

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 TO LIMINE TO PREVENT THE  
STATE FROM REFERENCING OR  
ELICITING TESTIMONY OF MICHAEL  
COLUCCI'S TREATMENT OF HIS  
CHILDREN**

LEAH GUERRY DUBREUIL  
CLERK OF COURT  
SOUTH CAROLINA  
BERKELEY COUNTY, SC  
2016 APR 29 PM 12:05  
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Michael Colucci ("M. Colucci") seeks an Order of this Court to prevent the State from arguing or eliciting testimony concerning M. Colucci's treatment of his children, Milan and Bishop. How M. Colucci interacted with his children does not have any tendency to make the existence of any fact that is of consequence to the determination of Sara Colucci's death more probable or less probable than it would without the evidence. SCRE 401, 402.

Even if relevant, the probative value of referencing or alluding to any action and/or inaction of M. Colucci regarding the treatment of his children is substantially outweighed by the prejudicial effect it would have on a jury. SCRE 403.

ERB


Even if the probative value is outweighed by the prejudicial effect, the referencing or alluding to any action and/or inaction by M. Colucci regarding the treatment of his children is inadmissible character evidence. SCRE 404.

J. SCOTT BISCHOFF, II  
ADAMS & BISCHOFF, P.C.  
171 Church Street, Suite 360  
Charleston, SC 29401  
Telephone: (843) 277-0090  
E-mail: [scott@adamsbischoff.com](mailto:scott@adamsbischoff.com)

ANDREW J. SAVAGE, III  
SAVAGE LAW FIRM  
15 Prioleau Street  
Charleston, SC 29401  
Telephone: (843) 720-7470  
E-mail: [andy@savlaw.com](mailto:andy@savlaw.com)

ATTORNEYS FOR MICHAEL COLUCCI

BY:

  
\_\_\_\_\_  
ANDREW J. SAVAGE, III  
SC Bar Number: 4946

Charleston, South Carolina

April 29<sup>th</sup>, 2024