

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 ADOPT ALL PREVIOUSLY
FILED DISCOVERY MOTIONS**

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

FILED
MC

Michael Colucci ("Colucci"), for the purpose of his re-trial, requests this Court to consider his previously filed Motions for Discovery and Disclosure:

1. Motion for Discovery filed May 12, 2016;
2. First Supplemental Discovery Motion filed April 2, 2018;
3. Motion to Restrict Discovery Not Produced in Advance of Trial filed July 20, 2018;
4. Second Supplemental Discovery Motion filed August 2, 2018;
5. Third Supplemental Discovery Motion August 15, 2018;
6. Fourth Supplemental Discovery Motion filed September 19, 2018;
7. Fifth Supplemental Discovery Motion filed October 5, 2018;
8. Motion for Meaningful Witness Disclosure filed February 3, 2023;
9. Motion to Disclose Witness History and Incentives filed February 6, 2023;
10. Motion to Sequester Witnesses filed February 6, 2023;
11. Motion to Limit Trial to Regular Court Hours filed February 6, 2023;
12. Motion for Access to Exhibits filed February 6, 2023;
13. Motion for Complete Recordation of All Proceedings filed February 6, 2023;
14. Motion to Compel Disclosure of Prosecutor's Jury Selection Data filed February 6, 2023;

15. Motion to Disclose and Produce Any and All Record of Communication filed February 6, 2023;
16. Motion to Suppress (Dyal Funeral Home) filed February 6, 2023;
17. Motion to Produce Chain of Custody Prior to Trial filed February 6, 2023;
18. Motion for Disclosure of State's Expert Witnesses filed February 8, 2023;
19. Motion for Disclosure of State Witnesses, Expert Summaries and Test Results filed February 8, 2023;
20. Sixth Supplemental Discovery Motion filed April 2, 2024;
21. Seventh Supplemental Discovery Motion filed April 15, 2024; and
22. Eights Supplemental Discovery Motion filed April 10, 2025.

Respectfully submitted,

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April 10, 2025