

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

RECEIVED
SFP 25 2019
SC Court of Appeals

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.

**RESPONSE DESIGNATION OF MATTER FOR RECORD ON APPEAL
BY RESPONDENT/APPELLANT ENCORE TECHNOLOGY GROUP, LLC**

In connection with its Response Brief, Respondent/Appellant proposes that the following
be included in the Record on Appeal:

1. Final Order and Judgment;
2. Order Appointing Receiver;
3. Order filed Dec. 6, 2018;
4. Order Staying Receivership;
5. Complaint;
6. Trial Transcript:
pp. 72-75;
pp. 93-219;
p. 241;
pp. 245-269;
pp. 283-285;
pp. 288-370;
p. 373;

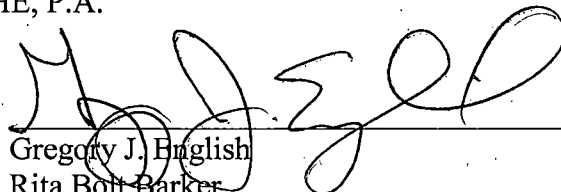
- pp. 388-400;
pp. 482-589;
pp. 619-621;
pp. 632;
pp. 651-652;
p. 769;
pp. 832-892;
pp. 1072-1073;
pp. 1085-1115;
p. 1175;
pp. 1186-1228;
7. Plaintiff's Exhibits 1, 2, 3, 4, 5, 6, 7, 8, 9, 10.B, 10.C, 10.D, 10.E, 10.G, 10.H, 10.I, 10.J, 11, 12, 13, 14, 15, 16, 18, 21, 22, 26, 27, 29, 31, 32, 33, 34, 35, 38, 39, 40, 41, 43, 44, 48, 51, 52, 53, 54, 56, 57, 58, 63, 68, 69, 70, 73, 76, 78, 79, 80, 82, and 83;
 8. Defendant's Exs. 17, 20, 29, 30, 31, and 33
 9. Kathy Cruse-Krebs' Video Deposition;
 10. Verdict Form
 11. Plaintiff's Motion for Judgment Including Restitution, Exemplary Damages, Attorneys' Fees, Expert Witness Fees, Costs and Other Expenses;
 12. Affidavit of Gregory J. English, Esq. filed Oct. 9, 2017;
 13. Reply Affidavit of Gregory J. English, Esq., filed Nov. 15, 2017;
 14. Defendants' Post Trial Motions dated October 9, 2017;
 15. Clerk's Email dated January 3, 2019;
 16. Defendants' Hearing Exhibit 4;
 17. Order Dismissing Case No. 2017-CP-23-05862;
 18. Clear Touch Amended Complaint in Case No. 2017-CP-23-05862;
 19. Encore Answer and Counterclaims in Case No. 2017-CP-23-05862;
 20. Clear Touch Motion for Summary Judgment in Case No. 2017-CP-23-05862;
 21. Encore Motion for Summary Judgment in Case No. 2017-CP-23-05862;
 22. Transcript of Record in Case No. 2017-CP-23-05862 - Summary Judgment Hearing held July 30, 2018, pp. 5-6, 8-9, 12, 17, 25, 45, 47-48.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

WYCHE, P.A.

BY:



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September 23, 2019

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PROOF OF SERVICE

I, Gregory J. English, of Wyche, P.A., attorneys for the Respondent/Appellant in the within action, do hereby certify that I have this date served upon opposing counsel the foregoing **RESPONSE DESIGNATION OF MATTER FOR RECORD ON APPEAL BY RESPONDENT/APPELLANT ENCORE TECHNOLOGY GROUP, LLC** by first class mail, addressed to the following:

Joseph Owen Smith
Joshua Jennings Hudson
Roe Cassidy Coates & Price PA
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Greenville, SC 29603



Gregory J. English

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Attorneys for Respondent/Appellant Encore Technology Group,
LLC

September 23, 2019

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Attorneys at Law

September 23, 2019

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BY FIRST CLASS MAIL

Hon. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

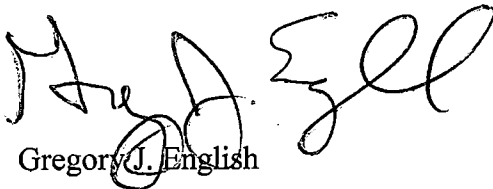
Re: *Encore Technology Group, LLC v. Keone Trask and Clear Touch Interactive, Inc.,
f/k/a Clear Touch Interactive, LLC*, Case No. 2018-001444

Dear Ms. Kitchings:

Enclosed please find an original and a copy of the Initial Response Brief and Response Designation of Matter for Record on Appeal by Respondent/Appellant, Encore Technology Group, LLC, in the above-captioned matter, along with the Proof of Service. Please return file-stamped copies of these documents to us in the self-addressed, stamped envelope provided.

Thank you for your assistance.

Best regards,


Gregory J. English

(864) 242-8247
genglish@wyche.com

Enclosures

cc: Joseph O. Smith, Esq. (by mail)
Joshua J. Hudson, Esq. (by mail)
Mr. Todd Newnam (by email)

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