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

**APPEAL FROM GREENVILLE COUNTY
Circuit Court**

The Honorable R. Lawton McIntosh, Circuit Court Judge

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JAN 11 2019

SC 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 AND LENGTH OF 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 this Motion for Extension of Time

and Length of Initial Brief beyond the fifty (50) page limitation set by Rule 208 of the South Carolina Appellate Court Rules. Due to the length and complexity of the record in this matter, the important issues it presents, and the consolidation of three separate appeals, movants respectfully request a reasonable extension of time to file their Initial Brief and for an order allowing that Initial Brief to exceed fifty (50) pages in order to effectively brief this matter to facilitate the Court's review on appeal. 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 consolidation of three separate appeals, previously scheduled travel, other cases, and the sheer volume and complexity of this matter, Appellants/Respondents respectfully requested an additional extension for the filing of their Initial Briefs and Designation of Matter on or about December 17, 2018.
3. The Court granted Appellants/Respondents initial request; making the deadline for filing of its Initial Brief and Designation of Matters January 28, 2019.
4. Appellants/Respondents have been working diligently on preparing their Initial Brief and Designation of Matters. It has become apparent that more

time and space is necessary to adequately brief the various and complex issues before this Court arising out of a week-long trial, dismissal of a separate action, and the post-trial appointment of a Receiver.

5. For these reasons, the Appellants/Respondents are respectfully requesting the time to file their Initial Brief and Designation of Matter be extended by an additional thirty (30) days.
6. Appellants/Respondents further respectfully request a reasonable extension of the page limitations established by Rule 208(b)(5) of the South Carolina Appellate Court Rules. The Appellants/Respondents assert that a page extension is proper and necessary due to the lengthy trial record, complex underlying legal issues and facts upon which they are based, and the consolidation of the three appeals.

(signature page to follow)

Respectfully Submitted,

ROE CASSIDY COATES & PRICE, P.A.



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Attorneys for Appellants/Respondents

January 8, 2019

Greenville, South Carolina

Other Counsel of Record:

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Rita B. Barker, Esq.

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Attorneys for Encore Technology Group, LLC

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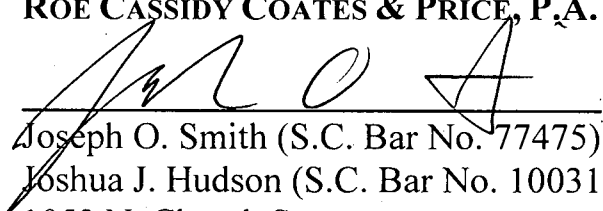
PROOF OF SERVICE

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

the United States Mail, postage prepaid, on January 8, 2019, addressed to counsel of record as follows.

Gregory J. English
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Greenville, SC, 29602
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January 8, 2019
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SC Court of Appeals

January 8, 2019

VIA U.S. MAIL

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

**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:

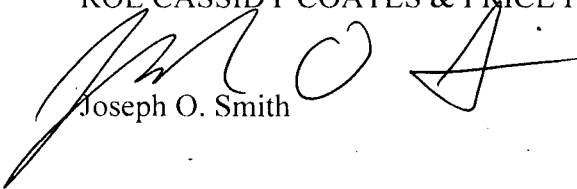
Enclosed please find the original Motion for Extension of Time and Length to File Initial Brief and six copies of same. I have also enclosed the Proof of Service on Respondents/Appellants and a \$50.00 check to cover the cost of the filing fee.

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.

V

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