

**RECEIVED**

**Dec 18 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.

---

**PROOF OF SERVICE**

---

I certify that on this date, December 8, 2025, I filed the Record on Appeal with the South Carolina Court of Appeals via electronic filing and served a copy on Respondents via e-mail, addressed as listed below:

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Stephanie Burton, Esq.  
Gibbes Burton, LLC  
308 E. St. John Street  
Spartanburg, SC 29302  
[sburton@gibbesburton.com](mailto:sburton@gibbesburton.com)

Kirby Darr Shealy, III Esq  
Adams & Reese LLP  
1221 Main Street

Ste 1200  
Columbia, Sc 29201  
[Kirby.shealy@arlaw.com](mailto:Kirby.shealy@arlaw.com)

Mason A. Goldsmith, Jr  
Henry Drennan Quattlebaum  
Katherine Elmore  
Elmore Goldsmith Kelley & Deholl, PA  
[agoldsmith@elmoregoldsmith.com](mailto:agoldsmith@elmoregoldsmith.com)  
[dquattlebaum@elmoregoldsmith.com](mailto:dquattlebaum@elmoregoldsmith.com)  
[kemore@elmoregoldsmith.com](mailto:kemore@elmoregoldsmith.com)

Attorneys for Hugh Watson



K. Jay Anthony, Esq. (SC Bar No. 77433)  
Anthony Law, LLC  
650 E. Washington Street  
Greenville, South Carolina 29601  
864.301.8141 p  
864.203.8877 f

Attorney for Appellant

Greenville, South Carolina  
December 18, 2025