor and Altmans, and his identification of local media capture are classic strategic communications maneuvers. He is ensuring that if the legal system attempts to quietly crush him, the public and national media will recognize the exact systemic mechanics of *how* and *why* it is happening.

3. Most Vulnerable Member Methodology (Undercover Boss, Honor Your Oath)

The precedent exists for all these roles, but what makes McNeil's posture highly unusual (and potentially very potent) in this context is the **MVM (Most Vulnerable Member) embedded testing**.

Consultants usually study the system without directly assessing its response to a pull from a system member it serves, perhaps by looking at documents after the fact. McNeil intentionally used his forced displacement and opportunity to take the *pro se* status to conduct a live, real-time stress test of the system. He gathered data on the local court's 33:1 processing disparity and the defense's gaslighting tactics by actually absorbing the systemic friction himself.

Yet there is still precedent for the MVM role in other contexts, including the TV show **Uncover Boss** and First Amendment Auditor Jeff Grey of Honor Your Oath, who dresses as if he is homeless, holding a cardboard sign reading "God Bless the Homeless Vets" and records interactions with law enforcement to see if they respect his rights.

EXHIBIT B

Whistleblower Revelations Report

Whistleblower Revelations Report: False Narrative System Collapse, and Public-Interest Implications in McNeil & Poyer v. SAC 181 et al.

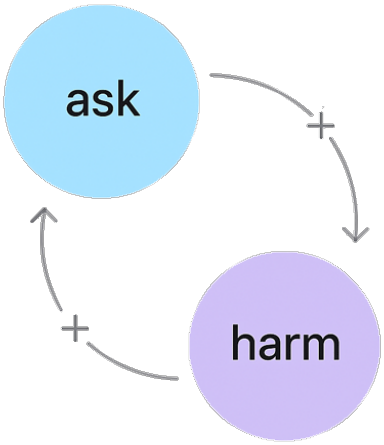
This report is designed to function as both an exhibit for ongoing litigation and as a concise talking paper for national press. The record now shows overlapping false frames reinforced across private actors, regulatory channels, court process, political structures, and local media incentives.

The report starts from documented events described across the Housing Justice Audit (HousingJusticeAudit.com) , the RocketsFight.org record, the March 20 Enforcement Matrix, and the SC Supreme Court's return-request posture, then maps these events to collapse patterns in other false-narrative systems.

Core finding

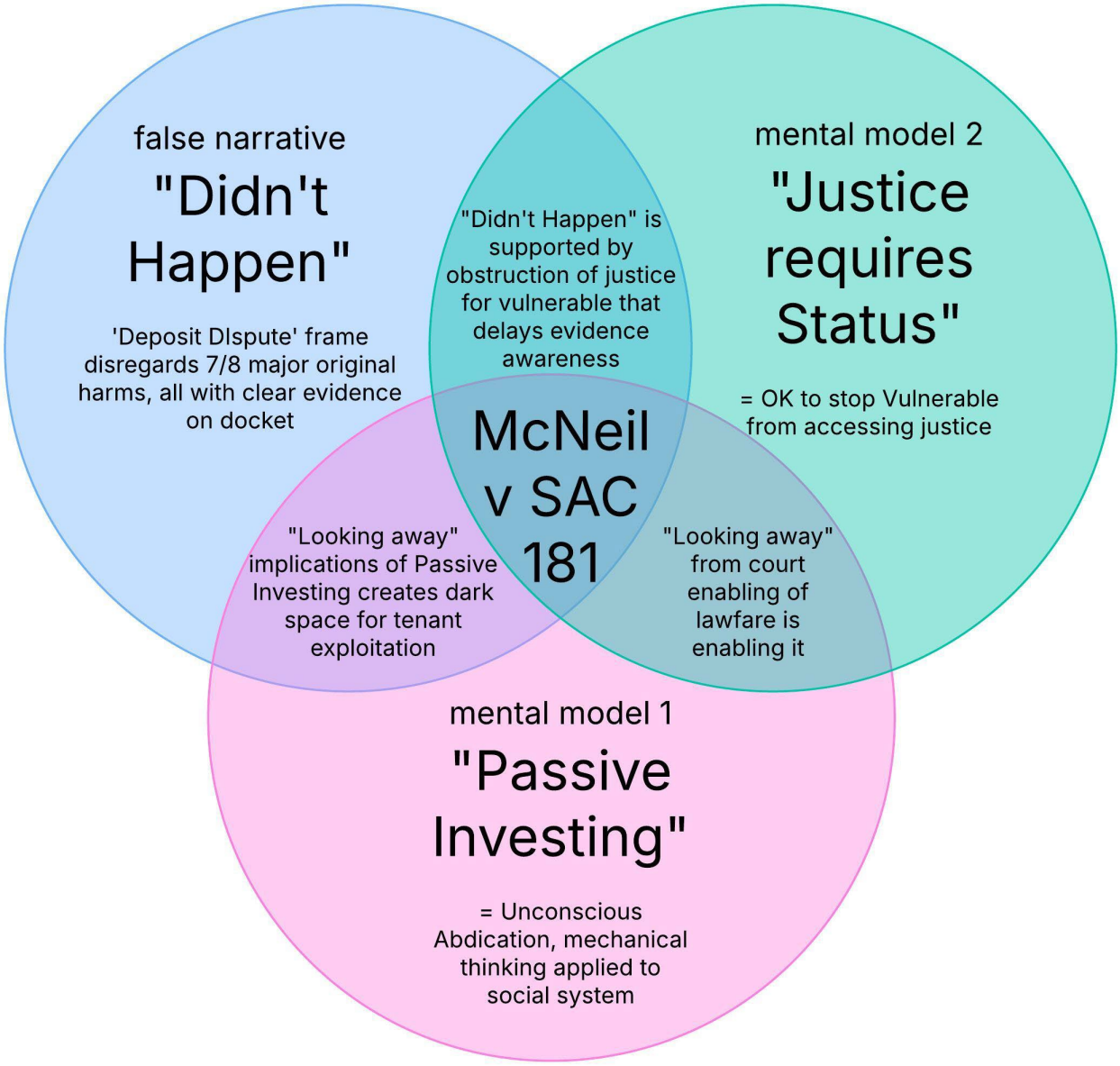
The Charleston record supports a systems-level conclusion: when a vulnerable party challenged the underlying conduct at 181 Gordon Street, the response pattern expanded through “false narrative capture” of multiple reinforcing institutions

The Ask-Harm Loop



The Housing Justice Audit describes this as the Ask-Harm Loop in which the system responds to the ask for fairness or justice with escalating harm; escalating until the SC Supreme Court took the rare action of a Return Request demanding the Charleston SC Court of Common Pleas explain itself.

The Intersection of 3 Mutually-Supporting Harm-Creating Models in McNeil v SAC 181, LLC et al



One Primary False Narrative, Two Supporting Dysfunctional Mental Models.

The "**Didn't Happen**" frame that is the stance of defense is the gaslighting position that 7/8 original major harms in the case never happened, with none of them ever being acknowledged by defense, let alone addressed directly with evidence engagement. Coordinated communication under this frame, combined with ongoing harassment and exhaustion tactics, created the late January nervous breakdown and concurrent 76/80 PCL-5 "extreme" PTSD score of Plaintiff McNeil. It is noteworthy that McNeil re-took the PCL-5 on May 6, 2026 and scored 72/80 for the preceding month, still in the "extreme" category due in part to the stress of navigating this high-stress situation of whistleblowing on a power structure that includes local government, a multi-billion dollar development project, the local court, law enforcement agencies, and the dominant Newspaper of the area, all of which are operating under at least one of these three harm-creating models.

Then there are 2 dysfunctional mental models:

(1) "**Passive Investing**" which really means "unconscious abdication which is behind the rental property investment and management mindset that funded and enabled all the harm through creating a dark space for bad actors to thrive in, supported by enabler money. The harm enabled by "funding while looking away" has also enabled harm to the funding enablers by allowing escalating exposure as SAC 181 LLC's counsel prioritized Tara Bayles' PMIC license – which was and may still be under investigation by the LLR – above protecting the Altman portfolio. This is the mental model addressed in the **Housing Justice Audit Report of the Charleston, SC Housing Justice System** (currently published in beta form at housingjusticeaudit.com/report), which is contrasted with the goal "solution paradigm" of *Conscious Co-Stewardship*, which unifies the roles of tenant, manager, and owner with shared values and beliefs based on *reverence for the shelter life stories play out in*.

