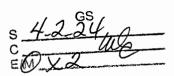
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| STATE OF SOUTH CAROLINA |) | IN THE COURT OF GENERAL SESSION FOR THE NINTH JUDICIAL CIRCUIT | IS |
|--------------------------|--------|--|-------|
| COUNTY OF BERKELEY |) | INDICTMENT NO.: 2016-GS-08-02603 WARRANT NO.: 2016A0810400692 | |
| STATE OF SOUTH CAROLINA, |) | Wildelight 110 2010/10010100092 | |
| Plaintiff, |)) | SIXTH SUPPLEMENTAL MOTION FOR THE PRODUCTION, INSPECTION AND ADDRESS OF THE PROPULATION | |
| -versus- |) | COPYING OF DOCUMENTS | 2024 |
| MICHAEL COLUCCI, |) | ELBO MEBO MOAH MOAH | APR |
| Defendant. |) | | -2 |
| | _) | | :6 HW |
| | | S E | .: |

MICHAEL COLUCCI (Colucci), respectfully requests an ORDER OF THE COURT:

To require that the Solicitor make available to the defense all information in the custody, possession, control or knowledge of the State, private parties acting as agents or employed on behalf of the State or its subdivisions, State Administrative Agencies, or any State or Federal Law Enforcement Agency or prosecutors involved in the investigation of the above-captioned matter, particularly that material and potential sources specifically identified, in accordance with the requirements of: the Due Process requirements of S.C. Const. Art. I, § 3, and U.S. Const. amends. V & XIV, Rule 5, SCRCrimP; Appellate Court Rule 407, Rules of Professional Conduct, Rule 3.8(d); Model Rule 3.8(d) of the American Bar Association's Standards for Criminal Justice; *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10 L.E.2nd 215 (1963); *Giglio v. United States*, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972), *United States v. Agurs*, 427 U.S. 97, 96 S.Ct. 2392, 49 L.Ed.2d 342 (1976); *United States v. Bagley*, 473 U.S. 667, 105 S.Ct. 3375, 87 L.Ed.2d 481 (1985); *Kyles v. Whitley*, 514 U.S. 419, 115 S.Ct. 1555, 131 L.Ed.2d 490 (1995); *Strickler v. Green*, 527



Oly

U.S. 263, 119 S.Ct. 1936, 144 L.Ed.2d 286 (1999); United States v. Acosta, D. Nev., No. CR-S-03-

0542 JCM (PAL), (2005); Gibson v. State, 334 S.C. 515, 514 S.E.2d 320 (1999); In the Matter of

Larry F. Grant, 343 S.C. 528, 541 S.E.2d 540 (2001); Leka v. Portuondo, 257 F.3d 89 (2001); State

v. Proctor, 348 S.C. 322, 559 S.E.2d 318 (2001), Riddle v. Ozmint, 369 S.C. 39, 631 S.E.2d 70

(2006), and their progeny.

Colucci filed Discovery Motions on May 12, 2016, April 2, 2018, August 2, 2018, August

15, 2018, September 19, 2018, and October 5, 2018 and served them on the Solicitor on or about

May 12, 2016, April 2, 2018, August 2, 2018, August 15, 2018, September 19, 2018 and October

5, 2018.

Colucci requests all documentation of the same or similar type or character previously

requested produced by any agency following his 2018 trial not yet provided. Also requested is the

inventory of the Toyota Prius, VIN Number JTDKN3DU7C1546138 located and photographed at

2206 North Main Street, Summerville, South Carolina, on May 20, 2015.

Respectfully submitted,

J. SCOTT BISCHOFF, II ADAMS & BISCHOFF, P.C.

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Charleston, SC 29401

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E-mail: scott@adamsbischoff.com

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BY:

NDREW J. SAVAGE, III

SC Bar Number: 4946

Charleston, South Carolina

March 27, 2024.

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Video Conferencing Address: 96.83.158.37

ANDREW J. SAVAGE, III Certified Criminal Trial Advocate - NBTA

V. JOSEPH CANNARELLA

March 27, 2024

The Honorable Leah Guerry Dupree Clerk of Court for Berkeley County 300-B California Avenue Moncks Corner, SC 29461

RE: State v. Michael Colucci

Dear Ms. Dupree:

Enclosed herein please find an original and two copies each of a Sixth Supplemental Motion for Discovery and Certificate of Service in the above-referenced matter.

Please file the originals and return the true copies to me in the enclosed self-addressed stamped envelope.

With best wishes, I remain

Sincerely,

Heather C. Hill

Paralegal to Andrew J. Savage, III

Heether C His

/hch

Enc: Sixth Supplemental Motion for the Production, Inspection and Copying of Documents;

original and two copies

Certificate of Service; original and two copies

Self-addressed stamped envelope

cc: Joel Kozak, Esquire, Assistant Attorney General (with enclosure)

J. Scott Bischoff, Esquire (with enclosure)

Mr. Michael Colucci (with enclosure)

FILED WE

| STATE OF SOUTH CAROLINA |) IN THE COURT OF GENERAL SESSIONS |
|--------------------------|---|
| |) FOR THE NINTH JUDICIAL CIRCUIT |
| COUNTY OF BERK能能學R-2 | A) 9: 2 INDICTMENT NO.: 2016-GS-08-02603 |
| LEAH GUERF | RY JUPREE WARRANT NUMBER: 2016A0810400692 |
| CLERA OF | COURT |
| STATE OF SOUTH CAROLINAS | COUNTY, SC |
| |) |
| Plaintiff, |) |
| |) |
| -versus- |) CERTIFICATE OF SERVICE |
| |) |
| MICHAEL COLUCCI, |) |
| | |
| Defendant. | |
| | |

The undersigned hereby certifies that a copy of a Sixth Supplemental Motion for the Production, Inspection and Copying of Documents has been served upon Assistant Attorney General Joel Kozak by mailing a copy properly addressed with sufficient postage affixed thereto this 27th day of March, 2024, at his current address listed below:

Joel Kozak, Esquire Assistant Attorney General SC Attorney General's Office Rembert C. Dennis Building Post Office Box 11549 Columbia, SC 29211-1549

SWORN TO and SUBSCRIBED BEFORE me

this 27th day of March, 2024.

Heather Way July (L.S.) NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 11/13/2024

s 4-2-24 c EMX2

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