

RECEIVED

Feb 10 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 the Matter of:
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, Respondent.

MOTION TO CONSOLIDATE APPEALS

Appellant, by and through undersigned counsel, hereby moves this Honorable Court, pursuant to Rule 214 of the South Carolina Appellate Court Rules, to consolidate Appeal Nos. 2024-001074 and 2025-000194. In support of this motion, Appellant states as follows:

1. The appeals arise from related proceedings that involve common parties and similar legal issues.
2. The resolution of both appeals will require consideration of overlapping factual and legal questions.

3. Consolidation will promote judicial economy, reduce duplicative filings, and avoid unnecessary expenditure of judicial resources.
4. The Record on Appeal in this case does not need to be recreated where the Record on Appeal has already been created in Appeal No. 2024-001074.
5. No party will be prejudiced by the consolidation of these appeals.

WHEREFORE, Appellant respectfully requests that this Court issue an order consolidating Appeal Nos. 2024-001074 and 2025-000194 for all purposes, including briefing, argument, and disposition.

FERRARA LAW FIRM, PLLC

/s Paul B. Ferrara, III

Paul B. Ferrara, III (SC Bar #70511)

8887 Old University Blvd.

Charleston, SC 29406

P: (843) 569-5511

F: (843)569-5411

paul@ferraralawfirm.net

Attorney for the Appellant

February 10, 2025

RECEIVED

Feb 10 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 the Matter of:
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, Respondent.

PROOF OF SERVICE

I, the undersigned, hereby certify that I have served the Appellant's Motion to Consolidate upon counsel by, on February 10, 2025 addressed to their attorney of record, via email to:

Elizabeth J. Palmer, Esq.
151 Meeting Street.
Charleston, SC 29445
Email: ep@saxtonstump.com

Eric B. Laquiere, Esq.
3674 Old Charleston Hwy.
Johns Island, SC 29445
Email: eric@laqlaw.com

FERRARA LAW FIRM, PLLC

/s/ Paul B. Ferrara, III
Paul B. Ferrara, III (SC Bar #70511)
8887 Old University Blvd.
Charleston, SC 29406
P: (843) 569-5511
F: (843)569-5411
paul@ferraralawfirm.net
Attorney for the Appellant

February 10, 2025

FERRARA LAW FIRM, PLLC

8887 Old University Blvd., Ste. 200
NORTH CHARLESTON, SC 29406
T: (843) 569-5511 / F: (843) 569-5411

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

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

February 10, 2025

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: 2024-001074/2025-000194
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 regarding the motion to consolidate that was filed concerning case numbers 2024-001074 and 2025-000194.

Sincerely,

FERRARA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to be 'P. Ferrara III', with a long horizontal flourish extending to the right.

Paul B. Ferrara III

Enclosures: as stated