

FILED

STATE OF SOUTH CAROLINA ) IN THE COURT OF GENERAL SESSIONS  
COUNTY OF BERKELEY ) FOR THE NINTH JUDICIAL CIRCUIT  
2018 NOV 20 PM 3:05 ) INDENTMENT NUMBER: 2016-GS-08-02603  
WARRANT NUMBER: 2016A0810400692

MARY P. BROWN  
CLERK OF COURT

STATE OF SOUTH CAROLINA )  
BERKELEY COUNTY, S.C. )

Plaintiff, )

-versus- )

MICHAEL COLUCCI, )

Defendant. )

**MOTION IN LIMINE TO PROHIBIT ANY  
REFERENCE TO THE TRUTHFULNESS OF  
A STATE'S WITNESS BY THE PROSECUTOR**

Michael Colucci requests that this Court prohibit the Prosecutor from advising the trial jury in any manner whatsoever that a witness is testifying truthfully or to suggest in any manner whatsoever that the truthfulness or accuracy of said witness has been or will be independently verified by the Prosecutor's Office. This Motion is based upon the following grounds:

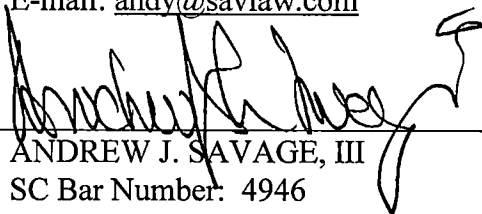
1. That such statements are improper and invade the province of the jury to determine the credibility of witnesses and constitutes an improper bolstering of said witness without benefit of confrontation for cross-examination as guaranteed by both the South Carolina and United States Constitutions.
2. That it is unethical under the Code of Professional Responsibility for an attorney to argue to a jury that he/she personally believes that a witness is telling the truth. Rule 3.4(e) of the South Carolina Rules of Professional Conduct, Rule 407 SCACR.

JHG

Respectfully submitted,

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BY: \_\_\_\_\_

  
ANDREW J. SAVAGE, III  
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Charleston, South Carolina

October 11/20, 2018.

COURTESY OF  
LUNA SHARK MEDIA