

FILE NO. _____

STATE OF MINNESOTA

IN SUPREME COURT

In Re Petition for Disciplinary
Action against SHANNON M. FITZPATRICK,
a Minnesota Attorney,
Registration No. 345349.

**STIPULATION FOR DISPENSING
WITH PANEL PROCEEDINGS,
FOR FILING PETITION FOR
DISCIPLINARY ACTION,
AND FOR DISCIPLINE**

THIS STIPULATION is entered into by and between Martin A. Cole, Director of the Office of Lawyers Professional Responsibility, hereinafter Director, and Shannon M. Fitzpatrick, attorney, hereinafter respondent.

WHEREAS, respondent has concluded it is in respondent's best interest to enter into this stipulation,

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned as follows:

1. It is understood that respondent has the right to have charges of unprofessional conduct heard by a Lawyers Professional Responsibility Board Panel prior to the filing of a petition for disciplinary action, as set forth in the Rules on Lawyers Professional Responsibility (RLPR). Pursuant to Rule 10(a), RLPR, the parties agree to dispense with Panel proceedings under Rule 9, RLPR, and respondent agrees to the immediate filing of a petition for disciplinary action, hereinafter petition, in the Minnesota Supreme Court.

2. Respondent understands that upon the filing of this stipulation and the petition, this matter will be of public record.

3. It is understood that respondent has certain rights pursuant to Rule 14, RLPR. Respondent waives these rights, which include the right to a hearing before a

referee on the petition; to have the referee make findings and conclusions and a recommended disposition; to contest such findings and conclusions; and to a hearing before the Supreme Court upon the record, briefs and arguments.

4. Respondent waives the right to answer and unconditionally admits the allegations of the petition.

5. Respondent and the Director further stipulate as follows:

a. Respondent states that the conduct as detailed within the petition was an isolated event rather than respondent's regular practice in client matters; respondent's client was aware respondent had affixed the client's cut-and-pasted signature to the document in question and approved the action; respondent asserts, and the Director does not dispute, that respondent cooperated with, and was forthright in her responses during, the disciplinary investigation; and respondent's conduct does not appear to have had any direct deleterious effect on the client's underlying legal matter as the client re-signed the document in person the following day before opposing counsel who properly notarized the client's signature and submitted the document to the presiding district court.

6. Respondent understands that based upon these admissions, this Court may impose any of the sanctions set forth in Rule 15(a)(1) - (9), RLPR, including making any disposition it deems appropriate. Respondent understands that by entering into this stipulation, the Director is not making any representations as to the sanction the Court will impose.

7. The Director and respondent join in recommending that:

a. The appropriate discipline is a 30-day suspension, pursuant to Rule 15, RLPR;

b. The reinstatement hearing provided for in Rule 18(a) through (d), RLPR, be waived;

- c. Respondent comply with Rule 26, RLPR (requiring notice of suspension to clients, opposing counsel, and tribunals);
- d. Respondent pay \$900 in costs and disbursements pursuant to Rule 24(a), RLPR;
- e. Respondent be required to successfully complete the professional responsibility portion of the state bar examination within one year of the date of this Court's order, pursuant to Rule 18(e)(3), RLPR;
- f. Respondent shall be eligible for reinstatement to the practice of law following the expiration of the suspension period provided that, not less than 15 days before the end of the suspension period, respondent files with the Clerk of Appellate Courts and serves upon the Director an affidavit establishing that she is current in continuing legal education requirements, has complied with Rules 24 and 26, RLPR, and has complied with any other conditions for reinstatement imposed by the court.
- g. Upon reinstatement to the practice of law, respondent be subject to two years' unsupervised probation subject to the following conditions:
 - i. Respondent shall cooperate fully with the Director's Office in its efforts to monitor compliance with this probation and promptly respond to the Director's correspondence by the due date. Respondent shall provide to the Director a current mailing address and shall immediately notify the Director of any change of address. Respondent shall cooperate with the Director's investigation of any allegations of unprofessional conduct which may come to the Director's attention. Upon the Director's request, respondent shall provide authorization for release of information and documentation to verify compliance with the terms of this probation.

ii. Respondent shall abide by the Minnesota Rules of Professional Conduct.

8. This stipulation is entered into by respondent freely and voluntarily, without any coercion, duress or representations by any person except as contained herein.

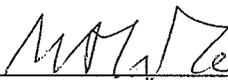
9. Respondent hereby acknowledges receipt of a copy of this stipulation.

10. Respondent hereby admits service of the petition.

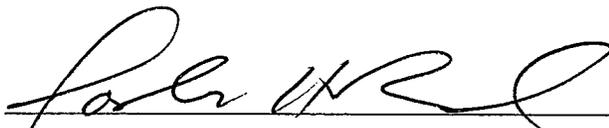
11. Respondent has been advised of the right to be represented herein by an attorney but has freely chosen to appear *pro se*.

IN WITNESS WHEREOF, the parties executed this stipulation on the dates indicated below.

Dated: December 19, 2014.


MARTIN A. COLE
DIRECTOR OF THE OFFICE OF LAWYERS
PROFESSIONAL RESPONSIBILITY
Attorney No. 148416
1500 Landmark Towers
345 St. Peter Street
St. Paul, MN 55102-1218
(651) 296-3952

Dated: December 19, 2014.


JOSHUA H. BRAND
ASSISTANT DIRECTOR
Attorney No. 388248

Dated: December 19, 2014.


SHANNON M. FITZPATRICK
RESPONDENT