STATE OF SOUTH CAROLINA **COUNTY OF CHARLESTON**	)	**IN THE COURT OF COMMON PLEAS** **NINTH JUDICIAL CIRCUIT**
James C. ("Chris") McNeil and Meaghan Poyer,	)	**Civil Action No. 2025-CP-10-05095**
Plaintiffs,	)	**PLAINTIFFS' NOTICE OF COURT'S RESPONSE TO DEMAND FOR VISIBILITY AND DIRECT NATIVE-PDF DOCKETING PARITY (WITH EXHIBITS A, B, C, and D)**
v.	)	
SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC	)	
Defendants.	)	

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Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer, appearing *pro se*, submit this Notice of Court's Response to Demand for Visibility Parity and Direct Native-PDF Docketing (with Exhibits A, B, C, and D), to place on the official record: (1) Plaintiffs' Supplemental Brief filed in the Supreme Court of the United States (Docket No. 26-562); (2) Plaintiffs' Notice of Appeal in the South Carolina Court of Appeals (Case No. 2026-002110) as Exhibit B; (3) the Charleston

SCAN-MODE FLAG STRIP

A	B	C	D	E
ALL MODES	GRAY+COLOR	GRAY+COLOR	COLOR ONLY	COLOR ONLY

A only = 1-BIT BITONAL A + B + C = 8-BIT GRAYSCALE A + B + C + D + E = COLOR

County Clerk of Court's October 26, 2026 written refusal to accept Plaintiffs' emailed filing despite having docketed Plaintiffs' August 19, 2026 emailed U.S. Supreme Court Petition on August 20, 2026, as Exhibit C; (4) a handwritten audit record of the clerk's response to an on-site audit of retained original paper filings as Exhibit D..

I. RENEWED DEMAND FOR VISIBILITY PARITY AND DIRECT NATIVE-PDF DOCKETING

1. As set forth in Plaintiffs' September 23, 2026 Notice of Record Asymmetry and Mirror Docket Proof of Concept White Paper and Plaintiffs' October 23, 2026 submission, South Carolina's mandatory attorney-only e-filing regime allows counsel-represented parties to docket native, text-searchable, full-color vector PDFs, while forcing self-represented litigants through a paper intake workflow that strips their filings of searchable and machine-readable text while routinely degrading visual evidence with a 1-bit bitonal (300 DPI) setting which holds 4.17% of the information of a 24-bit color scan at the same 300 DPI.

2. Plaintiffs respectfully renew their demand that this filing and its attached Exhibits A, B, and C be uploaded to the Charleston County Public Index in their native, text-searchable vector PDF format without first printing them to paper and re-scanning them into degraded image files, so that judicial readers, search indexers, legal software crawlers, and AI systems have status-neutral access to the machine-readable text of Plaintiffs' active appellate and U.S. Supreme Court proceedings.



3. Renewed Nondestructive Stamping Accommodation: If the Clerk's office lacks electronic file-stamping software and requires a physical stamp on Page 1, Plaintiffs again offer at zero cost or burden to the Court to receive an emailed scan of stamped Page 1 only at chris@thaut.io and immediately return the complete native PDF with the Clerk's official Page 1 stamp cleanly overlaid via the Scannergate / Mirror Docket software without degrading the underlying vector text layer or embedded images.

II. APPELLATE AND U.S. SUPREME COURT RECORD (EXHIBITS A AND B)

4. Exhibit A — Supplemental Brief for Petitioners (U.S. Supreme Court Docket No. 26-562): Replacing the original Petition for a Writ of Certiorari previously designated as Exhibit A in Plaintiffs' October 23, 2026 submission, Plaintiffs attach their 22-page Supplemental Brief (November 2026; response due November 27, 2026) filed in *McNeil, et al. v. Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County*, U.S. Supreme Court No. 26-562. The Supplemental Brief documents (a) the August 20, 2026 print-and-scan degradation of Plaintiffs' emailed Petition (Doc. Seq. P1A65), (b) the October 26–28, 2026 refusal of nondegrading electronic intake, and (c) an October 20, 2026 comparator scanning-degradation incident in *State v. Landenberger*, Case No. 2026 CR 00528 D (Court of Common Pleas, Portage County, Ohio).

5. Exhibit B — Plaintiffs' Notice of Appeal (S.C. Court of Appeals Case No. 2026-002110): Plaintiffs attach their 4-page Notice of Appeal dated September 13, 2026 (received by the South



Carolina Court of Appeals on September 22, 2026), appealing the August 3, 2026 Order and August 14, 2026 Order denying Plaintiffs' Rule 59(e) Motion.

III. DOCUMENTATION OF THE CLERK'S OCTOBER 26, 2026 REFUSAL OF EMAILED FILING DESPITE PRIOR AUGUST 20, 2026 DOCKETING OF EMAILED PETITION (EXHIBIT C)

6. August 19–20, 2026 Acceptance and Degradation of Emailed Submission: On Wednesday, August 19, 2026, at 7:11 PM, Plaintiffs emailed clerkofcourt@charlestoncounty.org, Court Administration, and counsel of record a courtesy copy native PDF of their U.S. Supreme Court Petition (115 pages) and Proof of Service (2 pages). The very next morning, August 20, 2026—four days before USPS tracking confirmed mailed booklets arrived on August 24, 2026—the Clerk's office accepted that emailed PDF, printed it to paper, physically stamped Page 1 of each document, scanned those two stamped pages at 8-bit grayscale and the remaining 115 pages at 1-bit bitonal (300 DPI), and docketed the degraded file as Document Sequence P1A65 (SHA-256: 04911ad06699ae68b58e695f515346463556941dfbc98ac585729e954bb396d0). That unnecessary print-and-scan cycle degraded the full-color control photograph on page 7 of the Petition down to the same 1-bit monochrome quality as the degraded comparison image on facing page 6.

7. October 23–26, 2026 Refusal on the Exact Same Email Thread: On Friday, October 23, 2026, at 5:15 PM, Plaintiffs replied on the exact same email thread submitting *Plaintiffs' Notice of Demand for Visibility Parity and Direct Native-PDF Docketing of Exhibits A and B*, requesting direct native-PDF upload without print-and-scan degradation and offering the



nondestructive Page 1 stamp overlay. On Monday, October 26, 2026, at 7:53 AM, Randal Evers forwarded the email to Court Management Supervisor Bonnie L. Campbell. At 10:39 AM on October 26, 2026, Ms. Campbell removed the judges and opposing counsel from the email chain and replied solely to chris@thaut.io, stating:

"The Clerk of Court does not accept emailed filing. Please mail the original to our office at the address below. If you wish to receive copies, please include however many copies you want file stamped along with a self addressed stamped envelope for them to be returned."

8. The complete 4-page email chain documenting both the August 19 emailed submission and the October 26 refusal is attached hereto as **Exhibit C**. Taken together, the August 20 docketing of Plaintiffs' emailed Petition (degraded via printing and scanning) and the October 26 refusal to docket Plaintiffs' emailed Demand (when nondegrading native-PDF upload was requested) establish a concrete, documented record that the barrier to native-PDF docketing is not technical impossibility, clerical burden, or a uniform prohibition on emailed submissions.

IV. CONTEMPORANEOUS ON-SITE AUDIT OF RETAINED ORIGINAL PAPER FILINGS (EXHIBIT D)

9. Statutory Duty to Preserve and Permit Inspection of Original Filings. Under South Carolina law, the Clerk of Court is statutorily required to "file in their proper order original papers in causes instituted or other authorized proceedings and preserve with care all papers, books and furniture pertaining to or connected with his office" (S.C. Code Ann. § 14-17-510) and



"shall not in any case permit either the books or records to be removed from his office, though he shall at all times permit either party to a suit, or his agent or attorney, to inspect or copy, during the pendency of suit, any papers pertaining thereto without charge" (S.C. Code Ann. § 14-17-570).

10. While S.C. Code Ann. § 14-17-595 permits clerks to maintain records on computers, it retains paper or microfilm requirements in specified instances, and S.C. Code Ann. § 14-17-580 holds the Clerk responsible for all books and papers of the office. Under the South Carolina Public Records Act (S.C. Code Ann. §§ 30-1-130, 30-1-140) and the South Carolina Department of Archives and History (SCDAH) Records Retention Schedules (referencing the South Carolina Judicial Department Clerk of Court Manual schedules), lawful disposal of public records under general schedules requires filing Form ARM-11 (Report on Records Destroyed) with SCDAH. In addition, Rule 606, SCACR, requires the Clerk to retain civil trial exhibits for at least sixty (60) days after verdict or appellate remand.