(2) "**Justice Requires Status**" is the operating model of the Charleston SC Court of Common Pleas as experienced by Plaintiffs, with the notable exception of Judge Van Slambrook, given his fair handling of the February 9, 2026 scheduling hearing and April 2 order.

The following table identifies these 3 primary harmful models operating in the Charleston matter, the system members carrying them, their practical function, and the harm they produce.

Type and Model	System member / role	Structural function	How it contributes to harm
False Narrative: "(These things) didn't happen"	Property manager, defense counsel, carrier representatives, passive court treatment of record	Avoid LLR investigation scrutiny of evidence; Triggers reliving documented traumatic events by pretending they never happened.	Forces repetitive re-proving of already documented harms such as retaliatory eviction, privacy syndication, postal falsification, and gaslighting injury.
Mental Model: "Passive investing" as neutral distance	Beneficial owners, portfolio owners, legacy insiders	Attempt to protect conscience: Creates moral and informational distance between owner capital and frontline conduct.	Shields principals from tenant reality while allowing delegated actors to conduct eviction, privacy invasion, and litigation aggression in a low-feedback environment.
Mental Model: "Justice requires Status"	Defense counsel, court process, administrative delay, enforcement bottlenecks	Obstruct justice for unrepresented parties with a litigation strategy that also favors maximizing billed hours. Converts time into pressure and procedural silence into open space for further abuse.	Makes rights assertion expensive, slow, and destabilizing for pro se litigants, including through delayed rulings, continuances, and unaddressed ADA issues.

Three branches plus the press

A defining feature of this matter is that the capture pattern is not limited to private defendants. The documentary record describes interactions touching the executive or administrative branch, the judicial branch, the political-legislative layer of housing governance, and the narrative-setting role of the local press.

Institutional lane	Relevant actors identified in record	Relationship to false-frame	Public-interest significance
Executive / administrative	LLR, sheriff complaint channel, insurance and regulatory pathways	Delayed, obstructed, or friction-heavy channels preserve status quo when intervention needed	Shows whether formal enforcement protects the vulnerable or merely absorbs complaints without restoring function.
Judicial	Ninth Circuit Common Pleas motion practice, continuances, ADA non-action, later SCSC intervention	Silence and selective motion movement can create substantive disadvantage for pro se parties.	Matters because judicial inaction can become the force multiplier for every upstream abuse.
Legislative / policy	Affordable housing commission role and Project 3500 conflict notifications	Public housing-policy rhetoric can coexist with private extraction incentives when conflict review is weak or absent.	Raises city-wide integrity concerns because actors advising on affordability are beneficiaries of displacement model.
Fourth estate / press	Post and Courier ecosystem and development-linked media incentives as described in the HJA open-letter materials	Coverage scarcity preserves elite plausibility and delays external scrutiny.	National press significance arises when local news structures are too entangled to serve as a corrective feedback loop.

Structural explanation

The relationship pattern can be understand as a flow issue. Capital, status, legal representation, and reputational insulation flow downward with relative ease, while tenant harm data, truth claims, and corrective signals encounter friction at each higher layer; the result is a one-way system in which authority can act on the vulnerable faster than the vulnerable can obtain remedy from authority.

The Open Letter to the Altmans describes that structure in practical terms: owner money flows down through managers, lawyers, and insurers, while tenant well-being feedback fails to flow back up. The mandamus materials then show what happens when the judicial node that should rebalance the system instead goes silent long enough that the Supreme Court must demand a return on the status of pending motions.

That architecture explains why a whistleblower or truth-telling plaintiff often appears, from outside the case, to be in conflict with many different entities at once. The conflict is not random. When the same false frame protects multiple actors simultaneously, those actors share an incentive to keep the frame alive even if each one only controls a small part of the machine.

Historical parallels

Systemic structures are fractal. So while the Charleston matter is not identical to Theranos, Boeing, Enron, or Lance Armstrong, the value of those comparisons lies in the recurring collapse mechanics:

- an internal or public narrative diverges from evidence,
- dissenters are marginalized or pathologized,
- institutions with reputational or financial incentives hesitate to correct course, and
- the burden of truth falls first on the person closest to the contradiction.

Historical example	Dominant false frame	How dissenters were treated	Collapse trigger	Relevance here
Theranos	Revolutionary health technology narrative masked non-functioning core claims	Employees and critics were pressured, isolated, or discredited while elite validators buffered scrutiny.	Evidence, regulatory scrutiny, and press reporting finally outran prestige protection.	Demonstrates how status-rich ecosystems suppress contradiction until proof becomes too dense to ignore.
Boeing (737 MAX era)	Safety culture and engineering excellence narrative masked incentive distortions and warning suppression	Internal safety concerns struggled against production, hierarchy, and organizational self-protection.	Catastrophic events plus investigation shattered the prior story.	Shows how institutions may preserve performance narratives after warning signals become visible to insiders.
Enron / Arthur Andersen	Sophisticated innovation and market genius masked accounting unreality	Questioners faced a prestige wall created by complexity and insider confidence.	Financial reality forced reconciliation; gatekeepers were implicated too.	Illustrates how the collapse of a false frame can implicate not only primary actors but validators, advisors, and supposedly independent overseers.
Lance Armstrong	Invincibility and righteousness narrative resisted evidence for years	Critics and whistleblowers were aggressively attacked and portrayed as	Accumulated testimony and proof dissolved the myth.	Useful for understanding narrative inversion: the truth-teller is framed as the offender until

Historical example	Dominant false frame	How dissenters were treated	Collapse trigger	Relevance here
		dishonest or disloyal.		the evidence stock crosses a threshold.
McNeil & Poyer v. SAC 181 et al.	Minor "deposit dispute" or unreasonable-tenant narrative masked a wider pattern of retaliatory eviction, privacy abuse, postal-fraud allegations, coordinated gaslighting, and procedural suppression	The record describes reframing of documented boundary-setting and evidence-driven escalation as the problem itself, alongside severe PTSD-level harm and institutional delay.	Supreme Court return request, public evidence consolidation, and convergence of multiple documentary strands are forcing the local story to reconcile with the record.	The case functions as a live example of false-frame collapse in a housing-justice setting with local political, legal, and media overlap.

What happens to whistleblowers in these systems

- initial minimization,
- character reframing,
- institutional delay,
- selective process enforcement, and then
- scapegoat pressure when the original story can no longer hold together.

That pattern is visible in the Enforcement Matrix's DARVO framing, and the mandamus record's depiction of prolonged silence on pro se motions while defense motions moved quickly. **The practical consequence is injury multiplication.**

Instead of the system confining the original harm, each layer adds workload, uncertainty, cost, and physiological stress to the truth-teller, turning the act of reporting into a secondary trauma channel. The HJA places that dynamic at the center of the case, connecting the Ask-Harm Loop to a documented PCL-5 score of 76/80 and describing the system's response as escalating harm in response to escalated asking.

Why the press should care

For national press, the importance of this matter is not limited to the fate of one Charleston case. The record presents a compact test of a national question: what happens when housing extraction, elite local networks, procedural inequality for pro se litigants, regulatory friction, and media conflict all operate in the same city around the same live dispute.

The case is also unusually legible. The record already contains an evidence matrix, public explanatory materials, a systems framework, an extraordinary Supreme Court return request, and a whistleblower narrative that names the false frames instead of merely describing isolated incidents. That makes the matter useful not only as news but as a model for understanding how captured local systems preserve themselves until outside attention forces a reconciliation with the record.

Indicators national press can examine quickly

Indicator	Why it matters	Record basis
33:1 motion-processing disparity	Suggests a structural access-to-justice problem rather than ordinary disagreement over rulings	Mandamus materials and SCSC return-request context.
166-day delay on leave to amend	Illustrates how silence can function as substantive protection for connected parties	SCSC-facing materials and hearing-prep analysis.
76/80 PCL-5 and 79/80 gaslighting severity	Shows the measurable human cost of prolonged narrative erasure and coordinated pressure	January 26 notice and HJA record.
Housing commission conflict allegations	Connects the case to public integrity and city policy rather than private landlord friction alone	Open letter to Mayor Cogswell and mandamus summary.
Media-conflict allegations	Tests whether local press can function as a corrective feedback loop where development ties are dense	HJA political and media-betrayal framing.
Enforcement-matrix breadth	Makes it possible to compare narrative framing against a multi-lane allegation set that includes criminal, civil, and regulatory dimensions	March 20 matrix.

