

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

RECEIVED

Patrick C. Fant, III, Circuit Court Judge

AUG 13 2025

Appellate Case No.: 2024-002137

SC Court of Appeals

Deborah Denise Harley ..... Respondent,

v.

D.R. Horton, Inc., Plumbing Solutions, LLC, and John Does 1-15 ..... Defendants,

Of which, D.R. Horton, Inc. is the ..... Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Final Brief to the following counsel of record via electronic mail on August 11, 2025, as follows:

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  
crawford@conlaw.com  
wooten@conlaw.com  
paavola@conlaw.com  
henerey@conlaw.com  
farmer@conlaw.com  
*Attorneys for Appellant*

s/Robert T. Lyles, Jr.

Robert T. Lyles, Jr. (SC Bar No. 10299)  
Joseph Daniel Winterstein (SC Bar No. 105344)  
Lyles & Associates, LLC  
2113 Middle Street, Suite 202  
Sullivan's Island, South Carolina 29482  
(843) 577-7730  
[rtl@lylesfirm.com](mailto:rtl@lylesfirm.com)  
[jdw@lylesfirm.com](mailto:jdw@lylesfirm.com)  
***Attorneys for Respondent***

Mt. Pleasant, South Carolina  
August 11, 2025



LYLES & ASSOCIATES, LLC  
ATTORNEYS AT LAW  
[www.lylesfirm.com](http://www.lylesfirm.com)

Robert T. Lyles, Jr.  
Member

Reply to: Main Office  
E-mail: [rtl@lylesfirm.com](mailto:rtl@lylesfirm.com)

August 11, 2025

**VIA E-MAIL & U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RECEIVED

AUG 13 2025

SC Court of Appeals

Re: *Deborah Denise Harley vs. D.R. Horton, et al.*  
Appellate Case No.: 2024-002137

Dear Ms. Kitchings:

Attached please find Respondent's Final Brief and Proof of Service regarding the above-referenced matter. Also, pursuant to the Court of Appeal's correspondence dated June 24, 2024, one bound copy and one unbound of Respondent's Final Brief have been forwarded via U.S. Mail.

Thank you, and with kindest regards, I am

Very truly yours,

LYLES & ASSOCIATES, LLC

Robert T. Lyles, Jr.

RTL/cw  
Enclosures

cc: Via E-Mail Only  
John T. Crawford Jr., Esquire  
Kimila L. Wooten, Esquire  
David L. Paavola, Esquire  
Kathryn L. Harden, Esquire  
W. Jacob Henerey, Esquire  
Amelia Farmer, Esquire

# PRIORITY MAIL

PRIORITY MAIL  
POSTAGE REQUIRED



PRESS FIRMLY TO SEAL

<b>P</b>	US POSTAGE & FEES PAID IMI <input type="checkbox"/> stamps.com	06350014950563
	1 LB PRIORITY MAIL RATE	8330469
	ZONE 2	FROM 29464
	Commercial	
		08/11/2025
<b>USPS PRIORITY MAIL</b> ®		
Robert T. Lyles, Jr. Lyles & Associates, LLC 1037 Chuck Dawley Blvd Mt Pleasant SC 29464-4146		0003
SHIP TO:	The Honorable Jenny Abbott Kitchings Clerk, SC Court of Appeals 1220 Senate St Columbia SC 29201-3769	
<b>USPS TRACKING #</b>		
9405 5111 0549 5865 7102 46		
CHS35595-Lyles		

RECEIVED

AUG 1 2025

SC Court of Appeals

PRESS FIRMLY TO SEAL

how2recycle.info

VISIT US AT USPS.COM®  
ORDER FREE SUPPLIES ONLINE

VISIT US AT USPS.COM®  
ORDER FREE SUPPLIES ONLINE

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® and Priority Mail International® shipments. Misuse may be a violation of federal law. This package is not for resale. EP14 © U.S. Postal Service, December 2024. All rights reserved.

DuPont™ Tyvek®  
Protect What's Inside.™