

# The Law Office of Tristan M. Shaffer

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June 28, 2016

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

**RECEIVED**

JUL 01 2016

**SC SUPREME COURT**

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

Dear Ms. Johnson,

Please find the Petition for Writ of Certiorari, Appendix, Supplemental Appendix, Petition to File Out of Time, and Certificate of Service in the above referenced case. Please file these documents.

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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JUL 01 2016

Appeal from Aiken County  
Craig Brown, Circuit Court Judge

SC SUPREME COURT

SHAWN MADISON,

PETITIONER,

V.

THE STATE,

RESPONDENT.

Appellate Case No. 2015-001798

**PETITION TO FILE PETITION FOR  
WRIT OF CERTIORARI OUT OF TIME**

The undersigned counsel would respectfully request to file the Petition for Writ of Certiorari in the above-referenced case out of time. In support of this motion, counsel would respectfully show the Court the following:

1. The Petition for Writ of Certiorari was due to be filed on Monday, June 20, 2016.
2. Counsel intended to mail the Petition for Writ of Certiorari on June 20, 2016 by mailing it pursuant to Rule 262(a)(2), SCACR.
3. Counsel has completed drafts of the Petition for Writ of Certiorari and Appendix on Saturday June 18, 2016 while on a family vacation out of state. Counsel however, realized that he needed to cite to a pre-trial hearing transcript that he did not have.
4. Counsel was able to obtain the pre-trial hearing transcript via e-mail from opposing counsel on Monday, June 20, 2016.
5. Counsel used the pre-trial hearing transcript to prepare a Supplemental Appendix, but was unable to have it bound in time to meet the June 20, 2016 mailing deadline.

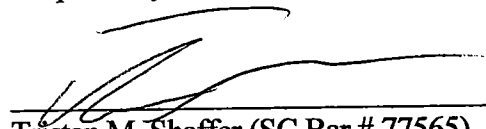
6. Counsel has attached the Petition for Writ of Certiorari, Appendix, and Supplemental Appendix to this motion.

7. This request is made in good faith, and not for purposes of delay.

8. Counsel has consulted with opposing counsel concerning this matter and she has indicated that she does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request to file the Petition for Writ of Certiorari in this case out of time.


Respectfully submitted,



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

June 28, 2016

I DO NOT OPPOSE:



*w/ permission  
to sign for:*  
Julia Coleman  
Counsel for Respondent

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Craig Brown, Circuit Court Judge

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Appellate Case 2015-001798

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Shawn Madison, #328499

Petitioner,

v.

State of South Carolina,

Respondent.

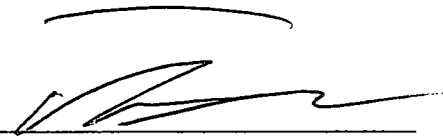
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CERTIFICATE OF SERVICE

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I certify that on this day a true copy of the petition for writ of certiorari, a copy of the appendix, supplemental appendix, and the petition to file out of time in this case have been served on Respondent by mailing a copy to the address below.

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Tristan M. Shaffer  
225 Columbia Ave.  
Chapin, South Carolina 29036  
(803) 941-7514  
Attorney for Petitioner

June 28, 2016

Attorney for Respondent:

Julia Coleman  
Assistant Attorney General  
South Carolina Attorney General's Office  
P.O. Box 11549  
Columbia, South Carolina 29211

Tristan M. Shaffer Attorney at Law  
225 Columbia Ave.  
Chapin, SC 29036

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

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COLUMBIA SC 29211

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