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Dec 11 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS

Appeal from Charleston County
Probate Court

David L. Michel, Associate Judge of Probate

Appellate Case No.: 2024-001074

In re: Veronique W. Pickett

Bayard Scott Pickett, Jr..... Appellant,

v.

Laura V. Jones, as Trustee of the Laura V. Jones Trust as Established by the Will of Veronique H.W. Pickett Dated March 31, 1999 and as Trustee of the Kathleen E. Anderson Trust as Established under the Will of Veronique H.W. Pickett Dated March 31, 1999..... Respondents,

AND

Kathleen Anderson aka Kathleen Elizabeth Anderson,
in her individual capacity,.....Party in Interest / Counterclaimant.

**APPELLANT BAYARD SCOTT PICKETT Jr.’s MOTION FOR
EXTENSION OF TIME TO FILE AND SERVE INITIAL REPLY BRIEF AND
SUPPLEMENTAL DESIGNATION OF MATTER**

Pursuant to the South Carolina Court of Appeals Rules, Appellant Bayard Scott Pickett, Jr., (“Appellant”), by and through his undersigned counsel, hereby moves the Court for an order granting Appellant a thirty (30) day extension of time, until January 12, 2025, in which to file and serve Appellant’s Initial Reply Brief and Supplemental Designation of Matter. Appellant would submit that this extension is necessary due to counsel’s current case load. The deadline has not previously been extended.

Appellant consulted with Respondents' counsel and Respondents' counsel has no objection to the motion.

FERRARA LAW FIRM, PLLC

/s/ Paul B. Ferrara, III
Paul B. Ferrara, III (SC Bar #70511)
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Attorney for Appellant

December 11, 2024

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31,1999..... Respondents,

AND

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in her individual capacity,.....Party in Interest / Counterclaimant.

PROOF OF SERVICE

I do hereby certify that on December 11, 2024, I have served all counsel in this action with
a copy of *Appellant’s Motion for Extension of Time to File and Serve Initial Reply Brief and
Supplemental Designation of Matter* via e-filing to the following email addresses:

ATTORNEY FOR RESPONDENT

Eric B. Laquiere, Esquire
Laquiere Legal Services, LLC
3674 Old Charleston Hwy.
Johns Island, SC 29455 by electronic
by electronic mail to: eric@laqlaw.com

ATTORNEY FOR KATHLEEN ANDERSON AKA KATHLEEN ELIZABETH ANDERSON

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SC Court of Appeals

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*Paul B. Ferrara, III**
*Janel K. Ferrara**

**(also Admitted in N.C.)*

December 11, 2024

SENT VIA US MAIL:

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

RE: Pickett v. Jones, et al.

Case No: 2024-001074

Our File No.: 23-522

Dear Ms. Kitchings:

Please find enclosed our firm's check in the amount of \$50.00 for the filing fee for the motion to extend the deadline to file Appellant's Initial Reply Brief and Supplemental Designation of Matter.

Respectfully,

FERRARA LAW FIRM, PLLC



Paul B. Ferrara III

Enclosures: as stated

cc: Ms. Beth Palmer, Esq.
Mr. Eric Laquiere, Esq.