

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF COMMON PLEAS

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APPEAL FROM CHARLESTON COUNTY  
Probate Court

AUG 18 2025

SC Court of Appeals

David L. Michel, Associate Judge of Probate

105560

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  
EMERGENCY MOTION FOR EXTENSION OF TIME  
TO FILE AND SERVE INTIAL BRIEF AND  
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 emergency order granting Appellant a thirty (30) day extension of time, until September 8, 2025, in which to file and serve Appellant’s Initial Brief. Appellant would submit that this extension is necessary due to counsel’s hospitalization for colon resection surgery and complications suffered as a result of this surgery. Counsel is currently bedridden and taking heavy medication for pain management. As a result of the medication, counsel is unable to complete any legal work at this time. The doctors anticipate counsel will be able to continue his legal practice by the end of August, 2025.

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 No. 70511

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North Charleston, SC 29406

(843) 569-5511 / (843) 569-5411 Fax

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*Attorney for Appellant*

August 7, 2025

North Charleston, South Carolina

**Ferrara Law Firm, PLLC**

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North Charleston, SC 29406  
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Paul B. Ferrara, III\*  
Janel K. Ferrara\*

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

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August 7, 2025

**SENT VIA US MAIL**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

Re: Bayard Scott Pickett, Jr., v. Laura V. Jones (2)  
Appellate Case No.: 2025-000194  
Our File No.: 23-522

Dear Ms. Kitchings:

Please find attached an emergency motion for extension of time to file the Initial Brief of Appellant, along with a check for \$50.00 for the filing fee. Opposing counsel has advised they have no objection to the extension.

Sincerely,

**FERRARA LAW FIRM, PLLC**



Paul B. Ferrara, III

Enclosures

cc: Elizabeth Janelle Palmer, Esquire  
Eric B. Laquiere, Esquire

Paul B. Ferrara, III  
Ferrara Law Firm, PLLC  
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North Charleston, SC 29406

CHARLESTON SC 294

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Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
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