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Feb 24 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Probate Court

David L. Michel, Associate Judge of Probate

Appellate Case No.: 2025-000194

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.

RESPONDENT KATHLEEN ANDERSON'S RETURN
TO MOTION TO CONSOLIDATE APPEALS

COMES NOW, Kathleen Anderson, by and through her undersigned counsel, Eric
Esquire, and hereby submits this Return in support of the Motion to Consolidate Appeals filed by
Appellant, Bayard Scott Pickett, Jr.

Respondent Kathleen Anderson agrees that consolidation of the pending appeals is appropriate
for reasons of judicial economy and efficiency. Given the overlapping factual and legal issues in
the pending appeals, consolidation will prevent duplicative proceedings and ensure a more
efficient adjudication of the estate-related disputes.

Pursuant to Rule 214, SCACR, consolidation of cases on appeal is permitted where it serves the interests of judicial economy and avoids unnecessary costs or delays. Specifically, Rule 214, SCACR, states that:

“When two or more appeals involve identical or similar questions, the appellate court may, on its own motion or upon motion of a party, order a joint briefing and oral argument, or may order the appeals consolidated for disposition.”

In this case, the pending appeals arise from the same estate, involve closely related legal and factual issues, and share common parties. Resolving these matters in a single proceeding will streamline the appellate process, reduce costs for all parties, and provide for a comprehensive resolution of the issues affecting the estate. Additionally, avoiding piecemeal litigation will help prevent inconsistent rulings and further delays in estate administration.

WHEREFORE, Respondent Kathleen Anderson respectfully requests that this Court grant Appellant’s Motion to Consolidate Appeals pursuant to Rule 214, SCACR, in the interest of judicial economy and the efficient resolution of the estate’s legal disputes.

Respectfully submitted this ____ day of February, 2025.

_____/s/ Eric Laquiere _____
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PROOF OF SERVICE

I hereby certify that on this 24 day of February, 2025, I have served a true and correct copy of the foregoing Respondent Kathleen Anderson's Return to Motion to Consolidate Appeals upon the following counsel via electronic mail:

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Signed this 24 day of February, 2025.

/s Eric B. Laquiere
Laquiere Legal Services, LLC