

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**

2016 APR 29 PM 12:08
LEAH GUERRY DUPRE
CLERK OF COURT
BERKELEY COUNTY, SC
ELB FILED

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.

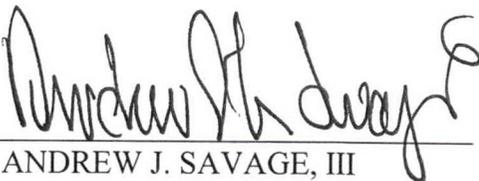
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Even if the probative value is outweighed by the prejudicial effect, the referencing or alluding to any action and/or inaction by M. Colucci regarding the treatment of his children is inadmissible character evidence. SCRE 404.

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ATTORNEYS FOR MICHAEL COLUCCI

BY: 
ANDREW J. SAVAGE, III
SC Bar Number: 4946

Charleston, South Carolina

April 29th, 2024

STATE OF SOUTH CAROLINA)
)
COUNTY OF BERKELEY)
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IN THE COURT OF GENERAL SESSIONS
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INDICTMENT NUMBER: 2016-GS-08-02603
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STATE OF SOUTH CAROLINA,)
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Plaintiff,)
)
-versus-)
)
MICHAEL COLUCCI,)
)
Defendant.)
)
_____)

**MOTION IN LIMINE TO PREVENT THE
STATE FROM REFERENCING OR
ELICITING TESTIMONY OF MICHAEL
COLUCCI'S CONDUCT IN RELATION TO
SARA COLUCCI'S BATHROOM HABITS
AT BARS**

2024 APR 29 11:29 AM
LEAH GUERRE
CLERK OF COURT
BERKELEY
FILED

Michael Colucci ("M. Colucci") seeks an Order from this Court to prevent the State from arguing or eliciting testimony concerning M. Colucci's conduct towards Sara Colucci ("S. Colucci") when she used the restroom.

During the 2018 trial, Robert O'Leary, a bar owner, testified that when M. Colucci was at the bar with S. Colucci, he would never let S. Colucci pee alone and/or go to the bathroom alone. Such conduct does not have any tendency to make the existence of any fact that is of consequence to the determination of S. 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 S. Colucci when she would use the restroom at a bar is substantially outweighed by the prejudicial effect it would on a jury. SCRE 403.

ELB

Even if the probative value is outweighed by the prejudicial effect, the referencing or alluding to any action and/or inaction of Mr. Colucci regarding the treatment of S. Colucci when she would use the restroom at a bar is inadmissible character evidence. SCRE 404.

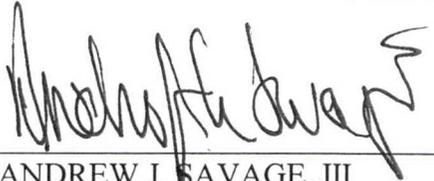
Respectfully submitted,

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Charleston, South Carolina

April 29th, 2024

STATE OF SOUTH CAROLINA)
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COUNTY OF BERKELEY)
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STATE OF SOUTH CAROLINA,)
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MICHAEL COLUCCI,)
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IN THE COURT OF GENERAL SESSIONS
FOR THE NINTH JUDICIAL CIRCUIT
INDICTMENT NUMBER: 2016-GS-08-02603
WARRANT NUMBER: 2016A0810400692

**MOTION TO LIMINE TO PROHIBIT THE
STATE FROM USING PREJUDICIAL TERMS**

FILED
APR 29 PM 12:06
CLERK OF COURT
BERKELEY COUNTY, SC

Michael Colucci (“M. Colucci”) seeks an Order of this Court to prohibit the Prosecutor and all State witnesses from using prejudicial terms such as those listed below:

1. “Victim” to describe Sara Colucci (“S. Colucci”);
2. “Defendant” to describe M. Colucci;
3. “Crime Scene” to describe the incident location of 2206 North Main Street in Summerville, South Carolina;
4. “Admission” or “Confession” to describe statements that may have been made by M. Colucci to law enforcement or third parties;
5. “Struggle” to describe alleged actions at the incident location;
6. “Medical Examiner” to describe a witness; and
7. “Homicide” to describe the death of S. Colucci.

Heretofore, the State of South Carolina, through its statutorily responsible agents¹, have complied with the authority they have been granted, and have designated the manner of S. Colucci’s

¹ S. C. Code §§ 17-5-9(a); 17-5-530(B); and 17-5-560

ELB

death as “undetermined.”² Accordingly, the use of the term “homicide” or similar terms would contradict the State’s previously determined declaration. The use of any term which implies a manner of death inconsistent with the previously published and unchanged finding of “undetermined” would be unfairly prejudicial to M. Colucci, and it would lead to confusion of the issues and be misleading to the jury, all in contravention of Rule 403, SCRE.