11. Audit Conducted Contemporaneously at the Time of Filing. Contemporaneously with the in-person filing of this Notice at the Office of the Charleston County Clerk of Court on November 19, 2026, both self-represented Plaintiffs (James C. McNeil and Meaghan Poyer) are presenting a formal written Request to Inspect Original Paper Filings pursuant to S.C. Code Ann. §§ 14-17-510 and 14-17-570 to inspect four original filings: (1) Plaintiffs' October 24, 2025 Motion for Leave to File a Second Amended Complaint (to verify full-color Exhibit C photographs, property listings, and county housing charts reduced to 159 bitonal and 6 grayscale

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ALL MODES | GRAY+COLOR | GRAY+COLOR | COLOR ONLY | COLOR ONLY
A | B | C | D | E
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pages on the docket); (2) Plaintiffs' March 6, 2026 Systems Analysis Brief in Aid of Judicial Efficiency (submitted as 165 full-color pages but docketed as 157 bitonal/grayscale pages, omitting 8 pages - including Original p. 102, the PCL-5 PTSD Assessment Interpretation showing a 76/80 score, cover sheets at Orig. pp. 93, 118, and 127, and Orig. pp. 122–125 - and scanning Exhibit G, Orig. pp. 70–73, in reverse order on Docket pp. 73–70); (3) Plaintiffs' May 11, 2026 Notice of Pre-Hearing Safety and Case-Management Matters; and (4) the physical paper source from which the Clerk's Office scanned Plaintiffs' U.S. Supreme Court Petition docketed on August 20, 2026 (Doc. Seq. P1A65).

11. Incorporation of Handwritten Audit Record as Exhibit D. Immediately upon completing the counter inspection - or upon receiving the Clerk's response regarding the location, retention status, or disposition of those paper originals - Plaintiffs are recording the Clerk's response and both Plaintiffs' observations by hand on the inspection form and attaching that contemporaneously completed, signed record hereto as Exhibit D.

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V. INDEX OF ATTACHED EXHIBITS AND RESERVATION OF RIGHTS

Exhibit	Document Description	Pages
Exhibit A	Supplemental Brief for Petitioners, McNeil, et al. v. Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County, U.S. Supreme Court Docket No. 26-562 (November 2026) — replacing original Petition	22 pages
Exhibit B	Plaintiffs' Notice of Appeal (dated September 13, 2026; received September 22, 2026), South Carolina Court of Appeals Case No. 2026-002110	4 pages
Exhibit C	Email Chain (Aug. 19, 2026 – Oct. 26, 2026) Documenting Clerk's Refusal of Emailed Filing by Bonnie L. Campbell, Court Management Supervisor	4 pages
Exhibit D	Contemporaneous Handwritten Record of On-Site Request to Inspect Original Paper Filings (conducted November 19, 2026, at the Office of the Charleston County Clerk of Court pursuant to S.C. Code Ann. §§ 14-17-510 and 14-17-570)	Unknown at time of writing.

12. Plaintiffs preserve all constitutional, statutory, and appellate rights under the Fourteenth Amendment (Due Process and Equal Protection), Title II of the Americans with Disabilities Act, and South Carolina law. An unmolested, full-color, machine-readable copy of this filing and Exhibits A–C is archived publicly at **https://Scannergate.com/Nov-19-2026**.



13. South Carolina's state court system, like that of 27 other states, An AI-generated summary recently stated that this case ended with the August 3 Order and that Plaintiffs would not pursue further review. That was incorrect. Upon examining the AI's sources, it was discovered that the PLEASE TAKE NOTICE that Plaintiffs James C. ("Chris") McNeil and Meaghan Poyer, appearing pro se, hereby submit this Notice of Demand for Visibility Parity and request that the Clerk of Court docket this Notice, together with Exhibit A (Plaintiffs' Petition for a Writ of Certiorari to the Supreme Court of the United States) and Exhibit B (Plaintiffs' Notice of Appeal in South Carolina Court of Appeals Case No. 2026-002110), directly in their native, text-searchable digital PDF format. In support thereof, Plaintiffs state as follows:

VI. Proven Administrative Capability for Electronic Ingestion:

14. On August 19, 2026, Plaintiffs transmitted their Petition for a Writ of Certiorari via electronic mail, and the Court accepted and docketed that electronic submission onto the Public Index. That docketing confirms that the Clerk's Office possesses both the administrative authority and the technical capability to accept and docket electronic PDF submissions from self-represented litigants. However, before uploading the August 19, 2026 PDF, administrative staff printed the native digital file to physical paper and routed it through a scanner with all but 2 pages scanned at a quality of 1-bit bitonal, stripping the embedded vector text layer, degrading the visual evidence, and converting the file into an unindexed raster image.



VII. The Public Visibility and Automated Indexing Asymmetry:

15. While represented Defendants' e-filed pleadings and orders are uploaded to the Public Index as native, machine-readable vector PDFs, converting Plaintiffs' submissions into 1-bit scanned images creates a severe public-record distortion. Modern search engine indexers, legal-research aggregators, and Artificial Intelligence crawlers bypass resource-intensive, error-prone Optical Character Recognition (OCR) on degraded bitonal image files while indexing native vector text instantaneously. As a direct consequence, automated legal queries and public search summaries read only the represented Defendants' vector-text entries and erroneously report this action as concluded or inactive, erasing Plaintiffs' active appellate and constitutional tracks from public and institutional visibility.

VIII. Demand for Status-Neutral Visibility Parity:

16. To restore an accurate, machine-readable public record reflecting that this matter is actively proceeding before the South Carolina Court of Appeals (Case No. 2026-002110) and pending on Petition for a Writ of Certiorari before the Supreme Court of the United States, Plaintiffs respectfully demanded that the Clerk of Court upload a prior version of this Notice and the attached native-digital PDFs - Exhibit A (at that time the U.S. Supreme Court Petition for a Writ of Certiorari, now superseded by the Supplemental Brief filed November 13, 2026 and docketed November 17, 2026) and Exhibit B (Notice of Appeal) - directly to the Public Index in their native vector-text format without intermediate printing and re-scanning of the document body.



IV Turnkey Protocol for File-Stamping Without Vector-Text Destruction:

17. In case the Clerk of Court lacked native electronic stamping software comparable to that utilized by the South Carolina Supreme Court and Court of Appeals and therefore required a physical file-stamp impression on the first page, Plaintiffs provided a low-burden technical accommodation: in the email chain documented in Exhibit D, Plaintiffs advised the Clerk's Office that they may print and physically file-stamp Page 1 only, scan and email that single stamped page to Plaintiffs, and Plaintiffs would immediately return the complete PDF with the official file-stamp overlaid onto Page 1 using Plaintiffs' non-destructive Scannergate / Mirror Docket restoration software, which preserves the underlying native vector text layer across 100% of the filing and its exhibits for direct upload to the Public Index.

18. On October 26, 2026, while removing all of the counsel, judges, and court staff CC'ed on the original email chain, Court Management Supervisor Bonnie Campbell replied, in part, "The Clerk of Court does not accept emailed filing. Please mail the original to our office at the address below."



Respectfully submitted this 19th day of November, 2026.

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EXHIBIT A

Supplemental Memorandum and Appendix

filed November 13, 2026

United States Supreme Court No. 26-562

(To Petition for Writ of Certiorari, filed August 19, 2026)

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A only = 1-BIT BITONAL A + B + C = 8-BIT GRAYSCALE A + B + C + D + E = COLOR

No. _____

In the Supreme Court of the United States

JAMES C. "CHRIS" MCNEIL, ET AL.

Petitioners,

v.

COURT OF COMMON PLEAS OF SOUTH CAROLINA, NINTH JUDICIAL CIRCUIT, CHARLESTON COUNTY,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE SUPREME COURT OF SOUTH CAROLINA

SUPPLEMENTAL BRIEF

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Meaghan Poyer

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Pro Se Petitioners

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SUPPLEMENTAL BRIEF FOR PETITIONERS

On August 20, 2026, the Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County, demonstrated visual evidence degradation with the Supreme Court of the United States petition for a writ of certiorari addressing its visual evidence degradation.

In doing so, it also demonstrated the capability to accept and docket e-mailed filings from self-represented parties, which petitioners had requested as an ADA accommodation on January 30, 2026, to mitigate extreme PTSD (76 out of 80 PCL-5 score) acquired during the litigation through coordinated harassment and gaslighting by multiple parties, including the court itself.

