

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Hugh T. Watson.....Appellant

v.

Hayward Baker, Inc., Keller North America, Inc., and Ground Technology d/b/a D'Appolonia
Engineering Division of Ground Technology, Inc.,.....Respondents

Case No.: 2023-CP-37-00329

NOTICE OF APPEAL

Hugh T. Watson appeals the Orders of the Honorable R. Lawton McIntosh granting summary judgment to Ground Technology, Inc. and Keller North America, Inc.¹, dated February 14, 2025 and February 19, 2025, respectively (collectively referred to as the “Orders”). Appellant received written notice of the entry of the Orders through the e-filing system on the date each was filed. Appellant then filed Motions to Alter or Amend pursuant to Rule 59(e), SCRCP, as to Ground Technology on February 24th and as to Keller on February 28th. These motions were denied by a single Form 4 order issued March 13, 2025, which order was received by Appellant through the e-filing system on the date it was filed.

Counsel for the parties are as follows:

¹ The Court included defendant Hayward Baker, Inc. in the order as to Keller North America, finding that Keller was a successor by merger to Hayward Baker, Inc.

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Respectfully submitted,

s/ K. Jay Anthony

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Attorneys for Appellant

Greenville, South Carolina
March 19, 2025

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SC Court of Appeals

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PROOF OF SERVICE

I certify that I filed the Notice of Appeal with the South Carolina Court of Appeals,
electronically and served a copy on Respondent's and to the South Carolina Court of Appeals
Clerk of Court, by depositing a copy of it in the United States Mail, postage prepaid, on [insert
date] addressed as follows:

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SC Court of Appeals

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Re: *Hugh Watson vs. Hayward Baker, Inc., et al*
Civil Action 2023-CP-37-00329

Dear Ms. Kitchings:

We represent the Plaintiff / Appellant in the above referenced case. Enclosed for filing, please find a Notice of Appeal as well as our check for \$250 for the filing fee. Also enclosed is the copy of the Order which is to be challenged.

All counsel of record have also been copied on this filing.

Best Regards,

Julianna Wolfla
Paralegal to K. Jay Anthony

KJA:jw
Enclosures
Cc: All Counsel of Record