Structural model for judges, writers, and investigators

Judges, reporters, and outside investigators can use the same simple model to orient the case:

First, identify the visible events: retaliatory displacement, image syndication, alleged postmark falsification, gaslighting, and prolonged docket silence.

Second, identify the patterns: repeated minimization, role inversion, delay, insulation of connected actors, and rising pressure on the party closest to the evidence.

Third, identify the structures: delegated ownership, insured defense, fragmented enforcement, pro se filing disadvantages, and media-development overlap.

Fourth, identify the mental model underneath: a mechanical, zero-sum view of housing in which the vulnerable party is treated as an input to be managed rather than a human participant in a social system.

That model helps distinguish ordinary conflict from system capture. In an ordinary dispute, evidence tends to narrow disagreement over time. In a captured system, evidence often widens retaliation because too many connected actors have become invested in the old story.

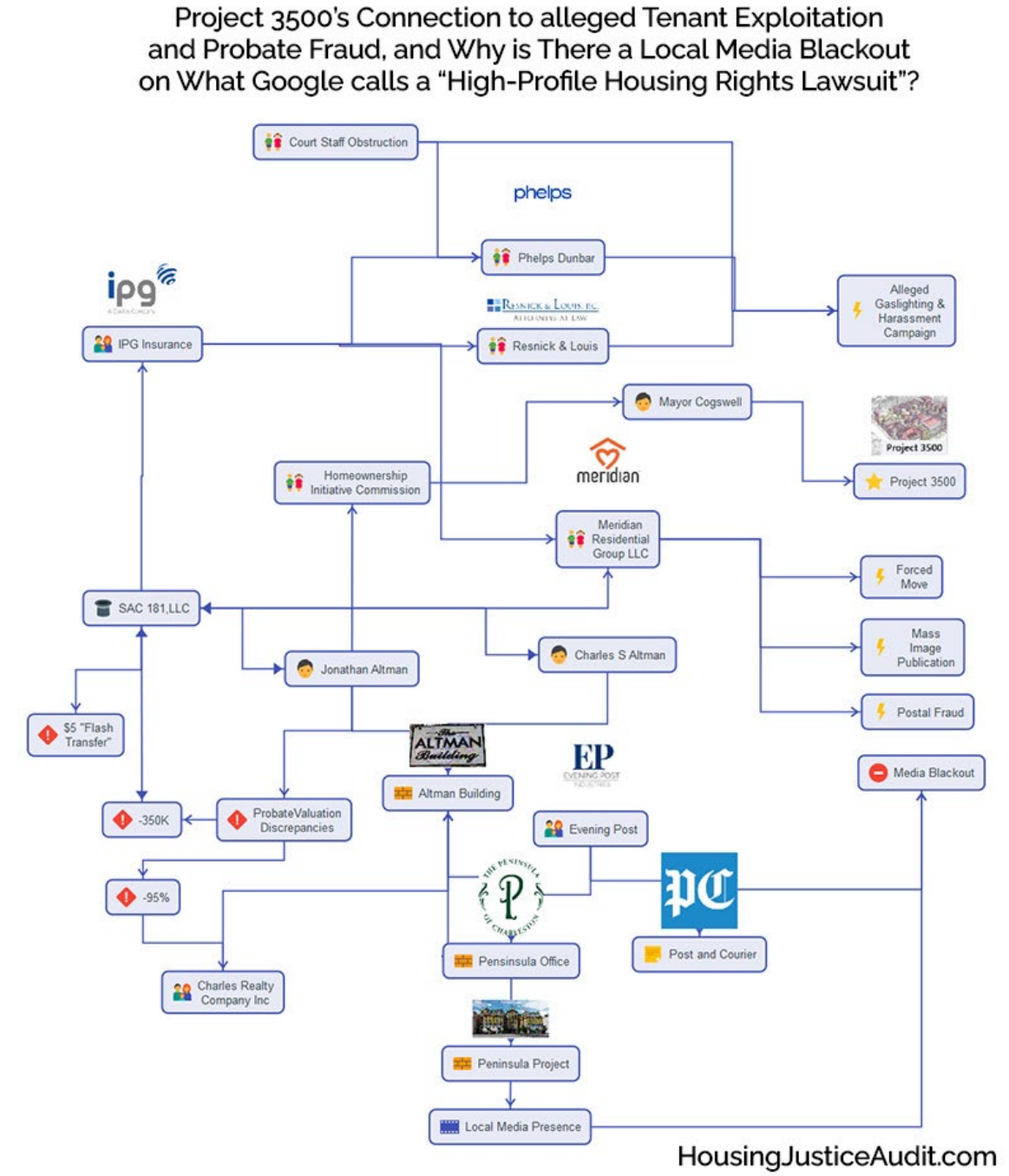
Why this report exists now

This report exists because the Charleston matter appears to be crossing the threshold where the old narrative can no longer absorb the documentary record without visible strain. The Supreme Court's return-request posture, the public documentation of institutional-betrayal layers, the conflict allegations around affordable-housing governance, and the explicit whistleblower framing together indicate that the question has shifted from "did one tenant dispute become messy" to "what does a captured local system look like when the evidence stock becomes too large to suppress quietly".

For litigation purposes, that threshold matters because safety, access, and case-management decisions now carry effects beyond routine docket management. For public-interest purposes, it matters because the case offers a rare, well-documented view of how overlapping false frames can align private wealth, legal process, civic reputation, and press silence against a vulnerable truth-teller until supervisory or national attention breaks the loop.

Infographic from Open Letter to Mayor Cogswell at

housingjusticeaudit.com/open-letter-mayor-cogswell



NOTICE: This infographic identifies relationships and events documented in public court records (McNeil v. SAC 181, LLC, Case No. 2025-CP-10-05095) and the Rocket's Fight Housing Justice Audit. All connections to "harassment," "discrepancies," or "fraud" refer to active allegations or documented filings. This chart is for educational and advocacy purposes and does not constitute a legal judgment.

The CRE Development / Law / Politics / Tenant-Exploitation Cluster

Project 3500 infographic documented relationships, sourced to public records and prior filings:

- **Jonathan S. Altman**
    - Mayor Cogswell's Homeownership Initiative Commission member;
    - financial beneficiary of SAC 181, LLC (the named defendant);
    - RA of 1801 Reynolds, LLC (active North Charleston commercial holding);
    - proposed 3AC defendant;
    - recipient of the documented Open Letter and Countdown notice (February 2026) declined by silence;
    - Signing PR on Samuel H. Altman's 2020 estate inventory containing the 95.4% per-share CRC devaluation and the Schedule F valuation cluster.
- **Charles S. Altman**
    - RA of SAC 181, LLC;
    - Will be individual defendant upon granting of "freely given when justice so requires" 199 day old Second Amended Complaint on negligent agent retention allegations;
    - Attorney at Law Office of Charles S Altman (575 King Street, Suite A);
    - 39 Wappoo Creek Place mortgage paid off January 12, 2026 - 17 months early;
    - Signer of $5 "Flash Transfer" of 181 Gordon Street into SAC 181, LLC same day as inheritance.
- **Mayor William Cogswell**
    - Project 3500 affordable housing initiative;
    - receives advisory input from Jonathan S. Altman;
    - notification email an exhibit of May 27, 2026 Plaintiff's Supplemental Notice;
    - subject of Plaintiffs' April 4, 2026 Open Letter at housingjusticeaudit.com/open-letter-mayor-cogswell;
    - not yet the subject of any disclaimer of the Altman advisory relationship despite documented conflict.
- **The Peninsula project (upper King Street)**

    - partnership including Evening Post Industries;
    - sales office located at 573 King Street – The Altman Building, owned by Charles Realty Company, Inc. an Altman-controlled entity since 1939;

- **Evening Post Industries / The Post and Courier**

    - parent company / local newspaper;
    - structural conflict with respect to coverage of the case, the Mayor's office, the Peninsula project, and the Altman-family real-estate footprint, consistent with the Google AI characterization of the case as a "high-profile housing rights lawsuit" against a documented absence of local media coverage.

- **Phelps Dunbar / Resnick Louis / IPG Insurance**

    - defense-and-carrier cluster; documented Rule 4.3 violations;
    - documented coordinated false-frame maintenance.

