

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

RECEIVED
Oct 24 2025
SC Court of Appeals

Case No. 2023-CP-37-00329
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.,

Respondent.

RESPONDENT KELLER NORTH AMERICA, INC.,
SUCCESSOR BY MERGER TO HAYWARD BAKER, INC.'S
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Respondent Keller North America, Inc., Successor by Merger to Hayward Baker, Inc., adopts and incorporates herein by reference Appellant's Designation of Matter to be Included in the Record on Appeal, as well as the 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.

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

Respectfully submitted,

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October 24, 2025.