

**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
DEC 18 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' SECOND 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 an additional 30-day extension of time, through and including February 5, 2020, to submit the Record on Appeal.

Due to the complexity of the issues, the sheer volume of this particular record, and the holidays, more time is required to compile and physically process the Record on Appeal. Our third-party vendor informed us that it will take them five (5) full business days to prepare, print, and bind the Record on Appeal for submission to the Court. As with our office, over the next few

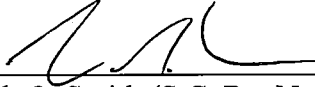
weeks, our third-party vendor's office will be closed for the holidays and have several people who have previously scheduled vacations, making it impossible to complete everything necessary by the current deadline.

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 consent from counsel for Respondent/Appellant (Encore) to this extension but did not receive confirmation of consent before the filing of this Motion.

(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)
1052 N. Church St.
Greenville, SC 29601
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Attorneys for Appellants/Respondents

December 17, 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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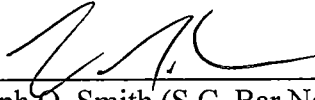
PROOF OF SERVICE

I certify that I have served the Second 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 17, 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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SC Court of Appeals

ROE CASSIDY COATES & PRICE, P.A.



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December 17, 2019
Greenville, South Carolina



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JHUDSON@ROECASSIDY.COM

December 17, 2019

VIA FED-EX: 7772 7368 0792
Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

**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 February 5, 2020.

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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ORIGIN D. LOKA (854) 349-2903
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ROE CASSIDY COATES & PRICE, PA
1652 N. CHURCH STREET

SHIP DATE: 17DEC19
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CAD: 7638452A/ET4160

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GREENVILLE, SC 29601
UNITED STATES US

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

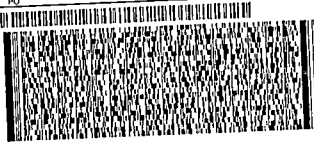
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(803) 734-1890

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DEC 18 2019

SC Court of Appeals

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