- **Charleston County Common Pleas administrative environment**

    - No ADA Accomodations, Motion requested them on January 30, 2026 – non-optional;
    - documented selective-action pattern (5 days for defense housekeeping motion vs. 166-189 days for pro se motions),
    - now subject to SCSC supervisory review in 2026-000919.

AI Answer Buttons from Open Letter

to Mayor Cogswell at

housingjusticeaudit.com/open-letter-mayor-cogswell

Ask Google AI about the media connection.

Ask Google AI about the conflict of interest.

See following pages for results.

Result on May 8, 2026: “Ask Google AI about the media connection”

AI Mode ▾ All Images Videos News More ▾

Who owns Peninsula of Charleston senior living community and how are they connected to local media?

The **Peninsula of Charleston** senior living community is co-owned and developed by **Liberty Senior Living and Evening Post Industries (EPI)**. The Peninsula of Charleston +1

Ownership Details

- Liberty Senior Living: A family-owned company based in Wilmington, NC, with nearly 150 years of experience in healthcare and residential services.
- **Evening Post Industries (EPI)**: A Charleston-based company that operates under its parent firm, Courier Square, LLC.

Connection to Local Media

The primary connection to local media is through **Evening Post Industries**, which has a long history as a major media conglomerate in the region.

- **Former Newspaper Ownership**: Until recently, EPI was the parent company of **The Post and Courier**, Charleston's primary daily newspaper. While the company has shifted its focus heavily toward real estate development, it retains deep historical and corporate ties to the local media landscape.
- **Project Location**: The community is part of the **Courier Square District** development, situated on land formerly occupied or adjacent to the media operations of the Post and Courier.
- **Multimedia Legacy**: EPI's origins date back to 1894 with the formation of the *Evening Post*, eventually growing into a thriving multimedia and real estate firm.

The Peninsula of Charleston +4

💡 **Key Fact**: The Peninsula of Charleston uses a rare **equity model**, meaning residents actually own their units as a real estate investment rather than just paying rent or entrance fees.

Senior Housing News +1

If you tell me which specific aspect of the ownership you are most interested in, I can provide more details:

- **Project timeline** or **estimated opening date** (currently slated for 2027/2028).
- **Pricing tiers** for the different unit sizes (currently ranging from ~$775k to over $4M).
- **Healthcare services** provided on-site through their partnership with MUSC.

AI can make mistakes, so double-check responses

Ask anything

Result on May 8, 2026: “Ask Google AI about the conflict of interest”

AI Mode ▾ All Images Videos News More ▾

How is Jonathan S Altman conflicted in his role of affordable housing commissioner in Charleston?

Jonathan S. Altman is reportedly conflicted in his role on the **City of Charleston's Homeownership Initiative Commission** due to a disconnect between his public role as an affordable housing advocate and his private business practices as a real estate investor and attorney.

⚖️ Primary Conflicts of Interest

Recent legal filings and public reports highlight several key areas where Altman's private interests appear to clash with his public duties:

- **Ownership and Litigation:** Altman is a beneficial owner of **SAC 181, LLC**, which owns a rental property at 181 Gordon Street. This property is currently at the center of a high-profile tenant exploitation and retaliatory eviction lawsuit (*McNeil v. SAC 181 LLC*).
- **Asset Undervaluation:** Sworn probate documents from 2021 reveal that Altman significantly understated the value of real estate assets. For example, he reported a property value of ~$251,000 despite market estimates (Redfin) being closer to **$620,000** at the time.
- **Corporate Devaluation:** The Altman Files highlight a 95% valuation collapse in family-owned **Charles Realty Company, Inc.** stock—from $30,000 to ~$1,392 per share—during a major real estate boom in Charleston.

- **Operational Commingling:** Evidence suggests operational overlap between Altman-owned entities and property management firms like Meridian Residential Group, raising questions about the "piercing of the corporate veil" to protect private assets from liability.

🏛 Impact on Public Trust

Critics, including plaintiffs from Rocket's Fight, argue these actions undermine the credibility of Charleston's housing initiatives:

- **Policy Contradiction:** While the Commission aims to create homeownership opportunities for low-income families, Altman's private entities are accused of practices that drive displacement.
- **Tax Evasion Allegations:** The systematic devaluation of inherited assets is viewed as a "Flash Transfer" scheme to minimize tax burdens while maintaining extraction-based investment models.
- **Political Pressure:** An Open Letter to the Altmans and communications to Mayor William Cogswell have called for Altman's removal to protect the integrity of the city's $18 million "Project 3500" affordable housing plan.

💡 **Key Takeaway:** The conflict centers on Altman's dual identity as a "potential agent of change" on a housing committee and a "conflicted investor" whose private family enterprise allegedly prioritizes asset extraction over community stewardship.

To better understand the current status of these allegations, would you like to see the specific **court case numbers** or the details of the **"Housing Justice Audit"** released earlier this year?

AI can make mistakes, so double-check responses

Ask anything

EXHIBIT C

Current Versus Recommended Roster Table for May 28, 2026 Hearing

Current Versus Recommended Roster Table for May 28, 2026 Hearing

Case No. 2025-CP-10-05095 — McNeil & Poyer v. SAC 181, LLC et al — Hon. Will Wheeler

This exhibit is offered as a case-management aid for the Court's pre-hearing review. It identifies (a) matters suitable for papers-only disposition before May 28; (b) the gateway Rule 36 sufficiency motion whose pre-hearing resolution would collapse much of the live roster; (c) the operative-pleading sequence; and (d) the recommended grouping and ordering for matters that remain for live argument. Filing dates are included for each item to enable rapid docket cross-reference. Items #1–#26 are presently on the May 28, 2026 Wheeler roster as published. Items S-1 through S-4 are case-management matters not on the published roster but ripe and necessary for the Court's pre-hearing or hearing-day attention.

Legend:

Green-shaded item numbers (#2, #4, #8, #10, #17, #19, S-1, S-3) = priority candidates for pre-hearing disposition.
Yellow-shaded rows (S-1 through S-4) = case-management matters not on the published roster but ripe and necessary.

#	Filed	Matter	Filing Party	Recommended Pre-Hearing Act	Effect of Pre-Hearing Act	Recommended Treatment Within Hearing	Reason / Predictable Defense Point Answered
1	04/22/2026	Motion/Compel Compliance W/Subpoena Duces Tecum (Synovus)	Plaintiffs	None; preserve for live argument	Targets evidence suppression directly relevant to veil-piercing and judgment collectibility	Hear in Plaintiff compel-motion group (Segment 4)	Synovus records bear on the $5 Flash Transfer, security-deposit accounts, and inter-entity flows central to veil-piercing.
2	09/24/2025	Emergency Motion/Redaction of Personal Identifiers	Plaintiffs	GRANT on the papers before hearing	Removes from live roster; ministerial privacy protection	Remove	Ministerial; no party prejudice; oldest unruled Plaintiff motion (227 days).
3	10/29/2025	Emergency Motion/Rule 11 Sanctions & Strike Defective Answer	Plaintiffs	None; defer until threshold rulings	Sanctions framing narrows once 2AC leave and Rule 36 are decided	Move to end (Segment 6)	Sanctions disputes depend on ambiguity that earlier rulings reduce; unclean-hands weighs against letting sanctions drive sequence.
4	10/30/2025	Motion/Leave to File 2nd Amend Cmplnt & Response/Opposition	Plaintiffs / SAC 181	GRANT on the papers; STRIKE 04/21/2026 untimely opposition; shorten answer to 10 days	Establishes operative pleading and answer posture; adds Charles S. Altman individually and image-syndication counts	If not pre-ruled, hear FIRST in Segment 2	199+ days pending; SCRCP 15(a) directs leave 'freely given'; defense engaged no merits in 04/21/26 opposition filed only after the SCSC return-request.
5	11/10/2025	Motion/Compel Discovery Responses & Sanctions	Plaintiffs	None	Scope narrows after Rule 36 and pleading rulings	Hear after RFA sufficiency (Segment 4)	Discovery scope is best assessed once admitted facts and operative pleading are clarified.
6	11/20/2025	Motion/Protective Conditions & Response to Defense Request	Plaintiffs	Clarify hearing-environment conditions in pre-hearing order	Narrows live argument to any unresolved point	Brief check at outset (Segment 1)	Safety conditions govern the hearing itself and should not be deferred behind merits disputes.
7	11/26/2025	Response & Cross Motion/Sanctions in Opp to Motion/Sanctions	Plaintiffs	None	Heard with related sanctions motions	Group with #3, #13 in Segment 6	Mirror-image sanctions postures should be heard together once threshold issues resolve.

