

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 NO.: 2016-GS-08-02603
WARRANT NO.: 2016A0810400692

**EIGHTH SUPPLEMENTAL MOTION FOR
THE PRODUCTION, INSPECTION AND
COPYING OF DOCUMENTS**

2025 APR 10 PM 12:54
LEAH GIERE, CLERK OF COURT
BERKELEY COUNTY, SC

FILED 23

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

To require that the Assistant Attorney General 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.Ed.2d 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 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 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 a Discovery Motion on May 12, 2016, April 2, 2018, August 2, 2018, July 20, 2018, August 2, 2018, August 15, 2018, September 19, 2018, October 5, 2018, and April 2, 2024, and served on the Assistant Attorney General on or about May 12, 2016, April 2, 2018, August 2, 2018, July 20, 2018, August 2, 2018, August 15, 2018, September 19, 2018, October 5, 2018, April 2, 2024, and April 15, 2024.

Colucci reiterates his request for all information and documents previously requested in his previous Discovery Motion, not yet produced and further specifically requests the following:

Any and all reports or other documentation of tests run by the prosecution or anyone working for the prosecution regarding whether the necklace Sara Colucci was wearing at the time of her death could withstand certain pounds of pressure before breaking.

FURTHER, the Defendant will specifically move that said Order requiring production, inspection, copying and/or photographing specifically require compliance by the State within thirty (30) days. This production is specifically sought so that the information discoverable pursuant to the above-cited cases will be meaningful for the proper preparation of the defense of Michael Colucci.

Respectfully submitted,

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Charleston, South Carolina
April 10, 2025