In light of this self-authenticating event, should respondent waive or fail to file a substantive response by November 27, 2026, petitioners respectfully request that the Court call for a response pursuant to this Court's Rule 15.1 directing respondent to address the question presented in light of the unnecessary degradation of the Supreme Court of the United States petition in its August 20, 2026 docketing and its October 26–28, 2026 refusal of nondegrading electronic intake.

Upon receipt of respondent's response, the petition for a writ of certiorari should be granted for plenary review, or, in the alternative, the judgment below should be summarily reversed, or the petition should be granted, the judgment vacated, and the case remanded pursuant to *Mathews* v. *Eldridge*, 424 U. S. 319 (1976), *Village of Willowbrook* v. *Olech*, 528 U. S.

562 (2000), and *Tennessee* v. *Lane*, 541 U. S. 509 (2004).

I. The Degradation of the E-mailed Petition

Petitioners filed and served their petition on August 19, 2026. On the same day, petitioners e-mailed the respondent court, along with defense counsel, a native PDF of their petition for certiorari as an advance courtesy copy. The next morning, the clerk's office printed the e-mailed PDF onto paper, stamped the first page of both the 115-page petition and the 2-page proof of service, scanned those stamped pages at 8-bit grayscale quality, and scanned the remaining 114 pages of the petition and 1 page of the proof of service in 1-bit bitonal black-and-white, which degraded the full-color control photograph on page 7 of the petition into the same 1-bit monochrome format shown on facing page 6. App. to Suppl. Br. 1.

Then, rather than using the unmolested digital file as received, the clerk placed the degraded digital version of the petition on the county docket. They had to have printed out the digital PDF to paper rather than scanned a booklet because USPS tracking records demonstrate the mailed booklets did not arrive until August 24, four days after the docket entry.

This stacked another generation of 1-bit bitonal degradation on an already degraded image in the case of the "after" image of the degradation of the image of petitioner Meaghan Poyer in her home on page 6 of the petition. And the same 1-bit bitonal quality setting degraded the full-color "before" control photograph on page 7 of the petition so its quality was reduced to the "after" level of the scanned version of the image, preventing anyone encountering the petition

for a writ of certiorari on the lower court's docket from seeing the difference as intended.

Yet, by docketing the courtesy copy of the petition for a writ of certiorari, the court demonstrated it will docket a filing that was e-mailed to it by a self-represented litigant. However, it refused to repeat that act when asked to do so without the accompanying degradation of scanning.

II. Refusal to Docket Another E-mailed Filing Without Degradation Through Scanning

Petitioners submitted a filing on October 23, 2026, on the same e-mail thread through which they had transmitted the August 19 PDFs that respondent docketed on August 20. In that e-mail, petitioners wrote:

> "As set forth in the Notice, we respectfully request that this PDF be uploaded directly to the Public Index in its native, text-searchable vector PDF format without first printing the entire document to paper and re-scanning it into an image file, so that search indexers, legal software crawlers, and AI systems have status-neutral access to the machine-readable text of Plaintiffs' active appellate and Supreme Court filings."

In addition to requesting the digital docketing, petitioners offered a nondestructive stamping workflow that overlays the Clerk's physical page 1 stamp pixel-for-pixel onto the native PDF without stripping the underlying vector text layer or degrading embedded images.

On October 26 and 28, 2026, respondent removed the judges and opposing counsel from the e-mail chain

and replied, refusing with, "The Clerk of Court does not accept emailed filing. Please mail the original to our office at the address below" on October 28.

The court thus refused to docket the filing without the accompanying degradation, despite the offer of a solution enabling use of its physical stamp with a digital file and likely costing it less time and effort than the act of scanning a multiple-page paper filing.

Petitioners were able to offer that nondestructive stamp integration because petitioner McNeil had developed software for that purpose as part of Scannergate, of which the trial court had been notified through two post-petition filings: a September 4, 2026 notice announcing a free scan-quality testing portal for self-represented litigants in South Carolina civil cases at Scannergate.com, and a September 23, 2026 notice.

That September 23, 2026 notice announced a document-restoration proof of concept named Mirror Docket, which restores scanned *pro se* filings to full native quality by applying the Clerk's scanned page 1 stamp onto the original PDF without touching the vector text layer. McNeil offered that service at no cost or effort to the court beyond e-mailing a PDF of the stamped first page.

It is important to acknowledge the existence of the Scannergate scan-testing portal and accompanying Mirror Docket at the same website because they attracted the attention of self-represented litigants encountering similar evidentiary degradation through scanning in a different State. An October 20, 2026 *pro se* scanning degradation incident in an Ohio Court of Common Pleas was reported to petitioners through

the dedicated e-mail address published on the Scannergate website. App. to Suppl. Br. 2–5.

III. Ohio Court Scanning Degradation Incident

In *State* v. *Landenberger*, Case No. 2026 CR 00528 D, in the Court of Common Pleas of Portage County, Ohio, a self-represented litigant suffering from a severe speech disability e-mailed a 39-page emergency motion and Title II ADA accommodation request in native PDF format to the Clerk of Courts at 2:55 a.m. on October 20, 2026, ahead of a 9:00 a.m. pretrial hearing, pursuant to a local rule permitting e-mail transmission to the clerk.

The Ohio incident was reported to petitioners through the Scannergate contact channel by Nicholas Smith, who provided the docketed 32-page Emergency Master Motion and written permission at 4:01 a.m. on November 10, 2026, to reference *State* v. *Landenberger* in federal filings; his fiancé James Landenberger is drafting an original-jurisdiction petition to the Supreme Court of Ohio that cross-references this litigation.

At 9:14 a.m., a Clerk of Courts supervisor replied by e-mail confirming receipt.

At 9:43 a.m., she e-mailed again in reply, stating, "We will docket it now." The Portage County Clerk printed the e-mailed PDF onto paper and ran it through a scanner.

In the resulting 32-page docketed file, the final seven pages of the submission, including the litigant's proposed order for Title II ADA communication accommodations, were omitted; pages were scanned sideways and upside down; the machine-readable vector text layer was removed; and the filing was

degraded with heavy black-and-white speckling, wavy text distortion, and obscured exhibits. See App. to Suppl. Br. 3, 5–9. The trial court then proceeded as if the filing had not been read.

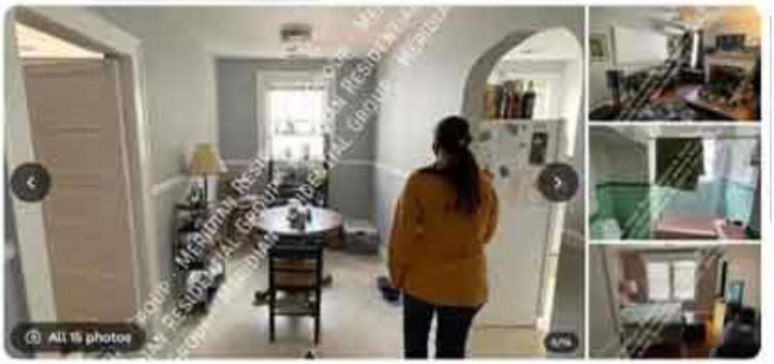
Together with respondent's August 20 docketing of petitioners' e-mailed petition, the Ohio incident demonstrates that electronic court access for self-represented litigants has two distinct components: electronic delivery, which removes the physical courthouse travel, parking, and security-gate friction that counsel bypass with one click, and native electronic docketing, which preserves visual evidence and machine-readable text for judicial review, legal software, and search crawlers.

When a court receives a native PDF by e-mail and still prints and scans it into a degraded image file, expending unnecessary additional clerical time and paper to produce an inferior record, it eliminates time-saving, cost-saving, and technical capability as explanations for the degradation.

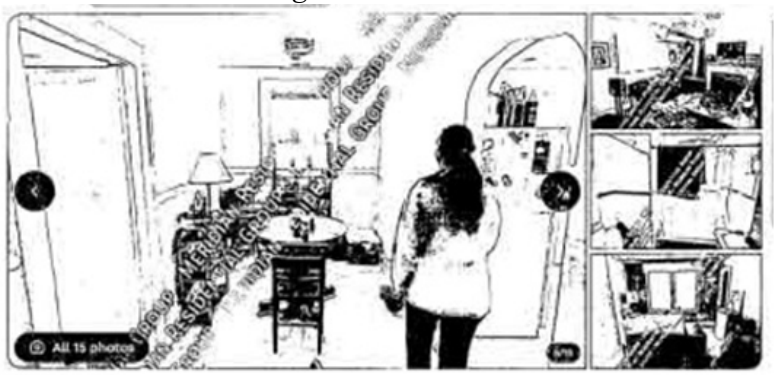
IV. Visual Comparison of the Petition Images Against the Lower Court's Docketed Scan

Following are the before-and-after images from the petition for a writ of certiorari as presented originally and as displayed on the Ninth Judicial Circuit's docket. The images have been cropped to the original image.