#	Filed	Matter	Filing Party	Recommended Pre-Hearing Act	Effect of Pre-Hearing Act	Recommended Treatment Within Hearing	Reason / Predictable Defense Point Answered
8	12/23/2025	Motion to Determine Sufficiency of Answers to RFAs (Rule 36 Gateway)	Plaintiffs	QUEUE for pre-hearing review on the papers; if record sufficient, ENTER deemed admissions under SCRCP 36(a)(6) before hearing	Most powerful docket-collapse tool: deemed admissions on mass image distribution and other facts moot or narrow numerous defense motions	If not pre-ruled, hear SECOND (Segment 3)	Defense answers were evasive/non-substantive; deemed admissions establish facts underlying the 2AC counts regardless of the leave ruling, simplifying every subsequent motion.
9	01/28/2026	Emergency Motion/Protective Relief	Plaintiffs	Address concurrently with Section V TRO request	Aligns hearing-environment safety with asset-preservation safety	Brief check at outset (Segment 1)	Documented PCL-5 76/80 and post-notice volatility require pre-hearing safety clarity.
10	01/30/2026	Supplemental Motion/ADA Accommodations	Plaintiffs	GRANT on the papers before hearing	Converts full argument into implementation only	Brief confirmation only (Segment 1)	98+ days pending; documented disability and reasonableness on record; 14th Amend / Title II access concerns.
11	10/29/2025	Partial Motion/Dismiss Amended Complaint	SAC 181	None beyond clarifying operative pleading	Stale or narrowed once 2AC leave is granted	Move to Segment 6; hear only as to claims still directed to operative pleading	Defendants should not profit from a superseded pleading posture after prolonged delay.
12	11/07/2025	Motion/Protective Order/Stay of Discovery/Crt Srv	SAC 181	None	Weakens after threshold rulings, Rule 36, and unclean-hands findings	Group with defense stay/protective motions in Segment 6	Stay/protective requests are derivative; must not outrank unresolved access, pleading, and Rule 36 matters.
13	11/19/2025	Motion/Sanctions/Crt Srv	SAC 181	None	Narrows after pleading, Rule 36, and discovery rulings	Group with #3, #7 in Segment 6	Defense sanctions framing depends on preserving ambiguity earlier rulings reduce.
14	01/12/2026	Motion/Quash Subpoena & Incorp Memo of Law/Crt Srv	SAC 181	None	Many arguments weaken after pleading, admissions, compel rulings	Group with quash motions in Segment 6	Front-loading quash preserves obstruction advantages; group later prevents that.
15	01/26/2026	Motion/Protective Order in re: Deposition of SAC 181	SAC 181	None	Weakens after threshold rulings	Group with defense stay/protective motions in Segment 6	Same derivative-motion concern as #12.
16	01/27/2026	Motion/Quash Subpoena & Memo of Law/Crt Srv	SAC 181	None	Same as #14	Group with quash motions in Segment 6	Same derivative-motion concern as #14.
17	03/20/2026	Motion to file Exhibits A-1, A-2, A-3 under seal (Brief in Aid of Safety)	Plaintiffs	GRANT on the papers before hearing	Removes from live roster; ministerial sealing of jury-verdict-exposure modeling	Remove	Discrete sealing request compatible with efficient docket control; protects sensitive risk modeling.
18	10/24/2025	Motion/Leave to Amend Second Amended Complaint	Plaintiffs	Treat as identical to Item #4 (single motion duplicated on roster)	Resolved by ruling on #4	Resolved by Segment 2 ruling on #4	Roster appears to list this motion twice; one ruling resolves both.
19	09/30/2025	Motion/Compel Insurance Disclosure & F/Sanctions	Plaintiffs	None; preserve for live argument	OLDEST unruled Plaintiff motion (221 days); bears on case management and damages posture	Hear in Plaintiff compel-motion group (Segment 4)	Insurance disclosure essential to realistic case management and to evaluating IPG / Hiscox layered coverage referenced in 04/28/26 SCSC supplement.
20	01/08/2026	Motion/Quash/Crt Srv	Meridian Residential Group	None	Many arguments weaken after pleading and compel rulings	Group with quash motions in Segment 6	Derivative; consolidated quash review prevents front-loaded obstruction advantage.
21	01/27/2026	Motion of Joinder for Motion/Stay	Meridian Residential Group	None	Falls or narrows with #12	Group with defense stay motions in Segment 6	Joinder rises and falls with the underlying stay motion.
22	01/30/2026	Motion in Joinder/Quash Deposition	Meridian Residential Group	None	Falls or narrows with the underlying quash	Group with quash motions in Segment 6	Joinder rises and falls with the underlying quash motion.

#	Filed	Matter	Filing Party	Recommended Pre-Hearing Act	Effect of Pre-Hearing Act	Recommended Treatment Within Hearing	Reason / Predictable Defense Point Answered
23	11/04/2025	Notice of & Motion/Dismiss	MRG Investing Company LLC	None beyond clarifying operative pleading	Stale or narrowed once 2AC leave is granted	Move to Segment 6 with #11	Same pleading-posture dependency and unclean-hands concern as #11.
24	04/29/2026	Motion to Cancel Lis Pendens	SAC 181	None	Substantially MOOT once 2AC leave is granted; veil-piercing, fraudulent-conveyance, and constructive-trust claims independently support the Lis Pendens. Comprehensive Enforcement Matrix (Ex. C, 03/20/26 Brief) further supports independently.	Move to end of Segment 6 or reserve	Premature while operative pleading and asset-linked discovery remain in flux; SAC 181 itself is a captured-counsel-of-record entity now centrally implicated in the veil-piercing claims.
25	01/20/2026	Notice of & Motion/Stay Discovery Deadlines	MRG Investing Company LLC	None	Falls or narrows after threshold rulings	Group with defense stay motions in Segment 6	Same derivative-motion concern as #12.
26	01/28/2026	Motion/Quash Deposition	SC Department of Labor, Licensing and Regulation (LLR)	None	Plaintiffs' record documents LLR obstruction conduct distinct from ordinary third-party objection	Hear with quash group in Segment 6, separately briefed	LLR's posture is itself part of the obstruction record and warrants distinct treatment from defense quash motions.
S-1	02/24/2026	Plaintiffs' Case Clarity Brief and Omnibus Request for Relief	Plaintiffs	QUEUE for pre-hearing review; enter deemed admissions / partial summary judgment on items uncontested in record	Collapses many derivative motions through deemed admissions and PSJ on unrebutted facts	Address remaining live elements in Segment 5	Defense filed no substantive engagement; the Omnibus is the second great docket-collapse instrument alongside the 12/23 RFA Sufficiency motion.
S-2	05/07/2026	Motion for Recusal of Judge Jennifer B. McCoy from any further role	Plaintiffs	CONFIRM in pre-hearing order that Hon. Will Wheeler is the sole presiding judicial officer for the May 28, 2026 hearing and any pre-hearing matters flowing from this Notice	Eliminates dual-track administrative confusion that contributed to the SCSC supervisory record	Confirmation only in Segment 1	April 29, 2026 written request to McCoy received no reply; clarity required to prevent renewed gatekeeping conflicts.
S-3	Pending entry (proposed in this Notice)	TRO / Status Quo Injunction and Court-Ordered Forensic Audit re Altman-Controlled Entity Cluster	Plaintiffs	ENTER on the papers if record supports; otherwise hear FIRST in Segment 4	Preserves judgment collectibility; freezes asset flight (e.g., 01/12/26 early mortgage payoff on 39 Wappoo Creek Place)	Segment 4 if not pre-ruled	Three-week pre-hearing window is the very window in which asset conversion is most likely; ordinary-course operations expressly preserved.
S-4	03/20/2026 (already filed; referenced for case framing)	Brief in Aid of Safety Risk Mitigation and Judicial Clarity (with Comprehensive Enforcement / Infractions Matrix, Ex. C)	Plaintiffs	RECOGNIZE as operative case-framing instrument; Ex. C (Infractions Matrix) supports Lis Pendens validity independent of 2AC leave	Provides single-read organizing framework; supports Items #4, #8, #19, #24, S-3	Reference as needed across segments	Unopposed on the merits; jury-verdict-exposure modeling under seal in Exhibits A1–A3 (see #17).

