

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**

OCT 02 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.

**APPELLANTS/RESPONDENTS' FIRST MOTION FOR EXTENSION  
OF TIME TO REPLY TO ENCORE TECHNOLOGY GROUP'S  
INITIAL RESPONSE BRIEF AND DESIGNATION OF MATTER**

Appellants/Respondents, Keone Trask and Clear Touch Interactive, Inc. f/k/a Clear Touch Interactive, LLC ("Clear Touch"), by and through their undersigned counsel, request a 21-day extension of time, through and including October 24, 2019, to submit its initial reply brief and designation of matter in response to the Initial Response and Response Designation of Matter of Respondent/Appellant Encore Technology Group, LLC ("Encore"), which is currently due on October 3, 2019.

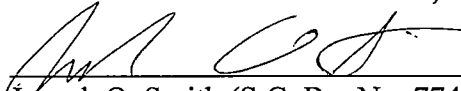
Given counsel for Clear Touch's schedule including other federal filing deadlines, mediation, and depositions in other cases, the three separate appellate filing deadlines in this and related appeals that all fall within the two-week span of September 23, 2019 and October 7, 2019, in addition to the complexity and volume of issues to be addressed, they do not have adequate time to prepare and file an Initial Reply Brief within the current deadline.

For these reasons stated herein, movants respectfully request a reasonable extension of time of twenty-one (21) days to file Appellants/Respondents' Initial Reply Brief. The undersigned certifies that he requested consent from counsel for Respondent/Appellant (Encore) to this extension but did not receive a response prior to mailing same.

**(Signature page to follow)**

Respectfully Submitted,

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



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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**

October 1, 2019  
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 Appellant Encore Technology Group, LLC*

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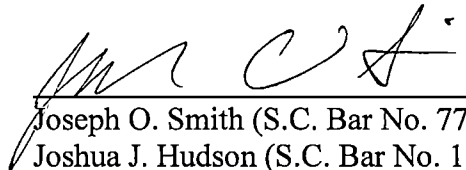
**PROOF OF SERVICE**

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I certify that I have served the First Motion for Extension of Time to File Initial Reply Brief and Designation of Matter on the above-named Respondent/Appellant by depositing a copy of it in the United States Mail, postage prepaid, on October 1, 2019, addressed to counsel of record as follows.

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

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

  
Joseph O. Smith (S.C. Bar No. 77475)  
Joshua J. Hudson (S.C. Bar No. 100311)  
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**Attorneys for Appellants/Respondents**

October 1, 2019  
Greenville, South Carolina



JOSEPH O. "JOSH" SMITH  
(864) 404-3140  
JSMITH@ROECASSIDY.COM

October 1, 2019

**VIA FED-EX**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**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 No. 2626.0001A**

Dear Madam Clerk:

Enclosed please find the original and six copies of Appellants/Respondents' First Motion for Extension of Time to File Initial Reply Brief and Designation of Matter in the above-referenced case. We are requesting a twenty-one (21) day extension which would make the deadline October 24, 2019.

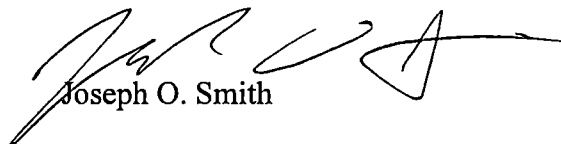
I have also enclosed the Proof of Service on Respondents/Appellants and a \$50.00 check to cover the cost of the filing fee. Please file both documents in your office and return the filed copy to me in the envelope provided herein. By copy of this letter, we are serving counsel for Respondent/Appellant with a copy of same.

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.

# FedEx

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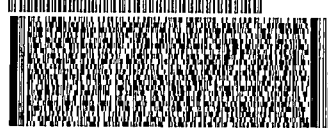
ORIGIN: LOKA (864) 249-2800  
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POE CASSIDY COATES & PRICE, PA  
1052 N. CHURCH STREET  
GREENVILLE, SC 29601  
UNITED STATES US

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(803) 734-1899 REF: 2526 0001A  
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SC Court of Appeals

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