Below, the "before" image from the petition.



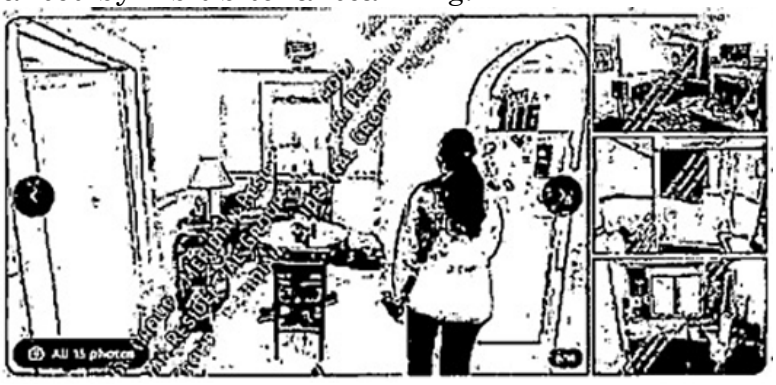
Below, the "after" image from the petition, demonstrating the 1-bit bitonal degradation of the first-generation scanned image.



Below, the "before" image as presented on the lower court docket, now a first-generation scan, and with the text still standing above it, stating "Panel 4 shows the same photograph as published on Realtor.com: a full-color interior in which a person with dark hair, wearing a mustard-gold garment, stands at the center of the frame."



Below, the "after" image as presented on the docket of the Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County, now a second-generation scan through the lower court's 1-bit bitonal scanning of a demonstration of the degradation caused by 1-bit bitonal scanning.



CONCLUSION

Should respondent waive or fail to file a brief in opposition by November 27, 2026, petitioners respectfully request that the Court call for a response pursuant to Rule 15.1 directing respondent to address the question presented in light of the August 20, 2026 docketing of an unnecessarily printed and scanned version of the Supreme Court petition, the October 26–28, 2026 refusal of nondegrading electronic intake, and the Ohio example demonstrating that the issue is not limited to South Carolina.

Upon receipt of respondent's response, the petition for a writ of certiorari should be granted for plenary review, or, in the alternative, the judgment below should be summarily reversed, or the petition should be granted, the judgment vacated, and the case remanded pursuant to *Mathews* v. *Eldridge*, 424 U. S. 319, 334–335 (1976); *Village of Willowbrook* v. *Olech*, 528 U. S. 562, 564–565 (2000); and *Tennessee* v. *Lane*, 541 U. S. 509, 522, 533–534 (2004).

Respectfully submitted.

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Pro Se Petitioners

NOVEMBER 2026

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Appendix A

P1A65 Fidelity Audit Summary

Source: Charleston County Public Index, Case No. 2025–CP–10–05095, Document Sequence P1A65 (docketed August 20, 2026). **SHA-256:** 04911ad06699ae68b58e695f515346463556941dfbc98ac585729e954bb396d0.
Audit Tool: 1 True Source Software as used in Scannergate (iTextSharp inventory).

PDF Page	XObject	Filter	Color Space
1	386	/DCTDecode	/DeviceGray
7	18	/CCITTFaxDecode	/DeviceGray
116	345	/DCTDecode	/DeviceGray

PDF Page	Bits	DPI X/Y	Luminance
1	8	300.00/249.07	256
7	1	300.00/255.00	1
116	8	300.00/243.22	256

The audit inventoried 117 pages in the docketed PDF. Page 1 and Page 116 are encoded in 8-bit grayscale (/DCTDecode).

The remaining 115 pages are encoded in 1-bit bitonal (/CCITTFaxDecode). All pages are stored at 300 DPI X 300 DPI.

The two grayscale pages correspond to the physically stamped first page of the 115-page Petition and the physically stamped first page of the 2-page Proof of Service. The 115 bitonal pages include the color comparator photograph on Petition page 7, which was reduced to the same 1-bit monochrome format as the degraded image on Petition page 6.

Appendix B

Ohio Comparator Authentication

From:	Robert N. S. Brooksmith
To:	chris thaut.io
Cc:	scannergate26@gmail.com
Subject:	Re: Inquiry
Date:	Monday, November 9, 2026 2:05:13 AM
Attachments:	searchresults.page 35.pdf Final James FINAL-output.pdf EMERGENCY FILING INSTANTER - Case No. 2026 CR 00528 D - State v.Landenberger - H.pdf

Hello,
Thanks for getting back to me I'm
Just trying everything at this point we are preparing a petition to the Supreme Court of Ohio to

The following verbatim quotes are drawn from the email thread supplied by Nicholas Scott Smith to Scannergate.com on November 8, 2026, and from the reply sent by Petitioner McNeil on November 9, 2026. The full email thread, with timestamps, is retained by Petitioners and is available upon request. A cropped screenshot of the timestamped reply is reproduced below.

> From Nicholas Scott Smith, November 8, 2026, 8:35 p.m.:
> My name is Nicholas Scott Smith y fiencee and I are fighting a city and a bank Pro Se currently in the summit county court of common pleas and we were doing quite well but the judge out of nowhere just dropped both of our cases on completely erroneous grounds and a few days later my fiencee get set up while on his lunch break at

work and thrown in jail held in a cell with a his cousin and defendant for the whole weekend on Monday as he is getting out I get arrested at probation on an illegal rich test after being forced to confess and thrown in jail immediately for the rest of the week at court on Friday my public defender refuses to represent me so I either go back to jail until Tuesday or represent myself. Do I did. I get released at 9:30 am with a report directly to probation order the jail holds me until 6:30 pm and releases me. Fast forward we then find out my fiencees lawyer is the same lawyer that refused to help me after sentencing the year prior and my fiencee was forced to try to advocate on my behalf. He is now his lawyer on some secret endorsement where they are obviously trying to use his cousin to set him up. So we work all night and file a petition for new council, act pro se in the interim, and an extension of deadlines and continuance and they did to his filing exactly what you describe happening to yours they cut out his ADA accommodation scanned it upside down and made it all wavy and illegible and cut out like seven pages worth of mandatory content some pages are even scaned sideways and worst part the issue is pretending like she did not read it and proceeding with his conflicted council filing a continuance on hi behalf. Thats where we are with that meanwhile over I our other case we just barely got our ninth district appeal filed in time but things are strange here too the judge it unexplocably overturned the sty of execution on our illegally stolen house and is sitting on our were not

Appendix B

motion for reconsideration. I am just wondering if you have any ideas on best way to handle this and if our case can help yours in my way I would be happy to help. Our case numbers are summit county Ohio CV–2025–07–3080, CV–2025–11–5504 and the related appeal let me know what you think. Sincerely Nicholas Scott Smith P.s. my Fiencee has never been arrested except for a DWI like a decade ago otherwise a clean record. And before this five year nightmare started with the city I did not either I was a Media Psychology professor for 15yrs and I have got an ABD Ph.D. And an Emmy Award if any of that helps in any way.

From Petitioner McNeil, November 9, 2026, 1:57 a.m.:

Mr Smith, Thanks for writing and I am really sorry about your experience. I am not sure what I can do to help but you can certainly use the scannergate portal to test the scan quality of the filings and have a page by page report using software libraries enabling other developers to replicate the results. But the docket check aspect built in is set up for the South Carolina civil case docket system. If you want to email me the filings, I will be glad to test. If we prevail in the US Supreme Court (just got docket number 26–562 on October 28) that could create a mandate for states to allow electronic filing access for pro se, I am not an attorney so cannot give legal advise but I will do what I can to help while respecting that boundary.