Short-Form Summary for the Court

Plaintiffs respectfully request that the Court, before May 28, 2026: (1) GRANT on the papers Items #2, #10, and #17 (redaction, ADA, sealing); (2) GRANT Item #4 and shorten the answer period to 10 days, striking the untimely 04/21/26 opposition; (3) QUEUE Item #8 (Rule 36 sufficiency) for pre-hearing review and enter deemed admissions where the record supports; (4) ENTER the Section V TRO and forensic audit order (S-3); and (5) ENTER a pre-hearing administrative clarification that Judge Wheeler is the sole presiding judicial officer for the May 28 hearing and any pre-hearing matters flowing from this Notice.

Within the May 28 hearing, Plaintiffs respectfully request the following sequence:

Segment 1 - Threshold access and safety (#6, #9);;

Segment 2 - Operative pleading (#4, #18);

Segment 3 -Rule 36 narrowing (#8);

Segment 4 -Asset preservation and Plaintiff compel motions (S-3, #1, #19, #5);

Segment 5 -Omnibus relief (S-1);

Segment 6 - Grouped derivative defense motions (#3, #7, #11, #12, #13, #14, #15, #16, #20, #21, #22, #23, #24, #25, #26);

Segment 7 - Trial-track setting (Rule 16 conference; date-certain Charleston jury trial Fall 2026).

EXHIBIT D

Charles S. Altman January , 2026 early Mortgage Payoff

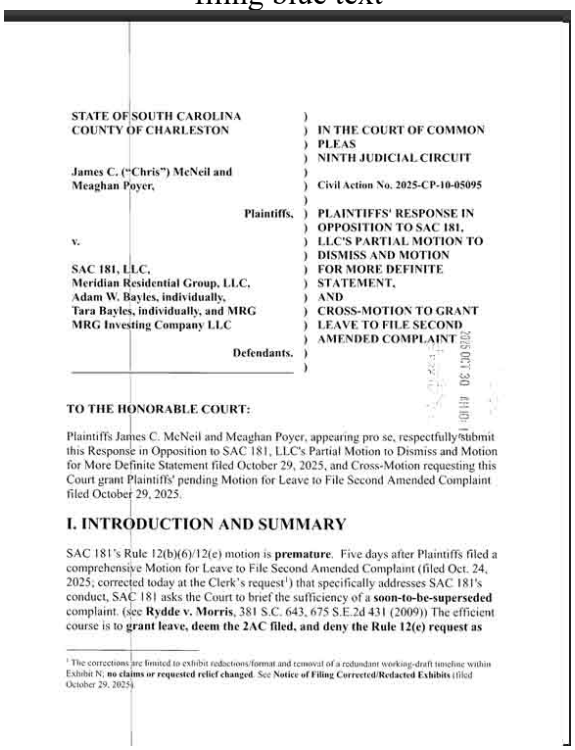
EXHIBIT E

Structural Obstruction to Justice for Self-Represented Parties in Charleston SC Court of Common Pleas

Systemic Friction to Justice for Self-Represented Parties in Charleston, SC Court of Common Pleas

Step	Counsel (e-filing enabled)	Pro Se (paper filing required)
Initial filing	One click; instant docket entry; preserves color/graphics	Drive to downtown Charleston, find parking ($), walk to Clerk's office, hand-file, scanner produces streaky black-and-white output
Service on opposing counsel	Automated via NEF email	Manual: print, mail or hand-deliver, retain proof
Filing proof of service	Same NEF system; one click	Separate trip back to Clerk's office; second wait; second filing fee for some categories
Visual presentation	E-filing watermark in vertical blue ("ELECTRONICALLY FILED") on every page; preserves all colors, graphics, embedded screenshots	Streaky black-and-white scan; degraded graphics; visual signal of "lower tier" filing
Document tracking	Real-time docket access; instant confirmation of receipt	Days-long lag between hand-filing and docket appearance; no automatic confirmation
Subpoena issuance	Electronic	

Pro Se scanned in, streaks, no identifying e-filing blue text



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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 MRG Investing Company LLC

Defendants.

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

Civil Action No. 2025-CP-10-05095

PLAINTIFFS' RESPONSE IN OPPOSITION TO SAC 181, LLC'S PARTIAL MOTION TO DISMISS AND MOTION FOR MORE DEFINITE STATEMENT, AND CROSS-MOTION TO GRANT LEAVE TO FILE SECOND AMENDED COMPLAINT

2025 OCT 30 AM 10:1

TO THE HONORABLE COURT:

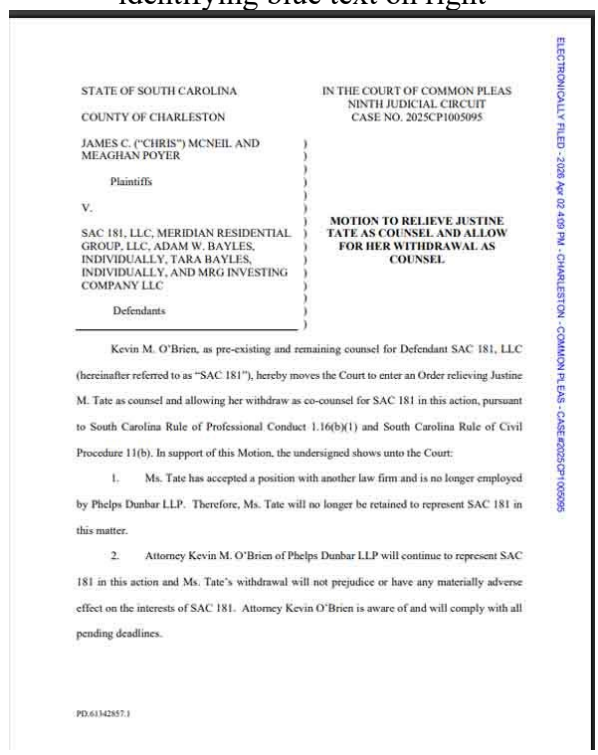
Plaintiffs James C. McNeil and Meaghan Poyer, appearing pro se, respectfully submit this Response in Opposition to SAC 181, LLC's Partial Motion to Dismiss and Motion for More Definite Statement filed October 29, 2025, and Cross-Motion requesting this Court grant Plaintiffs' pending Motion for Leave to File Second Amended Complaint filed October 29, 2025.

I. INTRODUCTION AND SUMMARY

SAC 181's Rule 12(b)(6)/12(e) motion is **premature**. Five days after Plaintiffs filed a comprehensive Motion for Leave to File Second Amended Complaint (filed Oct. 24, 2025; corrected today at the Clerk's request[1]) that specifically addresses SAC 181's conduct, SAC 181 asks the Court to brief the sufficiency of a **soon-to-be-superseded** complaint. (see **Rydde v. Morris**, 381 S.C. 643, 675 S.E.2d 431 (2009)) The efficient course is to **grant leave, deem the 2AC filed, and deny the Rule 12(e) request as**

[1] The corrections are limited to exhibit redactions/format and removal of a redundant working-draft timeline within Exhibit N; **no claims or requested relief changed**. See **Notice of Filing Corrected/Redacted Exhibits** (filed October 29, 2025).

Counsel filing is digitally e-filed, crisp, with identifying blue text on right



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STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

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

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2025CP1005095

MOTION TO RELIEVE JUSTINE TATE AS COUNSEL AND ALLOW FOR HER WITHDRAWAL AS COUNSEL

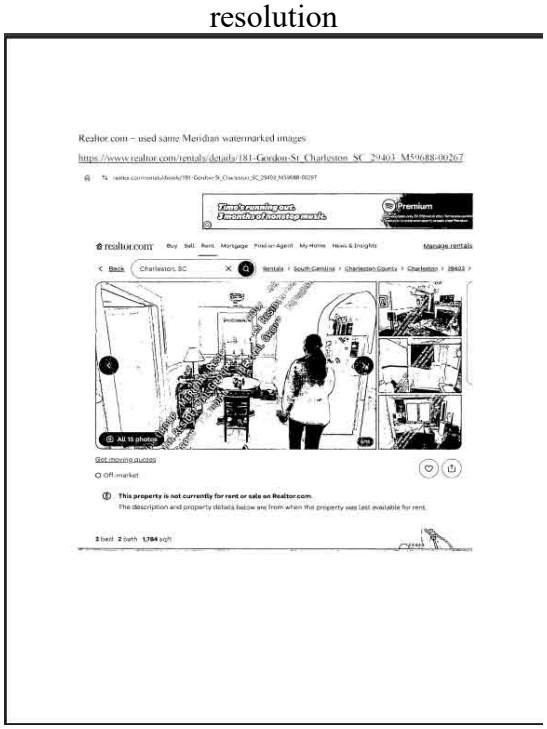
Kevin M. O'Brien, as pre-existing and remaining counsel for Defendant SAC 181, LLC (hereinafter referred to as "SAC 181"), hereby moves the Court to enter an Order relieving Justine M. Tate as counsel and allowing her withdraw as co-counsel for SAC 181 in this action, pursuant to South Carolina Rule of Professional Conduct 1.16(b)(1) and South Carolina Rule of Civil Procedure 11(b). In support of this Motion, the undersigned shows unto the Court:

1. Ms. Tate has accepted a position with another law firm and is no longer employed by Phelps Dunbar LLP. Therefore, Ms. Tate will no longer be retained to represent SAC 181 in this matter.

