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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**

APR 10 PM 12:55
CLERK OF COURT, S.C.
BERKELEY COUNTY, S.C.

FILED
3M

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.

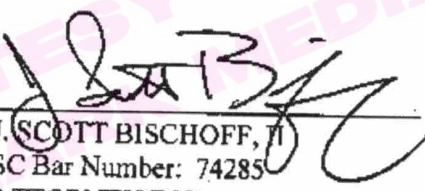
This motion is based upon Rule 5 (a)(2) of the SCRCrimP., which provides that the Court may require the production of any statement of any prospective witness prior to the time such witness testifies. This request contemplates any and all recorded statements taken by investigative agencies acting on 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 May 12, 2025.

Respectfully submitted,

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April 10, 2025

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