Appendix B

Best Chris McNeil Founder,
Thaut Systems Thinking-Based Consulting
Strategic Thought Leadership
Mobile [phone number redacted
http://thaut.io
Host of Podcast: Thought Leadership Studio
Forthcoming: Strategic Thought Leadership: The Book
LinkedIn https://www.linkedin.com/in/chris-mcneil-chs/

From Nicholas Scott Smith, November 9, 2026, 2:05 a.m.:
Hello, Thanks for getting back to me I am Just trying everything at this point we are preparing a petition to the Supreme Court of Ohio to stay all proceeding so anything you could identify would be of great help. I have included the email correspondence and the filed version vs the docketed version we have been trying for over two years now to get a lawyer and no one will help us so we have been going it alone for over 18 months now and as three days after the summit county Jude issued a slew of rulings dismissing both our cases this happened on James lucnch break at work. Thanks again Best, Nick Scott Smith

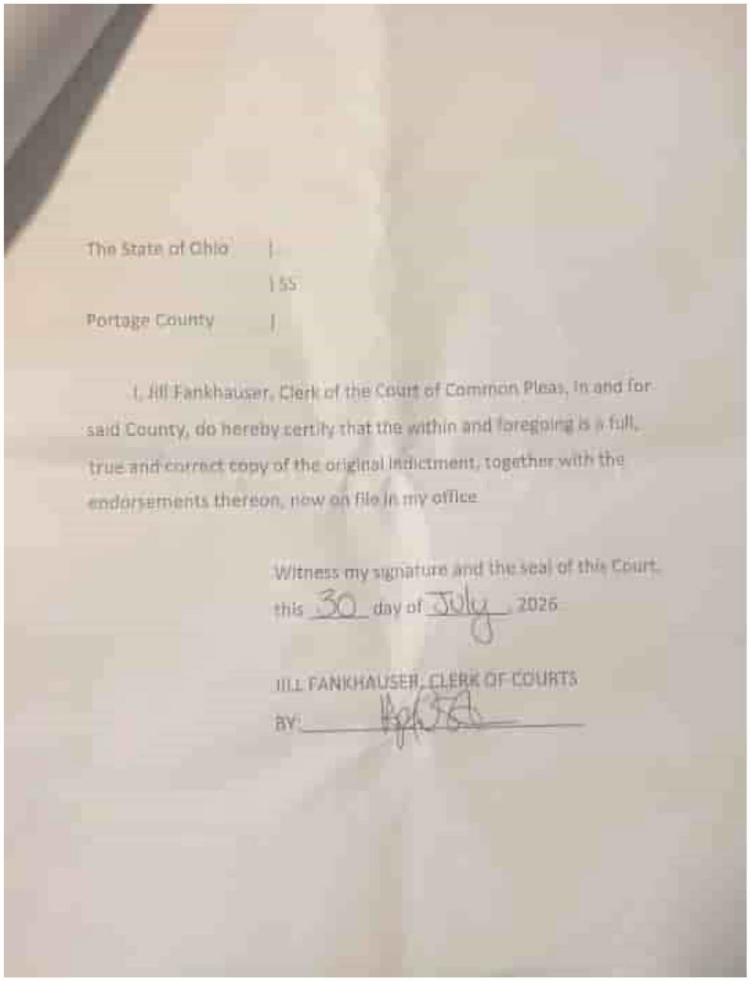
Note: The attached PDFs include the 39-page native emergency motion filed at 2:55 a.m. on October 20, 2026, and the 32-page degraded docketed version showing the omitted pages and orientation errors described in Section III of this Brief.

Appendix C

Ohio Comparator Visual Panel

The panel below places the original native-PDF pages (left) beside the degraded docketed scans (right) from State v. Landenberger, Portage County Court of Common Pleas, Ohio.

Page 26 before



The State of Ohio)
) SS
Portage County)

I, Jill Fankhauser, Clerk of the Court of Common Pleas, in and for said County, do hereby certify that the within and foregoing is a full, true and correct copy of the original indictment, together with the endorsements thereon, now on file in my office.

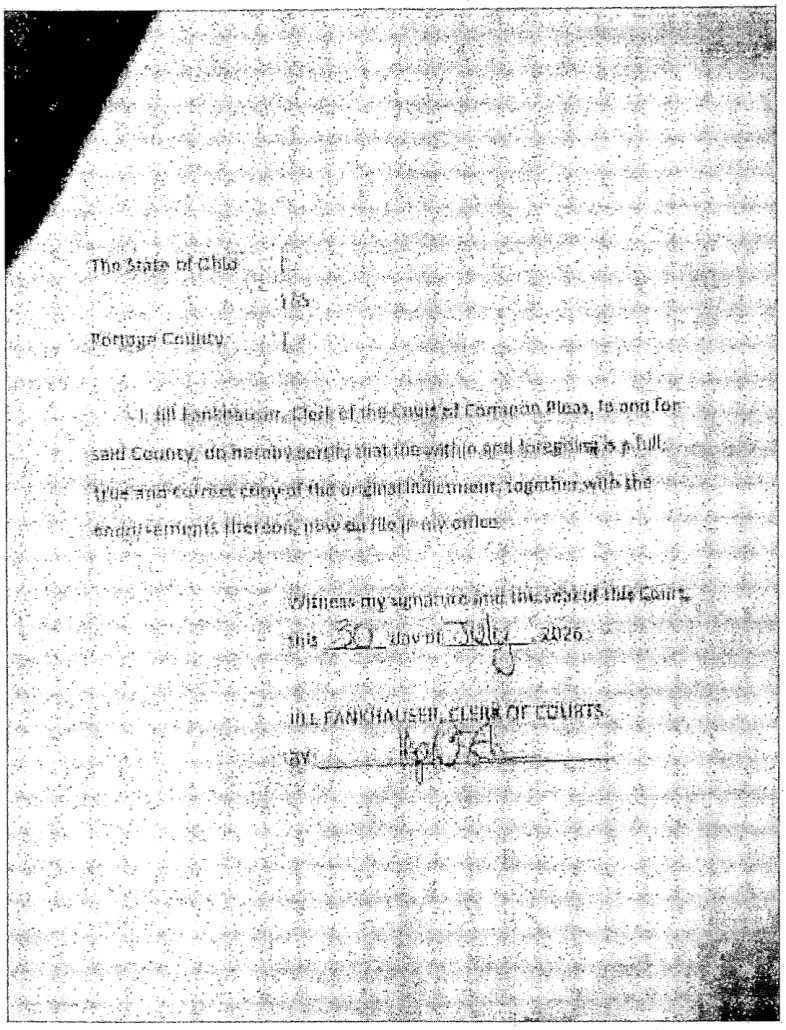
Witness my signature and the seal of this Court, this 30 day of July, 2026.

JILL FANKHAUSER, CLERK OF COURTS

BY: _____

Appendix C

Page 26 after



The State of Ohio }
} ss
Portage County }

I, Jill Fankhauser, Clerk of the Court of Common Pleas, in and for said County, do hereby certify that the within and foregoing is a full, true and correct copy of the original indictment, together with the endorsements thereon, now on file in my office.

Witness my signature and the seal of this Court, this 30 day of July 2026.

JILL FANKHAUSER, CLERK OF COURTS

BY: _____

Appendix C

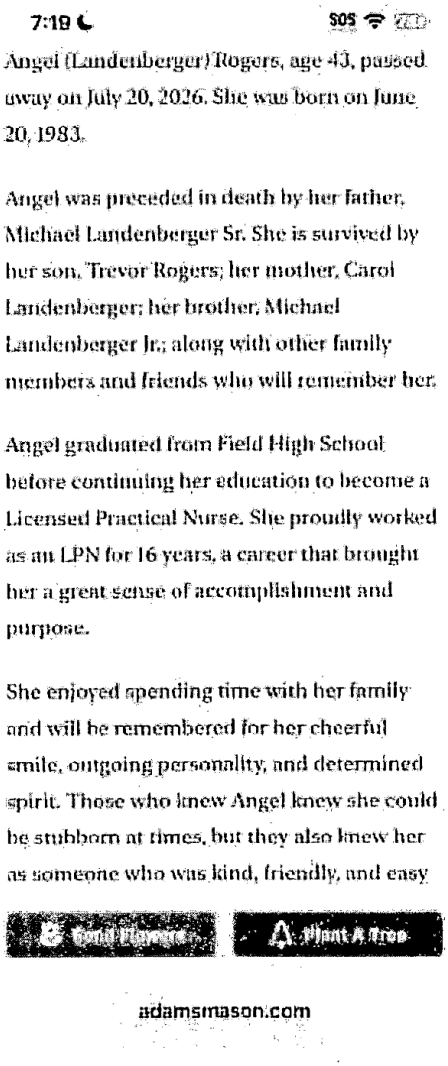
The docket version of Page 31 is not only degraded, but inverted, putting it upside down.