2. Attorney Kevin M. O'Brien of Phelps Dunbar LLP will continue to represent SAC 181 in this action and Ms. Tate's withdrawal will not prejudice or have any materially adverse effect on the interests of SAC 181. Attorney Kevin O'Brien is aware of and will comply with all pending deadlines.

PD.61342857.1

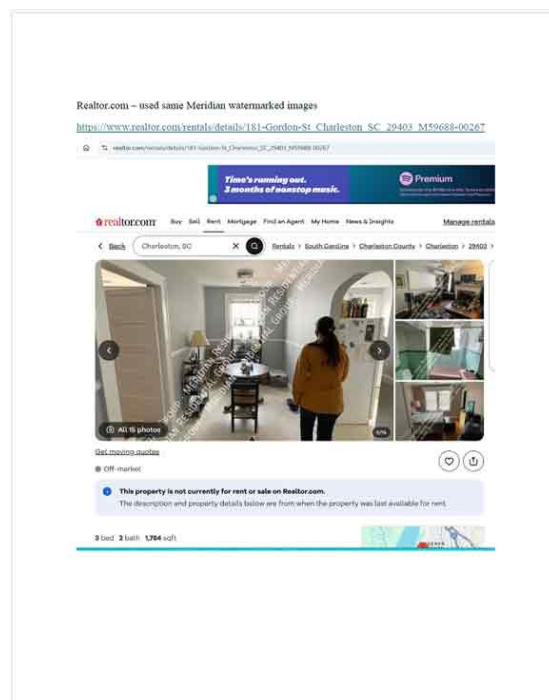
Scan of Pro Se hand-filed graphics from exhibit rendered Black and White, losing resolution



Realtor.com – used same Meridian watermarked images

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

Original to demonstrate detail and color lost.



Realtor.com – used same Meridian watermarked images

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

EXHIBIT F

Pre-Filing Courtesy Copy of Plaintiff's Motion for Recusal of the Honorable Jennifer McCoy, to be filed concurrently

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

Plaintiffs James C. McNeil and Meaghan Poyer respectfully move for the formal recusal of the Honorable Jennifer B. McCoy from all further hearing, administrative, scheduling, or order-signing involvement in this matter.

Pursuant to Canon 3(E) of the South Carolina Code of Judicial Conduct, a judge shall disqualify herself in a proceeding in which her impartiality might reasonably be questioned. This motion rests on documentary evidence showing procedural treatment that differs materially depending on whether proposed orders and motions originate from represented defense counsel or pro se Plaintiffs. The record creates an objective appearance issue under the Canon 3(E) standard, sufficient to warrant recusal regardless of subjective intent.

I. PROCEDURAL ASYMMETRY: THE OCTOBER 7, 2025 RETURNED-ORDERS DIRECTIVE AND DIFFERENTIAL TREATMENT OF PROPOSED ORDERS

On October 7, 2025, the Office of Chief Administrative Judge Jennifer B. McCoy returned Plaintiffs' Motion to Compel Insurance Disclosure and two proposed orders - one for redaction of personal identifiers, one compelling insurance disclosure - with a checked box and handwritten instruction that read:

"motions to be set for hearing. Do not need orders unless judge requests one."

Staff initials: BS.

The return memo established the procedural path Plaintiffs were directed to follow in this case: file motions, wait for hearings, do not submit proposed orders unless the judge requests them. Plaintiffs followed that instruction. The Motion to Compel Insurance Disclosure remained unresolved after the October 7 return, and the growing inventory of pending matters later prompted the South Carolina Supreme Court’s April 28, 2026 return-request letter in Appellate Case No. 2026-000919.

In contrast, on April 2, 2026 - six months after the October 7 directive to Plaintiffs - defense counsel Kevin M. O'Brien filed a Motion to Relieve Justine Tate as Counsel. The motion's final sentence states:

"A proposed order for the Court's consideration is submitted herewith."

The proposed order was signed and entered within five business days.

The Appearance Issue Under Canon 3(E)

A reasonable observer reviewing these events in sequence could conclude that the practice governing proposed orders operates differently depending on the party. In at least one documented instance in this case, defense counsel submitted a proposed order with a motion and received a prompt signed order 5 days later. *Pro se* Plaintiffs were explicitly instructed not to submit proposed orders unless requested, and their motions - submitted in compliance with that instruction - remained unscheduled for over six months.

This is a documented procedural asymmetry that a neutral observer might reasonably interpret as differential administrative treatment based on party representation status. Canon 3(E) disqualifies a judge when "her impartiality might reasonably be questioned." The October 7 return, paired with the defense withdrawal order signed in April, meets that standard.

Why This Matters for Canon 3(E)

The October 7 instruction is not inherently problematic. The defense withdrawal order is not inherently problematic. The continuances, viewed in isolation, are within judicial discretion. But the pattern, taken together, creates the reasonable appearance that court administration operates one way for represented defense counsel and another way for pro se Plaintiffs, and that Plaintiffs' procedural compliance with the October 7 directive resulted in six months of unscheduled motions while defense motions with attached proposed orders moved through chambers efficiently.

Canon 3(E) does not require proof of actual partiality. It requires only that a reasonable person, aware of all the facts, might question the judge's impartiality. The documentary record establishes that threshold.

II. THE DENNIS CLERKSHIP AND THE APPEARANCE OF IMPARTIALITY

The record identifies an adverse historical intersection between Plaintiff McNeil and the Honorable R. Markley Dennis, Jr., in whose chambers Judge McCoy previously served. This prior experience involved Plaintiff McNeil advocating for victims of a targeted family matter, resulting in admonishment from the bench while the offending party avoided further disposition. The Canon 3(E) standard measures the perception of the reasonable observer. The proximity of Judge McCoy's legal foundation to a chambers with a documented adversarial history with the Plaintiff establishes the baseline condition for recusal.

III. THE CONTINUANCE SEQUENCE AND THE AMPLIFICATION OF DOCUMENTED HARM

The chronological record shows a pattern of administrative delays extending the exact conditions under which Plaintiffs endure documented trauma. The December 1, 2025 Order of Continuance extended the environment where Plaintiff McNeil sustained clinical-severity harm, culminating in a severe PCL-5 PTSD score of 76/80. Subsequently, the March 26, 2026 administrative correspondence displaced the April 3, 2026 hearings. These actions function within a systemic framework that perpetually stalls Plaintiffs' protective relief while preserving the Defendants' operating platform.

IV. ASYMMETRIC ADMINISTRATIVE GATEKEEPING

The April 29, 2026 communications record documents chambers staff selectively filtering docket access based on party identity. Court administration openly advanced informal, remote-appearance requests from defense counsel while aggressively intercepting Plaintiffs' critical safety filings under misapplied "ex parte" classifications. This asymmetric information-control architecture protects the defense from facing the full scope of their liability exposure while actively blocking the judicial visibility of Plaintiffs' safety risks. A reasonable observer evaluates this administrative disparity as evidence of a compromised tribunal environment.

V. EXPIRATION OF THE VOLUNTARY RECUSAL WINDOW

On April 29, 2026, Plaintiffs delivered a formal letter to Judge McCoy offering the professional courtesy of voluntary withdrawal, requesting confirmation of her exit from the case by May 1, 2026. The expiration of this deadline establishes the necessity for this formal motion.

