

# The Law Office of Tristan M. Shaffer

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March 22, 2016

Janet Johnson  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, SC 29211

**RECEIVED**

APR 06 2016

**S.C. SUPREME COURT**

RE: Shawn Madison v. State (Appellate Case 2015-001798)

Dear Ms. Johnson,

Please find the enclosed Unopposed Petition for Extension to File Petition for Writ of Certiorari in the above referenced case and Certificate of Service.

Thank you for your assistance with this matter.

Sincerely,



Tristan Shaffer

Cc: Julie Coleman

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Aiken County  
Craig Brown, Circuit Court Judge

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SHAWN MADISON,

PETITIONER,

V.

THE STATE,

RESPONDENT.

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Appellate Case No. 2015-001798

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**Certificate of Service**

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I certify that on this day, I have served a copy of the Notice of Appeal in the above captioned case on Respondent by depositing it in the United States mail with postage prepaid and addressed to the Attorney for Respondent as listed below.



Tristan M. Shaffer (SC Bar # 77565)  
225 Columbia Ave.  
Chapin, SC 29036  
Phone: (803) 575-0384  
tristan@shafferlawsc.com

April 4, 2016

Other Counsel of Record:  
Julia Coleman  
South Carolina Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211  
Attorney for Respondent

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STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

APR 06 2016

Appeal from Aiken County  
Craig Brown, Circuit Court Judge **S.C. SUPREME COURT**

SHAWN MADISON,

PETITIONER,

V.

THE STATE,

RESPONDENT.

Appellate Case No. 2015-001798

**UNOPPOSED PETITION FOR EXTENSION TO FILE  
PETITION FOR WRIT OF CERTIORARI**

The undersigned counsel would respectfully request a **30-day** extension in which to file the Petition for Writ of Certiorari in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following:

1. The Petition for Writ of Certiorari is due to be served and filed today.
2. No previous extensions have been requested.
3. Counsel has been working diligently to finish the Petition for Writ of Certiorari but has been unable to complete it.
4. Counsel has also been working on an extensive proposed order in the *Stanko v. State* capital PCR. Counsel was also preparing for a civil trial that was scheduled for this week.
5. This request is made in good faith, and not for purposes of delay.
6. Counsel has spoken with counsel for the State, Julia Coleman who does not oppose this request and has authorized Counsel to indicate this to the Court.

WHEREFORE, the undersigned counsel would respectfully request **30-day** extension in which to file the Petition for Writ of Certiorari in this case. Counsel requests

that the time limits for filing the Petition for Writ of Certiorari be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Tristan M. Shaffer (SC Bar # 77565)  
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Chapin, SC 29036  
Phone: (803) 575-0384  
tristan@shafferlawsc.com

April 4, 2016

I CONSENT:

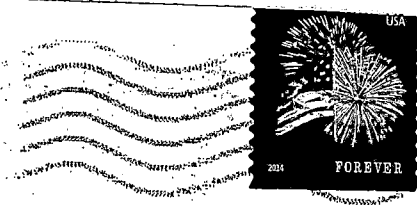


Julia Coleman

Law Office of Tristan M. Shaffer  
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COLUMBIA SC 292

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Janet Johnson  
South Carolina Supreme Court  
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