Page 31 before



Appendix C

Page 31 after



7:19 SOS

Angel (Landenberger) Rogers, age 43, passed away on July 20, 2026. She was born on June 20, 1983.

Angel was preceded in death by her father, Michael Landenberger Sr. She is survived by her son, Trevor Rogers; her mother, Carol Landenberger; her brother, Michael Landenberger Jr.; along with other family members and friends who will remember her.

Angel graduated from Field High School before continuing her education to become a Licensed Practical Nurse. She proudly worked as an LPN for 16 years, a career that brought her a great sense of accomplishment and purpose.

She enjoyed spending time with her family and will be remembered for her cheerful smile, outgoing personality, and determined spirit. Those who knew Angel knew she could be stubborn at times, but they also knew her as someone who was kind, friendly, and easy

Send Flowers Plant A Tree

adamsmason.com

EXHIBIT B

Notice of Appeals filed September 22, 2026



RECEIVED
Sep 22 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Will Wheeler, Circuit Court Judge

Case No. 2025-CP-10-05095

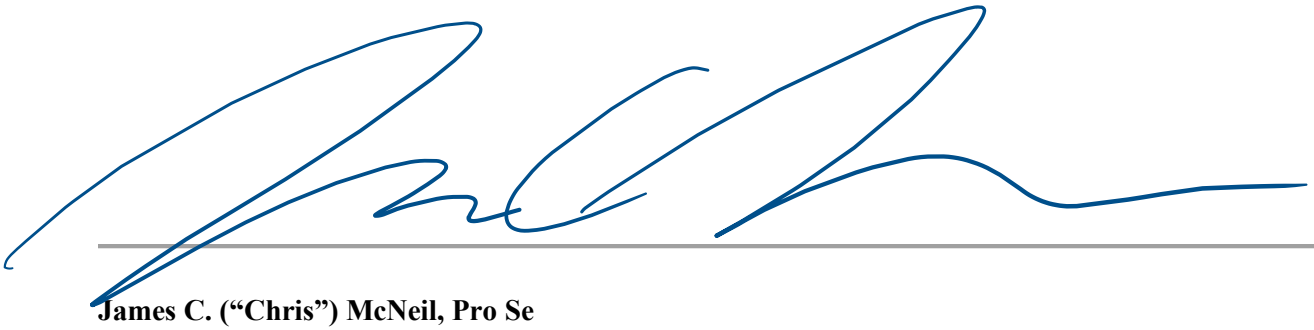
James C. ("Chris") McNeil and Meaghan Poyer..... Appellants,

SAC 181, LLC, Meridian Residential Group, LLC,
Adam W. Bayles, individually, Tara Bayles, Individually,
and MRG Investing Company, LLC ..... Respondents.

NOTICE OF APPEAL

James C. ("Chris") McNeil and Meaghan Poyer, Appellants pro se, hereby appeal the Order of the Honorable Will Wheeler, dated August 3, 2026, and the subsequent Order of Denial of Plaintiffs' Motion to Alter or Amend Judgment Pursuant to Rule 59(e), SCRCP, dated August 14, 2026. Appellants received written notice of entry of the August 14, 2026 Order on or about August 20, 2026, by means of the Rule 77 notice mailed by the Charleston County Clerk of Court on August 17, 2026. A copy of the Order on Appeal is provided herewith. A copy of this Notice is being provided to the Clerk of Court of Charleston County Court of Common Pleas and all counsel of record.

Respectfully submitted this 13th day of September, 2026.



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



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

RECEIVED
Sep 22 2026
SC Court of Appeals

CERTIFICATE OF SERVICE

Documents Served: Notice of Appeal (dated September 13, 2026)

Dates of Service: September 13, 2026 (via Electronic Mail) and September 14, 2026 (via United States Postal Service Certified Mail)

Address List:

- **Alicia Bolyard, Esq.** (abolyard@rlattorneys.com)
  Resnick & Louis, P.C.
  146 Fairchild St, Suite 130, Daniel Island, SC 29492
  Counsel for Respondents Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles
- **Christopher Manning, Esq.** (cmanning@rlattorneys.com)
  Resnick & Louis, P.C.
  146 Fairchild St, Suite 130, Daniel Island, SC 29492
  Counsel for Respondents Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles
- **Kevin O'Brien, Esq.** (kevin.obrien@phelps.com)
  Phelps Dunbar LLP
  4300 Edwards Mill Rd, Suite 600, Raleigh, NC 27612
  Counsel for Respondent SAC 181, LLC
- **Jeffrey Kuykendall, Esq.** (jeff@jwklegal.com)
  321 Wingo Way, Suite 201, Mount Pleasant, SC 29464
  Counsel for Respondent MRG Investing Company, LLC
- **Holly Palmer Beeson, Esq.** (hbeeson@llr.sc.gov)
  South Carolina Department of Labor, Licensing and Regulation (SC LLR)
  110 Centerview Dr., Columbia, SC 29210
  Counsel for Subpoena Recipient SC LLR
- **Graham Smith Mitchell, Esq.** (graham.mitchell@nelsonmullins.com)
  Nelson Mullins Riley & Scarborough LLP
  Meridian, 1320 Main Street, 17th Floor, Columbia, SC 29201
  Counsel for Subpoena Recipients Pinnacle Bank / Synovus Bank

I, James C. McNeil, do hereby certify that on September 13, 2026, I served true and correct copies of the attached Notice of Appeal upon the aforementioned counsel of record at their designated electronic mail addresses listed above.

Dated: September 13, 2026



James C. McNeil, Appellant Pro Se
P.O. Box 30386
Charleston, SC 29417

I, Meaghan Poyer, do hereby certify that on September 14, 2026, I deposited true and correct copies of the attached Notice of Appeal in the United States Mail via Certified Mail, return receipt requested, properly addressed to the respective counsel of record at their physical firm addresses listed above.

Dated: September 14, 2026



Meaghan Poyer, Appellant Pro Se
P.O. Box 30386
Charleston, SC 2941

EXHIBIT C

Email Thread of October 23, 2026 to October 26, 2026

In Which Court Management Supervisor Bonnie Campbell

Refused to Docket Emailed Pro Se Filing

SCAN-MODE FLAG STRIP

ALL MODES	GRAY+COLOR	GRAY+COLOR	COLOR ONLY	COLOR ONLY
A	B	C	D	E

A only = 1-BIT BITONAL A + B + C = 8-BIT GRAYSCALE A + B + C + D + E = COLOR

From:	Bonnie Campbell
To:	chris thaut.io
Subject:	RE: U.S. Supreme Court Petition for Writ of Certiorari | McNeil and Poyer v. Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County | filed August 19, 2026 (Courtesy Copy)
Date:	Monday, October 26, 2026 10:39:16 AM
Attachments:	image001.png

Good morning,
The Clerk of Court does not accept emailed filing. Please mail the original to our office at the address below. If you wish to receive copies, please include however many copies you want file stamped along with a self addressed stamped envelope for them to be returned.

Thanks.

Bonnie L. Campbell
Court Management Supervisor
100 Broad Street, Ste. 106
Charleston, S.C. 29401
843-958-5004
CourtPlus®

From: Randal Evers <REvers@charlestoncounty.org>
Sent: Monday, October 26, 2026 7:53 AM
To: Bonnie Campbell <BCampbell@charlestoncounty.org>
Subject: FW: U.S. Supreme Court Petition for Writ of Certiorari | McNeil and Poyer v. Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County | filed August 19, 2026 (Courtesy Copy)

From: chris thaut.io <chris@thaut.io>
Sent: Friday, October 23, 2026 5:15 PM
To: Kevin.O'Brien@phelps.com; abolyard@rlattorneys.com; cmanning@rlattorneys.com; jwkuykendall@jwklegal.com; jeff@jwklegal.com; holly.beeson@llr.sc.gov; Edward L. Knisley <EKnisley@charlestoncounty.org>; Andrew L Hethington <ALHethington@charlestoncounty.org>; Clerk Of Court <clerkofcourt@charlestoncounty.org>; ngex@grsm.com; bbihun@grsm.com
Cc: mcneilandpoyer@gmail.com; ksigler@rlattorneys.com; kstapleton@rlattorneys.com; debra.rizzi@phelps.com; cynthia.wenstrand@phelps.com; graham.mitchell@nelsonmullins.com; Joy Johnson <JSJohnson@charlestoncounty.org>; Angela Rigney <ARigney@CharlestonCounty.org>; supctfilings@sccourts.org; jmccoyj@sccourts.org; trodej@sccourts.org; dvanslambrookj@sccourts.org
Subject: RE: U.S. Supreme Court Petition for Writ of Certiorari | McNeil and Poyer v. Court of

CAUTION: This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

To the Clerk of Court and Charleston County Court of Common Pleas Administration:

Attached for electronic docketing in Case No. 2025-CP-10-05095 (consistent with the Court's prior electronic ingestion and docketing of Plaintiffs' August 19, 2026 email submission on August 20, 2026) is Plaintiffs' Notice of Demand for Visibility Parity and Direct Native-PDF Docketing of Exhibits A and B, which includes:

- Plaintiffs' Notice of Demand for Visibility Parity;
- Exhibit A: Petition for a Writ of Certiorari to the Supreme Court of the United States; and
- Exhibit B: Plaintiffs' Notice of Appeal (Court of Appeals Case No. 2026-002110).

