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**Aug 25 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM OCONNE COUNTY  
Court of Common Pleas  
R. Lawton McIntosh, Trial Court Judge

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Court of Common Pleas Case No. 2023-CP-37-00329  
Appellate Court Case No. 2025-000537

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Hugh T. Watson

Appellant,

v.

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

Respondents.

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**PROOF OF SERVICE**

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I certify that on this date, August 25, 2025, I filed the Appellant's Initial Brief and Designation of Matter with the South Carolina Court of Appeals via electronic filing and served a copy on Respondents via e-mail, addressed as listed below:

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August 25, 2025