

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF BERKELEY )  
 )  
 STATE OF SOUTH CAROLINA, )  
 )  
 Plaintiff, )  
 )  
 -versus- )  
 )  
 MICHAEL COLUCCI, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

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

**MOTION TO DISCLOSE AND PRODUCE ANY  
 AND ALL RECORD OF COMMUNICATION**

FILED  
 2018 SEP 27 14:03  
 MARY P. ...  
 CLERK OF COURT  
 BERKELEY COUNTY

Michael Colucci asks this Court for an Order requiring the State to produce all statements of anticipated State witnesses in the possession of the prosecution which relate to the subject matter of the witness' testimony.

This motion is based upon Rule 5 (a)(2) of the SCRCrimP., which provides that the Court may require the production of any statement of any prospective witness prior to the time such witness testifies. This request contemplates any and all recorded statements taken by investigative agencies acting on behalf of the State or statements made available to the State from law enforcement agencies or other sources.

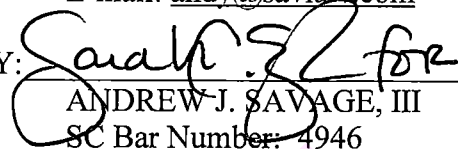
Due to the number of witnesses anticipated to be called and the technical nature of the evidence to be presented, this Order is needed to avoid delay of the proceedings and to ensure due process as guaranteed by Article I, Section 3 of the South Carolina Constitution. Mr. Colucci requests the production of these statements on or before October 1, 2018.

*Handwritten signature*

Respectfully submitted,

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BY:



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Charleston, South Carolina

~~October~~ 9/27, 2018.

COURTESY OF  
LUNA SHARK MEDIA