As set forth in the Notice, we respectfully request that this PDF be uploaded directly to the Public Index in its native, text-searchable vector PDF format without first printing the entire document to paper and re-scanning it into an image file, so that search indexers, legal software crawlers, and AI systems have status-neutral access to the machine-readable text of Plaintiffs' active appellate and Supreme Court filings.

Accommodation if Physical Stamping is Required:
If your office does not yet have electronic stamping software (as the South Carolina Supreme Court and Court of Appeals use) and needs to apply a physical file stamp, please print and stamp Page 1 only and email that stamped first page back to me at chris@thaut.io. I will immediately return the complete file with your official stamp cleanly overlaid onto Page 1 using our Scannergate / Mirror Docket software, which applies the stamp without damaging the underlying vector text layer across the filing and Exhibits A and B.

By copying all counsel of record on this email, Plaintiffs contemporaneously effect electronic service of this filing.

Respectfully,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se

PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

———————

Chris McNeil
Founder, Thaut
Systems Thinking-Based Consulting
Strategic Thought Leadership
Mobile 843.818.3495
http://thaut.io
Host of Podcast: *Thought Leadership Studio*

Forthcoming: *Strategic Thought Leadership: The Book*

LinkedIn
https://www.linkedin.com/in/chris-mcneil-chs/

From: chris thaut.io
Sent: Wednesday, August 19, 2026 7:11 PM
To: Kevin.O'Brien@phelps.com; abolyard@rlattorneys.com; cmanning@rlattorneys.com; jwkuykendall@jwklegal.com; jeff@jwklegal.com; holly.beeson@llr.sc.gov; eknisley@charlestoncounty.org; alhethington@charlestoncounty.org; clerkofcourt@charlestoncounty.org
Cc: mcneilandpoyer@gmail.com; ksigler@rlattorneys.com; kstapleton@rlattorneys.com; debra.rizzi@phelps.com; cynthia.wenstrand@phelps.com; graham.mitchell@nelsonmullins.com; JSJohnson@charlestoncounty.org; arigney@charlestoncounty.org; supctfilings@sccourts.org; jmccoyj@sccourts.org; trodej@sccourts.org; dvanslambrookj@sccourts.org
Subject: U.S. Supreme Court Petition for Writ of Certiorari | McNeil and Poyer v. Court of Common Pleas of South Carolina, Ninth Judicial Circuit, Charleston County | filed August 19, 2026 (Courtesy Copy)

Counsel and Clerks:

Attached is

- A courtesy copy of the *Petition for a Writ of Certiorari* in the above-captioned matter (McNeil, et ux Petition.pdf), filed today with the Supreme Court of the United States (McNeil, et ux Petition.pdf) ,

- Certificate of Compliance and Service. (Proof_of_Service.pdf)

The petition presents the question:

Whether the Due Process and Equal Protection Clauses of the Fourteenth Amendment permit a court to reserve electronic access for licensed attorneys, forcing self-represented litigants to use a paper intake that degrades the integrity of evidentiary exhibits central to their claims.

Formal service is by UPS and United States Postal Service Priority Mail as set out in the attached certificate. Tracking numbers to follow.

We will supply the docket number once the Clerk of the Supreme Court assigns it.

This email is a courtesy copy and does not constitute formal service.

Respectfully,

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

———————

Chris McNeil
Founder, Thaut
Systems Thinking-Based Business and Litigation Consulting
Strategic Thought Leadership
Mobile 843.818.3495
http://thaut.io
Host of Podcast: *Thought Leadership Studio*

Forthcoming: *Strategic Thought Leadership: The Book*

LinkedIn
https://www.linkedin.com/in/chris-mcneil-chs/

EXHIBIT D

Contemporaneous On-Site Audit of Retained Original Paper Filings



REQUEST TO INSPECT ORIGINAL PAPER FILINGS

Office of the Charleston County Clerk of Court, 100 Broad Street, Suite 106, Charleston, SC 29401

Case: McNeil and Poyer v. SAC 181, LLC, et al.
Case No.: 2025-CP-10-05095 (Common Pleas)

Requested by: James C. McNeil and Meaghan Poyer, self-represented Plaintiffs
Date: November 19, 2026 **Time:** 3:17 PM

We are parties to this case. This is a record of the response of the Clerk of Court to our asking to look at the paper originals of four of our filings, as they were handed in or received by this office, including every exhibit page (S.C. Code Ann. § 14-17-570):

1. Plaintiffs' Motion for Leave to File a Second Amended Complaint, filed October 24, 2025, with its exhibits (Exhibit C series, color photographs).
2. Plaintiffs' Systems Analysis Brief in Aid of Judicial Efficiency, filed March 6, 2026, with its exhibits.
3. Plaintiffs' Notice of Pre-Hearing Safety and Case-Management Matters, filed May 11, 2026, with its exhibits.
4. The paper from which this office scanned the Petition for a Writ of Certiorari docketed in this case on August 20, 2026.
5.

If the paper for any item is held somewhere else, or is no longer held, please tell us where it is now, or the date and manner of its disposition. We are glad to wait or to come back at a time you name.

Record of response (completed by Plaintiffs at the Clerk's Office and filed as Exhibit D in the Plaintiffs Notice of Demand for ….)

James C. McNeil and Meaghan Poyer at Clerk of Court counter at 100 Broad St.

James C. McNeil: (to African American gentleman at counter). (read opening paragraph on this page stating. "We are parties to this case".

clerk: "what's on the docket is the official record".

McNeil: Per S.C. 14-17-580 (in essence) you have to keep a copy that was available to parties for review — in the form available to parties for review — in the form that was scanned, not as docketed.

clerk: (leaves us for a few minutes). I was told by my supervisor that we do not provide these to the public

(continued on page 2 at clerk visit)

page 2 of clerk visit documentation

McNeil then asked for the name of the clerk's supervisor and the clerk refused.

McNeil & Poyer both told the clerk they are not just "the public" but are parties to the case.

McNeil gave the clerk the "1. South Carolina Statutory & Records Retention Quick Reference" table included after tearing the page just below it.

The clerk left the counter for about 10 minutes.

He returned with the "3.1.3 Documents Kept as Electronic (Digital) Images"

McNeil & Poyer went to the "file Viewing Area" (room 112) to write this.

They are now returning to ask "what happens to the original paper copies."

and "who is your supervisor, and what is your name?" and ask for the above I more time. If this end, here, no further info was given.

Item	Paper produced?	If produced: color exhibits present, pages counted. If held elsewhere or no longer held: what was said
1	[ ] Yes [X] No	
2	[ ] Yes [X] No	
3	[ ] Yes [X] No	
4	[ ] Yes [X] No	
Other		Any other instruction given, or a person or office to contact:

Staff name and title: would not give - African-American Gentleman

1. South Carolina Statutory & Records Retention Quick Reference

Keep these verified authorities handy at the counter if staff question your right to inspect original paper filings or claim originals were discarded after scanning:

Authority	Key Rule for Counter Inspection & Retention
S.C. Code Ann. § 14-17-570	Books and records must remain in the Clerk's office, and the Clerk "shall at all times permit either party to a suit, or his agent or attorney, to inspect or copy, during the pendency of suit, any papers pertaining thereto without charge."
S.C. Code Ann. § 14-17-510	Requires the Clerk to "file in their proper order original papers in causes instituted" and "preserve with care all papers, books and furniture pertaining to or connected with his office."
S.C. Code Ann. § 14-17-580 & § 14-17-595	§ 14-17-580 holds the Clerk responsible for all books and papers; § 14-17-595 authorizes computer maintenance while still requiring paper or microfilm records in specified instances.
S.C. Code Ann. § 30-1-130 & § 30-1-140	Public Records Act governs microfilming/photocopying and lawful disposal of originals; § 30-1-140 makes refusal or willful neglect of statutory public-record duties a misdemeanor.
SCDAH Schedules & Form ARM-11 / SCACR Rule 606	County Clerk of Court records follow Retention Schedules in the SC Judicial Department Clerk of Court Manual (prepared with SCDAH). Any lawful destruction under general schedules requires filing Form ARM-11 (Report on Records Destroyed) with SCDAH. Under SCACR Rule 606, civil trial exhibits must be kept at least 60 days after verdict or appellate remand.

