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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2025-000537

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.

PROOF OF SERVICE

The undersigned, Stephanie H. Burton certifies that she is a member of Gibbes Burton, LLC and on the 24<sup>th</sup> day of September 2025, she served copies of the following:

1. Initial Brief of Respondent Ground Technology, Inc. d/b/a D'Appolonia Engineering Division of Ground Technology, Inc.; and
2. Designation of Matter to be Included in the Record on Appeal

by email, copies of the same addressed to:

Mr. K. Jay Anthony  
Anthony Law, LLC  
650 E. Washington Street  
Greenville, SC 29601  
[janthony@anthonylawsc.com](mailto:janthony@anthonylawsc.com)

*Attorneys for Appellant Hugh T. Watson*

Mr. Mason A. Goldsmith, Jr.  
Mr. Henry Drennan Quattlebaum  
Ms. Katherine Sieber Elmore  
Elmore Goldsmith Kelly & deHoll, PA  
P.O. Box 1887  
Greenville, SC 29602  
[agoldsmith@elmoregoldsmith.com](mailto:agoldsmith@elmoregoldsmith.com)  
[dquattlebaum@elmoregoldsmith.com](mailto:dquattlebaum@elmoregoldsmith.com)  
[kelmore@elmoregoldsmith.com](mailto:kelmore@elmoregoldsmith.com)

*Attorneys for Appellant Hugh T. Watson*

Mr. Kirby Darr Shealy, III  
Mr. W. Taylor Stanley  
Adams and Reese, LLP  
1221 Main Street, Suite 1200  
Columbia, SC 29201  
[kirby.shealy@arlaw.com](mailto:kirby.shealy@arlaw.com)  
[taylor.stanley@arlaw.com](mailto:taylor.stanley@arlaw.com)

*Attorneys for Hayward Baker, Inc.*

s/Stephanie H. Burton  
Stephanie H. Burton  
GIBBES BURTON, LLC  
308 East Saint John Street  
Spartanburg, SC 29302  
[sburton@gibbesburton.com](mailto:sburton@gibbesburton.com)  
Telephone: (864) 327-5000  
Facsimile: (864) 342-6884

*Attorneys for Respondent Ground Technology, Inc.  
d/b/a D'Appolonia Engineering Division of  
Ground Technology, Inc.*

Stephanie Burton  
sburton@gibbesburton.com



September 24, 2025  
*By Email*

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[Ctappfilings@sccourts.org](mailto:Ctappfilings@sccourts.org)

Re: Hugh T. Watson v. Hayward Baker, Inc., et al.  
Appellate Case No.: 2025-000537

Dear Ms. Kitchings:

We are enclosing for filing copies of the following:

1. Initial Brief of Respondent Ground Technology, Inc. d/b/a D'Appolonia Engineering Division of Ground Technology, Inc.;
2. Designation of Matter to be Included in the Record on Appeal; and
3. Proof of Service for same.

By copy of this letter, we are serving copies of the same by email on all counsel of record.

With kind regards,

Very truly yours,

GIBBES BURTON, LLC

A handwritten signature in blue ink that reads "Stephanie H. Burton". The signature is written in a cursive style with a long, sweeping underline.

Stephanie H. Burton

SHB/bre

Enclosures

cc: Mr. K. Jay Anthony (w/enclosures)(by electronic case filing)  
Mr. Mason A. Goldsmith, Jr. (w/enclosures)(by electronic case filing)

The Honorable Jenny Abbott Kitchings

September 24, 2025

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Ms. Katherine Sieber Elmore (w/enclosures)(by electronic case filing)  
Mr. Henry Drennan Quattlebaum (w/enclosures)(by electronic case filing)  
Mr. W. Taylor Stanley (w/enclosures)(by electronic case filing)  
Mr. Kirby Darr Shealy, III (w/enclosures)(by electronic case filing)