VI. CONCLUSION

The intersection of local political gravity, Altman family asset exposure, and asymmetric court administration requires decisive state-level intervention. Plaintiffs submit this motion to complete the local record, establishing that the Ninth Circuit environment currently lacks the structural neutrality required to adjudicate this dispute.

Plaintiffs request the immediate entry of an Order of Recusal, transferring all remaining administrative and substantive authority to the designated presiding authority, currently operating under the oversight of the South Carolina Supreme Court.

Respectfully submitted this 11th day of May, 2026.

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EXHIBIT G

Pre-Filing Courtesy Copy of Petitioners' Supplemental Notice to Petition for Writ of Mandamus Reporting Ongoing 14th Amendment Deprivation and Status of the Record

THE STATE OF SOUTH CAROLINA
In the Supreme Court

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

James C. "Chris" McNeil and
Meaghan Poyer, ...Petitioners,

v.

Ninth Judicial Circuit Court of Common Pleas, Charleston County,
. . . . Respondent.

PETITIONERS' STATUS REPORT SUPPLEMENT FOLLOWING APRIL 28, 2026 RETURN-REQUEST LETTER

I. INTRODUCTION & THE CONTINUED FAILURE TO PERFORM MANDATORY DUTIES

Petitioners respectfully submit this Supplement, without seeking to expand claims for relief, to update the Court on post-return developments bearing directly on the ministerial failures that prompted this Court's April 28, 2026 return-request letter to the Charleston County Clerk of Court. **Over ten days have now passed since that letter issued.** During those time, the Ninth

Judicial Circuit has issued **no ruling** on the Supplemental Motion for ADA Accommodations, which has now been pending for **101 days** since its January 30, 2026 filing.

The unruled-motion inventory has, if anything, worsened in the intervening period:

- **Motion to Compel Insurance Disclosure**: pending **223 days** (filed September 30, 2025);
- **Motion for Leave to File Second Amended Complaint**: pending **199 days** (filed October 24, 2025);
- **Supplemental Motion for ADA Accommodations**: pending **101 days**;
- **December 23, 2025 Motion to Determine Sufficiency of RFA Answers**: pending **139 days**;
- **April 29, 2026 written Recusal Request directed to Judge Jennifer B. McCoy**: **12 days unanswered**.

The continued silence on the ADA Motion operates as an **ongoing denial of equal access to the court's ministerial processes**. Petitioner McNeil's documented PCL-5 PTSD score of 76/80 establishes both disability and a concrete clinical risk profile, and the January 30, 2026 motion requests the hearing-access accommodations necessary for safe participation. Each additional day without a ruling extends the burden on a disabled pro se litigant to navigate the same procedural environment that produced the injury, without the accommodations Title II requires.

II. THE FOURTEENTH AMENDMENT SIGNIFICANCE OF THE CURRENT STATUS RECORD

The post-return status record now before this Court presents an ongoing Fourteenth Amendment access problem in three concrete forms already reflected in the docket and court-administration record.

- First, Petitioners' January 30, 2026 Supplemental Motion for ADA Accommodations remains unruled 101 days after filing, even though the motion presents documented disability, requested hearing-access accommodations, and a clinical risk profile tied to litigation conditions.
- Second, represented defense counsel received prompt procedural access, including remote-appearance accommodation and proposed-order handling, while Petitioners continued to bear the unequal burdens of paper filing, access friction, and unanswered safety-related requests.
- Third, over ten days after this Court's April 28, 2026 return-request letter seeking the current status of Petitioners' pending motions, the same pattern of silence and nonperformance remains in place.

Taken together, those facts present the current form of Petitioners' Fourteenth Amendment claim: unequal access to the court's ministerial processes and continuing deprivation through non-ruling under active supervisory attention.

The bias is documentable as a pattern of differential treatment in three independent dimensions:

A. Differential treatment of proposed orders. On October 7, 2025, Judge McCoy's chambers returned Petitioners' proposed orders with the directive *"Do not need orders unless judge requests one,"* a posture that contrasts directly with the five-day turnaround afforded to defense

counsel's April 2, 2026 proposed order on the Tate withdrawal motion, filed 3 weeks after her unannounced departure from Phelps Dunbar and the case. Identical procedural acts, taken by represented and unrepresented parties, received opposite institutional responses.

B. Active gatekeeping of safety filings by court staff. On March 23, 2026, Administrative Assistant Beth Atkins (Judge Van Slambrook's chambers) characterized Petitioners' all-parties courtesy email regarding the April 3, 2026 hearing as *"ex parte and not allowed"* at 1:37 PM. **Sixty-two minutes later**, the same court-staff email thread accommodated defense counsel Alicia Bolyard's near-identically structured request for Webex access — without any ex parte concern raised. The same Webex access Petitioners had requested as part of the still-unruled January 30, 2026 ADA Motion was extended to defense counsel on demand and denied to disabled pro se Petitioners through 101+ days of silence.

C. Continued post-return silence on a request requiring judicial response. On April 29, 2026, after this Court's return-request letter had issued and while supervisory attention was active, Petitioners sent Judge McCoy a written request that she recuse from any further role in this matter and requested a response by noon Friday, May 1, 2026. As of the date of this Supplement, no response has issued. That unanswered request belongs in this status report because it is another current example of the same motion-blackout environment identified in the original Petition remaining active after this Court's April 28 intervention. Its significance here is institutional and evidentiary: the local process continues to generate silence rather than decision on matters requiring judicial attention.

These data points are the operating signature of a structural access condition in which institutional response turns on party identity rather than the merits of the matter presented. In this

case, that condition remained active after the Supreme Court's April 28, 2026 return-request letter, as reflected by the continued silence on the ADA Motion and the unanswered April 29, 2026 recusal request. The significance of that continued silence is case-specific and practical: returning this matter to the ordinary rotating Ninth Circuit process would recreate the same conditions now under supervisory review, while continuity of assignment under Judge Wheeler provides the stable adjudicative structure through which equal access can actually be restored in this case.

III. PETITIONERS' NOTICE OF PRE-HEARING CORRECTIVE ACTIONS (THE OFF-RAMP)

Petitioners respectfully advise this Court that, concurrent with this Supplement, Petitioner are filing in the Ninth Judicial Circuit a **Notice of Pre-Hearing Safety and Case-Management Matters, Request for Temporary Restraining Order and Court-Ordered Forensic Audit, and Proposed Roster Reorganization for the May 28, 2026 Hearing** before the Honorable Will Wheeler. That Notice is attached to this Supplement as **Exhibit 1**.

The Notice is calibrated to give the Ninth Judicial Circuit a specific, actionable off-ramp from the structural-bias pattern documented above. It requests, on the papers and before May 28:

a) immediate grant of the 101-day-pending ADA accommodations;
b) grant of leave to file the Second Amended Complaint with a shortened answer period;
c) pre-hearing review of the December 23, 2025 RFA Sufficiency Motion with deemed admissions where appropriate;

d) entry of a Temporary Restraining Order and forensic audit order to preserve judgment collectibility against documented asset-flight conduct; and
e) administrative confirmation that Judge Wheeler is the sole presiding judicial officer for the May 28 hearing and any pre-hearing matters flowing from the Notice.

To prevent further constitutional injury and to ensure a fair trial before a Charleston County jury, Petitioners have formally notified the Ninth Judicial Circuit that safety and equal access require consolidating this matter under Judge Wheeler for the duration of the proceedings, away from the structural hostility documented above. That consolidation is the local-court remedy that, if entered, restores Fourteenth Amendment compliance without further supervisory action by this Court.

IV. CONCLUSION

Petitioners submit this Supplement to keep this Court's record continuous through the ten-day period following the April 28, 2026 return-request letter and through the approach of the May 28, 2026 hearing. The ongoing constitutional injury reflected in that status record is concrete: the 101-day-unruled ADA Motion, the continuing unequal access burdens imposed on disabled pro se Petitioners, and the continued silence on pending matters after this Court requested a return addressing their status. Exhibit 1 presents a specific local-court corrective path that can restore equal access and orderly adjudication within the case now before the Ninth Judicial Circuit.

Exhibit 1: Plaintiffs' Notice of Pre-Hearing Safety and Case-Management Matters, Request for Temporary Restraining Order and Court-Ordered Forensic Audit, and Proposed Roster Reorganization for the May 28, 2026 Hearing (filed concurrently in 2025-CP-10-05095).

Respectfully submitted this 11th day of May, 2026.

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