

RECEIVED

Aug 11 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM AIKEN COUNTY

Court of Common Pleas

The Honorable Patrick C. Fant, III

Circuit Court Case No. 2023-CP-02-01719

Appellate Case No. 2024-002137

Deborah Denise Harley,

Respondent,

v.

D.R. Horton, Inc. and Plumbing
Solutions, LLC,

Defendants,

of Which D.R. Horton, Inc. is the

Appellant.

PROOF OF SERVICE

The undersigned does hereby certify that on August 11, 2025, the Final Brief of Appellant and Final Reply Brief of Appellant were served by email on all counsel of record as follows. A copy of the sent email is enclosed as **Exhibit 1** with this Proof of Service.

[SIGNATURE PAGE TO FOLLOW]

s/ David L. Paavola
John T. Crawford Jr., SC Bar No.: 69682
Kimila L. Wooten, SC Bar No.: 64516
David L. Paavola, SC Bar No.: 100714
W. Jacob Henerey, SC Bar No.: 102268
Amelia Farmer, SC Bar No.: 105750
KENISON, DUDLEY & CRAWFORD, LLC
325 McBee Ave., Suite 301
Greenville, SC 29601
(864) 242-4899
(864) 242-4844
crawford@conlaw.com
wooten@conlaw.com
paavola@conlaw.com
henerey@conlaw.com
farmer@conlaw.com
Attorneys for Appellant

August 11, 2025

Other counsel of record:

LYLES & ASSOCIATES, LLC
Robert T. Lyles, Jr., Esq.
Joseph Daniel Winterstein, Esq.
1037 Chuck Dawley Blvd., Suite G-100
Mt. Pleasant, SC 29464
T 843-577-7730
F 843-577-7172
Email: rtl@lylesfirm.com
jdw@lylesfirm.com

Counsel for Respondent Deborah Denise Harley

CLEMENT RIVERS, LLP
Catherine Holland Chase, Esq.
Willam A. Dennis, Jr. Esq.
PO Box 993
Charleston, SC 29402-0993
T 843-720-5488
Email: cchase@ycrlaw.com
bdennis@ycrlaw.com

Counsel for Plumbing Solutions, LLC

EXHIBIT 1

From: [Natascha Genc](#)
To: rtl@lylesfirm.com; jdw@lylesfirm.com; cchase@ycrlaw.com; bdennis@ycrlaw.com
Cc: [John Crawford](#); [Kim Wooten](#); [David Paavola](#); [Jacob Henerey](#); [Amelia Farmer](#); [Angelia Shaw](#); [Cara Smith](#); [Jessica Barrette](#); [Tammie Aycock](#)
Subject: Deborah Denise Harley v D.R. Horton, Inc. and Plumbing Solutions, LLC (Case No. 2024-002137)
Date: Monday, August 11, 2025 2:44:00 PM
Attachments: [25.08.11 Harley DRH Final Brief FINAL.pdf](#)
[25.08.11 DRH Final Reply Brief FINAL.pdf](#)
[image001.png](#)

Dear Counsel:

Attached please find the Final Brief of Appellant and Final Reply Brief of Appellant in the above-referenced matter. The Record on Appeal, Final Briefs of Appellant, and Proof of Service will be filed with the Court of Appeals shortly.

With kindest regards,



Natascha Genc
Paralegal
KENISON, DUDLEY & CRAWFORD, LLC
325 W. McBee Avenue, Suite 301
Greenville, SC 29601
Email: genc@conlaw.com
Main: (864) 242-4899
Website: www.conlaw.com

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Kenison, Dudley & Crawford, LLC by replying to this email and delete the original and reply emails. Thank you.