

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Circuit Court

DEC 05 2019

The Honorable R. Lawton McIntosh, Circuit Court Judge

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' MOTION FOR  
EXTENSION OF TIME TO FILE THE RECORD ON APPEAL**

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 30-day extension of time, through and including January 6, 2020, to submit the Record on Appeal. In the course of preparing the Record on Appeal, Clear Touch realized that items referenced in the Designation of Matter did not accurately reflect the Second Amended Initial Brief of Appellants/Respondents filed on June 27, 2019. Rather, some items that were included in the Designation of Matter had been referenced in the originally filed Initial Brief of Clear Touch which

was 100 pages in length. Per the Court's Order dated May 24, 2019, Clear Touch was ordered to reduce the length to no more than 60 pages. The Designation of Matter was inadvertently filed with designations from that original filing erroneously incorporating content that was no longer referenced in the Initial Brief and missing designations from the Second Amended Initial Brief. Counsel requests leave to file an Amended Designation of Matter and an additional 30 days to file the Record on Appeal.

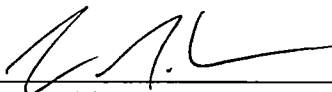
Due to the complexity of the issues and the sheer volume of this particular record, more time is required to compile and physically process the Record on Appeal.

For these reasons stated herein, movants respectfully request a reasonable extension of time of thirty (30) days to file Appellants/Respondents' Record on Appeal. 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.**



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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**

December 4, 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 Motion for Extension of Time to File the Record on Appeal on the above-named Respondent/Appellant by depositing a copy of it in the United States Mail, postage prepaid, on December 4, 2019, addressed to counsel of record as follows.

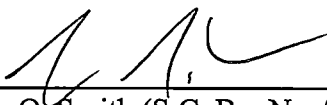
Gregory J. English, Esq.  
Rita Bolt Barker, Esq.  
WYCHE, P.A.  
Post Office Box 728  
Greenville, SC, 29602  
**Attorneys for Respondent/Appellant**

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**Attorneys for Appellants/Respondents**

December 4, 2019  
Greenville, South Carolina



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JHUDSON@ROECASSIDY.COM

December 4, 2019

**VIA FED-EX: 7771 5239 7538**

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

**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' Motion for Extension of Time to File the Record on Appeal in the above-referenced case. We are requesting a thirty (30) day extension which would make the deadline January 6, 2020. Also, we are requesting leave to file an Amended Designation of Matter.

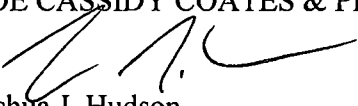
I have also enclosed the Proof of Service on Respondents/Appellants and a \$50.00 check to cover the cost of the filing fee. Please file both documents in your office and return the filed copy to me in the envelope provided herein. By copy of this letter, we are serving counsel for Respondent/Appellant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

  
Joshua J. Hudson

JJH/ads

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

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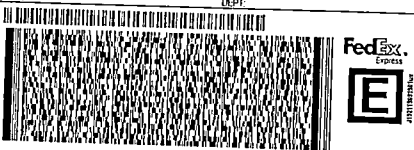
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GREENVILLE, SC 29501 BILL SENDER  
UNITED STATES US

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

COLUMBIA SC 29201  
(803) 734-1890 REF: 25260001A  
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