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**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**APPEAL FROM GREENVILLE COUNTY  
Circuit Court**

**The Honorable R. Lawton McIntosh, Circuit Court Judge**

**RECEIVED**  
DEC 18 2018  
Court of Appeals

**Appellate Case No. 2018-001444**

Encore Technology Group, LLC.....Respondent/Appellant,

v.

Keone Trask and Clear Touch Interactive, Inc.  
f/k/a Clear Touch Interactive, LLC.....Appellants/Respondents

AND

Clear Touch Interactive, Inc. f/ka Clear Touch  
Interactive, LLC.....Appellants/Respondents

v.

Encore Technology Group, LLC.....Respondent/Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Appellants/Respondents, Keone Trask and Clear Touch Interactive, Inc. f/k/a Clear Touch Interactive, LLC, by and through their undersigned attorney, respectfully move this Court for an Order granting them ability to serve and file their initial brief outside the filing deadline set by Rule 208 of the South Carolina

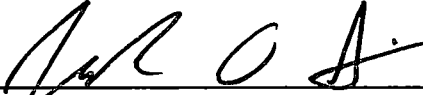
Appellate Court Rules, and in support of this motion, Appellants/Respondents state and respectfully show the following:

1. Appellants/Respondents received the trial transcript, the last transcript requested for this appeal, from the court reporter on November 24, 2018.
2. Due to the decision of this Court to consolidate three separate appeals, previously scheduled travel, the holidays, and the sheer volume and complexity of this matter, Appellants/Respondents respectfully request an extension for the filing of their Initial Briefs and Designation of Matter.
3. Appellants/Respondents have received consent from opposing counsel for Encore (Respondent/Appellant) for an additional thirty (30) days for the filings of Initial Briefs and Designation of Matters.
4. For these reasons, the Appellants/Respondents are requesting the time to file their Initial Brief and Designation of Matter be extended by thirty (30) days.

(signature page to follow)

Respectfully Submitted,

**ROE CASSIDY COATES & PRICE, P.A.**

  
\_\_\_\_\_  
Joseph O. Smith (S.C. Bar No. 77475)  
Joshua J. Hudson (S.C. Bar No. 100311)  
1052 N. Church St.  
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**Attorneys for Appellants/Respondents**

December 17, 2018  
Greenville, South Carolina

Other Counsel of Record:

Gregory J. English, Esq.  
Rita B. Barker, Esq.  
WYCHE, P.A.  
P.O. Box 728  
Greenville, SC 29602-0728  
*Attorneys for Encore Technology Group, LLC*

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AND

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v.

Encore Technology Group, LLC.....Respondent/Appellant.

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**PROOF OF SERVICE**


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I certify that I have served the Motion for Extension of Time to File Initial Brief on the above-named Respondent/Appellant by depositing a copy of it in the

United States Mail, postage prepaid, on December 17, 2018, addressed to counsel of record as follows.

Gregory J. English  
Rita Bolt Barker  
WYCHE, P.A.  
Post Office Box 728  
Greenville, SC, 29602  
**Attorneys for Respondent/Appellant**

**ROE CASSIDY COATES & PRICE, P.A.**



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**Attorneys for Appellants/Respondents**

December 17, 2018  
Greenville, South Carolina



Roe Cassidy  
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JOSEPH O. "JOSH" SMITH  
(864) 404-3140  
[JSMITH@ROECASSIDY.COM](mailto:JSMITH@ROECASSIDY.COM)

December 17, 2018

**VIA U.S. MAIL**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**  
DEC 18 2018  
SC Court of Appeals

**Re: *Encore Technology Group LLC v. Keone Trask and Clear Touch Interactive, Inc.,  
f/k/a Clear Touch Interactive, LLC***  
**Appellate Case No. 2018-001444**  
**RCCP 2626.0001A**

Dear Madam Clerk:

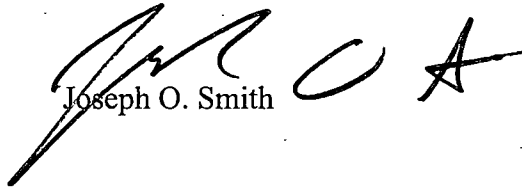
In support of our letter December 14, 2018, please find the original Motion for Extension of Time to File Initial Brief and six copies of same. I have also enclosed the Proof of Service on Respondents/Appellants and a \$50.00 check to cover the cost of the filing fee.

We appreciate the Court's time and consideration of this request. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

ROE CASSIDY COATES & PRICE PA

  
Joseph O. Smith

JOS/ads

cc: Gregory English, Esq.  
Rita Barker, Esq.

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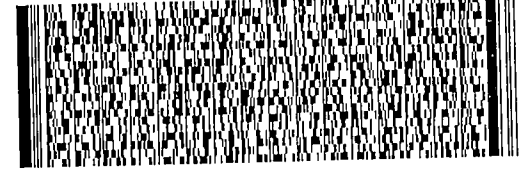
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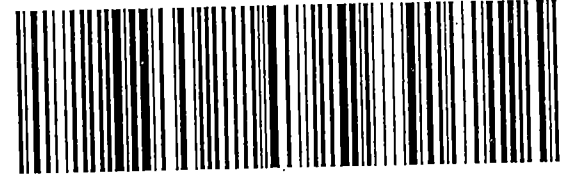


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