

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

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Case No. 2023-CP-37-00329  
Appellate Case No. 2025-000537

**RECEIVED**

**Oct 24 2025**

**SC Court of Appeals**

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.

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PROOF OF SERVICE

I, Monica Gende, an employee of Adams and Reese, LLP, hereby certify that I have served a copy of **Respondent Keller North America, Inc., Successor by Merger to Hayward Baker, Inc.'s Initial Brief and Designation of Matter to Be Included in Record on Appeal** by emailing copies of the same via electronic mail only to counsel of record at the following e-mail addresses:

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October 24, 2025.