

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Circuit Court

The Honorable R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2018-001444

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SC Court of Appeals

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.

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APPELLANTS/RESPONDENTS' SECOND 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 14-day extension of time, through and including November 7, 2019, to submit its initial reply brief 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 24, 2019.

Given counsel for Clear Touch's schedule including multiple depositions in other cases,

filing deadlines, and 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 fourteen (14) days to file Appellants/Respondents' Initial Reply Brief. The undersigned certifies that he requested and received consent from counsel for Respondent/Appellant (Encore) to this extension.

(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)
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Attorneys for Appellants/Respondents

October 15, 2019
Greenville, South Carolina

Other Counsel of Record:

Gregory J. English, Esq.
Rita B. Barker, Esq.
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Greenville, SC 29602-0728
Attorneys for Appellant Encore Technology Group, LLC



JOSEPH O. "JOSH" SMITH
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October 15, 2019

VIA FED-EX: 7767 2169 0896
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' Second Motion for Extension of Time to File Initial Reply Brief and Designation of Matter in the above-referenced case. We are requesting a fourteen (14) day extension which would make the deadline November 7, 2019.

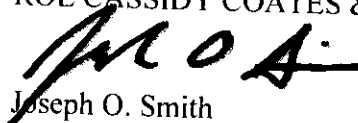
I have also enclosed the Proof of Service on Respondents/Appellants and a \$50.00 check to cover the cost of the filing fee. Please file both documents in your office and return the filed copy to me in the envelope provided herein. By copy of this letter, we are serving counsel for Respondent/Appellant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

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JOS/ads

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

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v.

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

PROOF OF SERVICE

I certify that I have served the Second 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 15, 2019, addressed to counsel of record as follows.

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Attorneys for Appellants/Respondents

October 15, 2019
Greenville, South Carolina

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GREENVILLE, SC 29601
UNITED STATES US

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TO **THE HON. JENNY ABBOTT KITCHINGS**
SC COURT OF APPEALS CLERK OF COURT
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890

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