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**Dec 29 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

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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.

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**PROOF OF SERVICE**

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I certify that on this date, December 29, 2025, I filed the Appellant's Final Reply Brief 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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