

STATE OF SOUTH CAROLINA)
)
COUNTY OF BERKELEY)
)

IN THE COURT OF GENERAL SESSIONS
FOR THE NINTH JUDICIAL CIRCUIT
INDICTMENT NUMBER: 2016-GS-08-02603
WARRANT NUMBER: 2016A0810400692

STATE OF SOUTH CAROLINA,)
)
Plaintiff,)
)
-versus-)
)
MICHAEL COLUCCI,)
)
Defendant.)
_____)

**MOTION IN LIMINE
LUNSFORD**

MARY P. BROWN
CLERK OF COURT
BERKELEY COUNTY, S.C.

2018 NOV 20 PM 3:37

FILED

Michael Colucci, requests this Honorable Court to prohibit the State, witnesses of the State, or any other person from commenting upon the quality or standing of Mr. Colucci's attorney in accordance with the South Carolina Court of Appeals holding in *State v. Lunsford*, 318 S.C. 241, 456 S.E.2d 918 (SC App. 1995).

Mr. Colucci seeks an Order specifically prohibiting comments along the following lines:

1. The prominence, quality, notoriety, standing or reputation of Mr. Colucci's counsel;
and
2. The jurors need watch Mr. Colucci's counsel, because he is smart enough to make them believe something that is not so; and
3. That Mr. Colucci's counsel's objection to evidence is an attempt to conceal evidence from the jury; and
4. Mr. Colucci's counsel's ability to make witnesses appear to say things they do not mean.

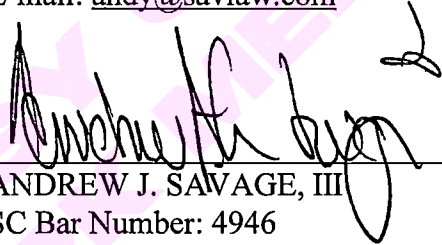
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Comments along these lines are not proper or relevant to the case at hand. Such comments would result in material prejudice to Mr. Colucci's right to obtain a fair and impartial trial, especially when the comments are not supported by the record of trial or the inferences drawn from it.

Respectfully submitted,

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BY: _____


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ATTORNEY FOR MICHAEL COLUCCI

Charleston, South Carolina

October 11/20, 2018.