

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. 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.

**APPELLANT BAYARD SCOTT PICKETT, JR.’S
MOTION FOR EXTENSION OF TIME TO FILE AND
SERVE INTIAL BRIEF**

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 August 7, 2025, in which to file and serve Appellant’s Initial Brief. Appellant would submit that this extension is necessary due to counsel’s medical necessity. The deadline has previously been extended once and this additional delay is based upon the following:

1. The current deadline for filing the Initial Brief and Designation of Matter is **July 7, 2025**, pursuant to this Court's order dated **June 6, 2025**. This motion is being filed in advance of the current deadline.
2. Undersigned counsel is presently scheduled to undergo a **major mandatory non-elective surgery**, along with associated diagnostic testing and postoperative recovery, which will prevent timely completion of the appellate filings by the existing deadline.
3. The undersigned respectfully requests an additional thirty (30) days, or until **August 7, 2025**, to allow sufficient time to recover and complete the necessary filings.
4. This request is made in good faith and not for the purpose of delay. The extension is necessary to ensure that the Appellant's brief is properly and thoroughly prepared.
5. A **supporting affidavit containing confidential medical information will be submitted under seal within five (5) business days of this filing, or sooner** if required by the Court.
6. Opposing counsel has been informed of this request via email on July 6, 2025, and as of the filing of this motion, their position regarding this request remains unknown.

FERRARA LAW FIRM, PLLC

/s Paul B. Ferrara, III

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Attorney for Appellant

July 6, 2025

North Charleston, South Carolina