2. Two-Party Physical Inspection Checkpoints (Chris & Meaghan)

Checkpoint A: October 24, 2025 Motion for Leave for Second Amended Complaint

Audit Note: The docket copy has 165 pages (159 bitonal, 6 grayscale, 0 color) vs. 162 pages in the as-filed PDF because the docket adds a 2-page SCCA 233 coversheet (Docket pp. 1–2) and two versions of the Retaliation Timeline in Exhibit N (Docket pp. 140–141). Both versions originally had full-color exhibits.

Target Feature in Oct. 24, 2025 Paper Original	Present?	Full Color?	2-Party Initials
Physical paper original located & total page count confirmed (Count: _____)	[ ] Yes [ ] No	[ ] Yes [ ] No	JM: ____ MP: ____
Exhibit C color photographs & property/Zillow/Redfin/Realtor screenshots	[ ] Yes [ ] No	[ ] Yes [ ] No	JM: ____ MP: ____
"Housing Our Future" Charleston County color charts (Docket pp. 130–136)	[ ] Yes [ ] No	[ ] Yes [ ] No	JM: ____ MP: ____

Checkpoint B: March 6, 2026 Systems Analysis Brief — Exact Missing & Reordered Pages Audit

Audit Note: Submitted as 165 full-color pages; docketed as 157 pages (144 bitonal, 13 grayscale, 0 color) = exactly 8 pages missing plus 4 pages scanned in reverse order. Flip directly to these target pages in the Clerk's paper original:

Orig. Page	Docket Pg.	Discrepancy & Exact Content to Check	In Paper?	Color / Init.
p. 9	p. 9	Exhibit A cover: handwritten "Exhibits" added top-right on docket scan.	[ ] Match [ ] Diff	[ ] Color JM:__ MP:__
pp. 70–73	pp. 73–70	REVERSED ORDER (4 pp., Exhibit G): Orig 70 (Tara email)->73; Orig 71 (texts)->72; Orig 72 (LinkedIn)->71; Orig 73 (Meridian bio)->70.	[ ] Correct [ ] Rev.	[ ] Color JM:__ MP:__
p. 93	**OMITTED**	MISSING #1: Cover sheet "EXHIBIT E: Affidavit of Meaghan Poyer: High Cost of Lawfare Part II".	[ ] Yes [ ] No	[ ] Color JM:__ MP:__
p. 102	**OMITTED**	**MISSING #2 (CRITICAL EVIDENCE): "PCL-5 PTSD Assessment Interpretation" (76/80 score, 95th percentile severity, Severe PTSD >=60).**	[ ] Yes [ ] No	[ ] Color JM:__ MP:__
p. 118	**OMITTED**	MISSING #3: Cover sheet "EXHIBIT M (1) : BOLYARD OF RESNICK & LOUIS OCTOBER 16, 2025 EMAIL".	[ ] Yes [ ] No	[ ] Color JM:__ MP:__
pp. 122–125	**OMITTED**	MISSING #4–7 (4 pp.): First copy of Exhibit M(2) Meridian Oct. 9, 2025 Answer & Crossclaim (cover + 3-page excerpt before M2 overview).	[ ] Yes [ ] No	[ ] Color JM:__ MP:__
p. 127	**OMITTED**	MISSING #8: Cover sheet "EXHIBIT M(2) : MERIDIAN ANSWER AND CROSSCLAIM (OCTOBER 9, 2025)" (after M2 overview).	[ ] Yes [ ] No	[ ] Color JM:__ MP:__
pp. 153–154	pp. 145–146	Color/Legibility Spot Check: LLR Oct. 2, 2025 letter & p. 147 green SMS bubbles (severely blackened/speckled on 1-bit docket scan).	[ ] Clean [ ] Deg.	[ ] Color JM:__ MP:__

Clerk refused

3. Clerk Office Policy Questionnaire (Record Verbatim Answers)

Ask calmly and factually. Record the staff member's full name, title, and exact words (or note if they decline to answer or refer you to a supervisor).

(provided by clerk of Court staff)

3.1.3 Documents Kept as Electronic (Digital) Images

Documents kept as electronic (digital) images

Documents filed as electronic images or documents that have been converted to electronic images and are maintained in a certified document management system or certified digital records-keeping system are permanent records.

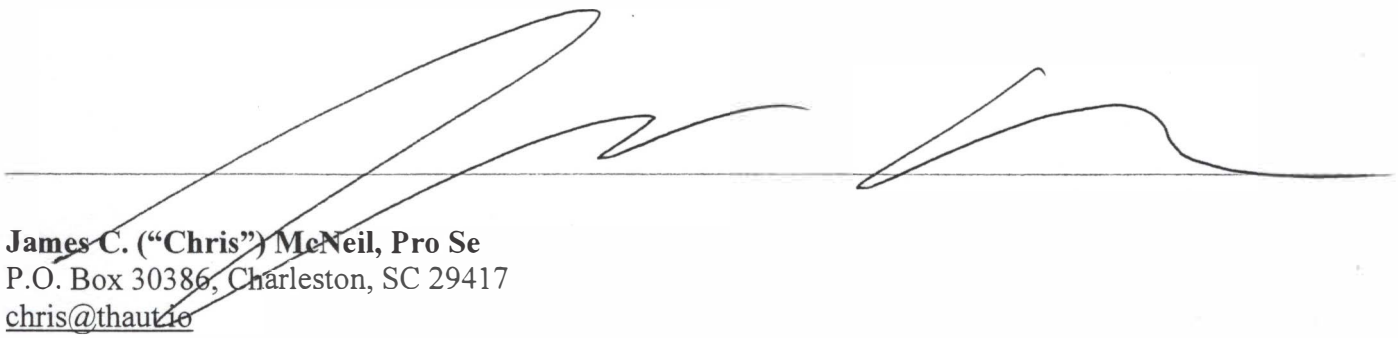
To be certified means that the document management system or digital records-keeping system has been certified by the South Carolina Department of Archives and History (SCDAH). (Reference the Public Records Stored as Digital Images: Policy Statement (Public Records Information Leaflet #13) and Trustworthy Information System Handbook and the Electronic Management Guidelines).

The South Carolina Judicial Department's SC Courts E-Filing System, South Carolina Appellate Case Management System, Bar Admissions System and the Trial Court Case Management System (CMS) for the hosted counties whose document images reside in the CMS at the SCJD are certified by the South Carolina Department of Archives and History and the meet the SCDAH's retention requirements.

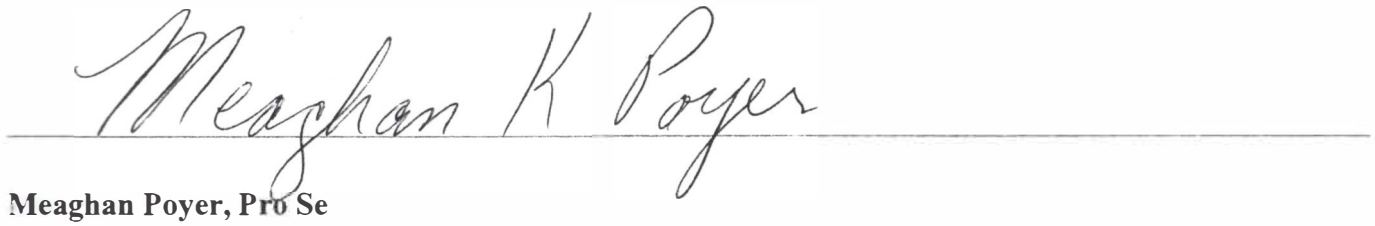
https://www.sccourts.org/clerkmanual/Chapter3#3.1.3

4. Contemporaneous Two-Party Verification & Sign-Off

Respectfully submitted this 19th day November,2026.



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