

RECEIVED

Sep 24 2025

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.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL OF
RESPONDENT GROUND TECHNOLOGY, INC. D/B/A D'APPOLONIA ENGINEERING
DIVISION OF GROUND TECHNOLOGY, INC.

Respondent Ground Technology, Inc. d/b/a D'Appolonia Engineering Division of Ground
Technology, Inc. proposes the following to be included in the Record on Appeal:

1. February 28, 1988 Deed.
2. May 26, 2015 Deed.
3. June 5, 2023 Amended Complaint.
4. April 15, 2024 Hugh Watson Deposition (20:3-7; 73:8-11; 82:22-25; 83:1-3; 84:15-17;
121:5-8)
5. April 16, 2025 L.G. "Skip" Lewis, Jr. Deposition (9:8-25; 10:1-5, 18-25; 130:8-13; 143:25;
144:1-3)

6. April 17, 2024 John Wolosick Deposition (20:1-25; 26:22-25; 27:1-13; 35:4-20; 86:4-9; 89:7-12; 102:3-9; 111:7-25; 114:21-23; 137:2-5; 209:13-16; 211:8-23; 213:17-23; 214:22-25; Ex. 34; Ex. 37; Ex. 38; Ex. 40; Ex. 41; Ex. 44; Ex. 48; Ex. 49; Ex. 51; Ex. 52; Ex. 54; Ex. 55; Ex. 57)
7. May 20, 2024 James Kahle Deposition (137:12-15; 139:14-22; 172:1-2, 17-20; 173:21-25; 174:1-3; 175:3-13; 180:8-14)
8. September 17, 2024 Robert Shusko Deposition (Ex. 73)
9. October 10, 2024 Stephanie B. Schmidt Deposition (14:20-24; 15:20-24; 16:25, 30:17-24, 31:1-18, 36:22-25, 37:1-3; 44:3-18; 60:22-25; 67:5-16).
10. October 22, 2024 Motion for Summary Judgment.
11. January 27, 2025 First Addendum of L.G. Lewis, Jr.
12. January 28, 2025 Motion to Strike.
13. February 14, 2025 Order.
14. March 13, 2025 Order.

I certify that this designation contains no matter which is irrelevant to this appeal.

September 24, 2025

s/Stephanie H. Burton
Stephanie H. Burton
GIBBES BURTON, LLC
308 East Saint John Street
Spartanburg, SC 29302
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.*