

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM AIKEN COUNTY

Court of Common Pleas
The Honorable Patrick C. Fant

Circuit Court Case No. 2023-CP-02-01719

Appellate Case No. 2024-002137

Deborah Denise Harley,

Respondent,

v.

D.R. Horton, Inc. and Plumbing
Solutions, LLC,

Defendants,

of Which D.R. Horton, Inc. is the

Appellant.

RECEIVED

Oct 13 2025

SC Court of Appeals

PROOF OF SERVICE

I certify that Appellant's Amended Final Brief has been served by email on all counsel of record as follows. A copy of the sent email is enclosed as **Exhibit 1** with this Proof of Service.

/s/ David L. Paavola

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

(864) 242-4899

(864) 242-4844

crawford@conlaw.com

wooten@conlaw.com

paavola@conlaw.com

henerey@conlaw.com

farmer@conlaw.com

Attorneys for Appellant

October 13, 2025

Other counsel of record:

LYLES & ASSOCIATES, LLC
Robert T. Lyles, Jr., Esq.
Joseph Daniel Winterstein, Esq.
1037 Chuck Dawley Blvd., Suite G-100
Mt. Pleasant, SC 29464
T 843-577-7730
F 843-577-7172
Email: rtl@lylesfirm.com
jdwl@lylesfirm.com

Counsel for Respondent Deborah Denise Harley

CLEMENT RIVERS, LLP
Catherine Holland Chase, Esq.
Willam A. Dennis, Jr. Esq.
PO Box 993
Charleston, SC 29402-0993
T 843-720-5488
Email: cchase@ycrlaw.com
bdennis@ycrlaw.com

Counsel for Plumbing Solutions, LLC

EXHIBIT 1



Deborah Denise Harley v. D.R. Horton, et al (Appellate Case No.: 2024-002137) Re Amended Final Brief

From Angelia Shaw <shaw@conlaw.com>

Date Mon 2025-10-13 10:51 AM

To rtl@lylesfirm.com <rtl@lylesfirm.com>; jdww@lylesfirm.com <jdww@lylesfirm.com>; cchase@ycrlaw.com <cchase@ycrlaw.com>; bdennis@ycrlaw.com <bdennis@ycrlaw.com>

Cc John Crawford <crawford@conlaw.com>; David Paavola <paavola@conlaw.com>; Jacob Henerey <henerey@conlaw.com>; Kim Wooten <wooten@conlaw.com>; Amelia Farmer <farmer@conlaw.com>

 5 attachments (3 MB)

25.10.13 Harley DRH Amended Final Brief_FINAL.pdf; Exhibit A (Vriens Order Granting MTCA).pdf; Exhibit B (Ban Order Granting MTCA).pdf; Exhibit C (Prest Order Granting MTCA).PDF; 25.10.13 Certificate of Counsel.pdf;

Counsel:

Attached please find Appellant's Amended Final Brief, Exhibits A-C, and Certificate of Counsel regarding *Deborah Denise Harley v. D.R. Horton, et al* (Appellate Case No.: 2024-002137) which will be filed momentarily with the Court.

Sincerely,



Angelia Shaw

Paralegal

KENISON, DUDLEY & CRAWFORD, LLC

440 Knox Abbott Drive, Suite 510

Cayce, SC 29033

Email: shaw@conlaw.com

Main: (864) 242-4899

Direct: (803) 233-1309

Website: www.conlaw.com

PLEASE NOTE OUR NEW COLUMBIA OFFICE MAILING ADDRESS, ABOVE.

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Kenison, Dudley & Crawford, LLC by replying to this email and delete the original and reply emails. Thank you.