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Oct 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

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

MOTION FOR EXTENSION OF TIME

The Appellant respectfully requests that the South Carolina Court of Appeals grant an extension of time for Appellant to file their Reply Brief to Respondent's Ground Technology Inc., d/b/a D'Appolonia Engineering Initial Brief. Counsel for the Appellant is in the midst of litigating numerous other matters, including but not limited to, an Oral Arguments appearance in another matter. Appellant respectfully requests that the time to file the Reply Brief be extended an additional fifteen days making the Reply Brief due October 21, 2025.

All counsel of record have consented to this request.

/s/ K. Jay Anthony
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Counsel for Appellant

Greenville, South Carolina
October 3, 2025

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PROOF OF SERVICE

I certify that on this date, October 3, 2025, I filed the Appellant's Motion for Extension 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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Re: *Hugh Watson vs. Hayward Baker, Inc., et al*
2025-000537

Dear Sir or Madam:

Enclosed please find a copy of Appellant's Motion for Extension of Time to file their Reply Brief in the above matter. Also enclosed is the check for the filing fee and Proof of Service of the Same.

A copy of the Motion is also being sent electronically for your convenience.

Best Regards,

Julianna Wolfla
Paralegal to K. Jay Anthony

KJA:jw
Enclosure
cc: Counsel of Record – via email only