

91183

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
CIRCUIT COURT

The Hon. R. Lawton McIntosh, Circuit Court

**RECEIVED**  
OCT 17 2019  
SC Court of Appeals

Appellate Case No. 2018-001444

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

v.

Keone Trask and Clear Touch Interactive, Inc..... Appellants/Respondents.

**ENCORE TECHNOLOGY GROUP, LLC'S FIRST MOTION FOR EXTENSION TO  
REPLY TO APPELLANT/RESPONDENTS' INITIAL BRIEF**

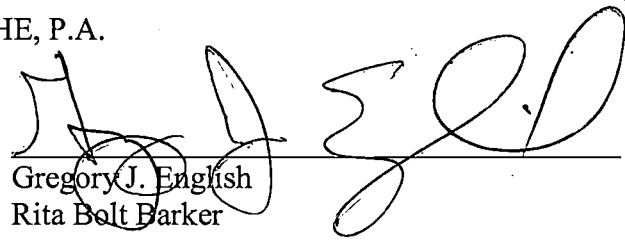
Respondent/Appellant Encore Technology Group, LLC ("Encore") requests a five-week extension of time, through and including November 21, 2019, to submit its brief in reply to the Appellants/Respondents' Initial Brief, which is currently due on October 17, 2019.

To address Encore's arguments on appeal, the Court granted Appellants/Respondents an extension to file their response brief. Appellants/Respondents served their Initial Brief in response on October 7, 2019, but it did not arrive until the afternoon of Friday, October 11, 2019, when Encore's counsel was out of town. Encore requests this extension because of previously scheduled vacation and work-related travel plans. The undersigned certifies that he consulted with counsel for Appellants/Respondents, who consent to this motion.

Respectfully submitted,

WYCHE, P.A.

BY:



Gregory J. English  
Rita Bolt Barker

200 East Camperdown Way  
Post Office Box 728  
Greenville, South Carolina 29602  
(864) 242-8200

Attorneys for Respondent/Appellant  
Encore Technology Group, LLC

October 15, 2019

Other Counsel of Record:

Joseph Owen Smith  
Joshua Jennings Hudson  
Roe Cassidy Coates & Price PA  
Post Office Box 10529  
Greenville, SC 29603

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
CIRCUIT COURT

The Hon. R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2018-001444

**RECEIVED**

OCT 17 2019

SC Court of Appeals

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

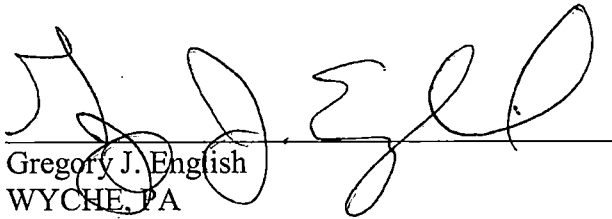
v.

Keone Trask and Clear Touch Interactive, Inc..... Appellants/Respondents.

**PROOF OF SERVICE**

I, Gregory J. English, of Wyche, P.A., attorneys for the Respondent/Appellant Encore Technology Group, LLC in the within action, do hereby certify that I have this date served upon opposing counsel the foregoing **ENCORE TECHNOLOGY GROUP, LLC'S FIRST MOTION FOR EXTENSION TO REPLY TO APPELLANT/RESPONDENTS' INITIAL BRIEF** by first class mail, addressed to the following:

Joseph Owen Smith  
Joshua Jennings Hudson  
Roe Cassidy Coates & Price PA  
Post Office Box 10529  
Greenville, SC 29603

A handwritten signature in black ink, appearing to read "Gregory J. English", is written over a horizontal line. The signature is stylized and cursive.

Gregory J. English  
WYCHE, PA  
200 East Camperdown Way  
Post Office Box 728  
Greenville, South Carolina 29602  
(864) 242-8200

Attorneys for Respondent/Appellant  
Encore Technology Group, LLC

October 15, 2019

**W Y C H E**

Attorneys at Law

October 15, 2019

BY FIRST CLASS MAIL

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

**RECEIVED**  
OCT 17 2019  
SC Court of Appeals

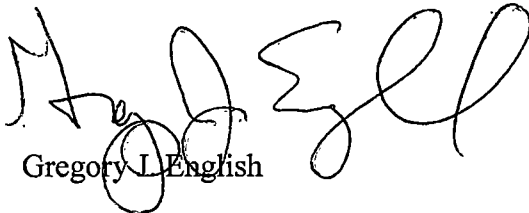
Re: Encore Technology Group, LLC vs. Keone Trask, et al.,  
Appellate Case No. 2018-001444

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Respondent/Appellant Encore Technology Group, LLC's First Motion for Extension to Reply to Appellant/Respondents' Initial Brief, along with the Proof of Service and filing fee for same. Please return a file-stamped copy 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

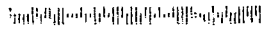
GJE/sc

Enclosures

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

**W Y C H E**  
PROFESSIONAL ASSOCIATION

PO Box 728, Greenville, SC 29602-0728  
p: 864.242.8200 | f: 864.235.8900  
www.wyche.com



NEOPOST  
10/15/2019  
US POSTAGE \$001.90  
ZIP 29601  
041510429510

W Y C H E

Attorneys at Law

RECEIVED

OCT 17 2019

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

SC Court of Appeals