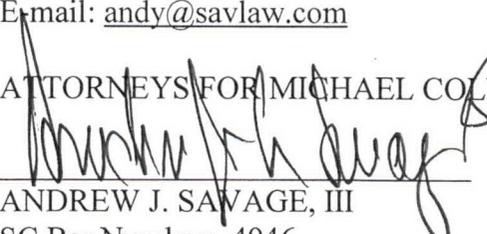
The terms “victim,” “defendant,” “crime scene,” “admission,” “confession,” “struggle,” “Medical Examiner,” and “homicide” are conclusory statements and considered an opinion or inference that embraces an ultimate issue to be decided by the trier of fact in this case. SCRE 704. Allowing the Prosecutor and all State witnesses to use these terms in reference to S. Colucci’s death is unfairly prejudicial to M. Colucci, and it would lead to confusion of the issues and be misleading to the jury, all in contravention of Rule 403, SCRE.

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ATTORNEYS FOR MICHAEL COLUCCI

BY:


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SC Bar Number: 4946

Charleston, South Carolina
April 26, 2024

² The original Death Certificate for S. Colucci dated June 23, 2015, lists the manner of death as “Pending Investigation.” The Amended Death Certificate dated January 13, 2016, lists the manner of death as “Could Not Be Determined.”

STATE OF SOUTH CAROLINA) IN THE COURT OF GENERAL SESSIONS
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STATE OF SOUTH CAROLINA,)
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 Plaintiff,)
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 -versus-)
)
 MICHAEL COLUCCI,)
)
 Defendant.)
 _____)

2024 APR 29 3PM 12
 LEAH GUENTHER
 CLERK OF COURT
 BERKELEY COUNTY
 ELB FILED

MOTION TO LIMINE TO PREVENT THE STATE FROM REFERENCING OR ELICITING TESTIMONY OR OFFERING EVIDENCE OF BLOOD TESTING BY THE BERKELEY COUNTY SHERIFF’S OFFICE

Michael Colucci (“M. Colucci”) seeks an Order of this Court to prevent the State from referencing, arguing for or against, eliciting testimony, or offering evidence concerning the red spot on Sara Colucci’s (“S. Colucci”) phone.

During the 2018 trial, Deputy Dean Kokinda of the Berkeley County Sheriff’s Office reference a red spot on S. Colucci’s phone and testified that, upon testing this spot, it was presumptively positive for human blood. The State has failed to provide information regarding the presumptive test that was used by Deputy Kokinda. This testing is scientific and requires expert testimony. The State must qualify Deputy Kokinda as an expert, and must provide M. Colucci with a report of his examination. The alleged presumptive test is of unknown reliability as M. Colucci has no information regarding the standards for the test used. A confirmatory test was never performed to rule out possible errors with presumptive testing. SCORE 701, 702. SCRCrimP 5(a)D.

ELB

The probative value of referencing, arguing for or against, eliciting testimony about, or offering evidence of the red spot on S. Colucci's phone, including the mentioning by any non-expert witness that it is human blood, is substantially outweighed by the prejudicial effect it would have on a jury. SCRE 403, 701, 702.

If the State is not prohibited from alluding to this red spot as being human blood, without further explanation and testing, it will prejudice the jury and allow them to erroneously infer that the red spot on S. Colucci's phone is blood from M. Colucci and/or S. Colucci.

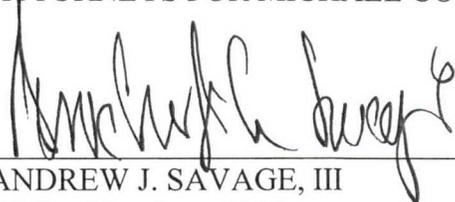
At a minimum, M. Colucci requests the Court provide an opportunity to Voir Dire any witness who anticipates expressing an opinion about the "red spot" observed on S. Colucci's phone.

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Charleston, South Carolina
April 26, 2024

STATE OF SOUTH CAROLINA)
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INDICTMENT NUMBER: 2016-GS-08-02603
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STATE OF SOUTH CAROLINA,)
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Plaintiff,)
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-versus-)
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MICHAEL COLUCCI,)
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Defendant.)
_____)

**MOTION TO LIMINE TO PREVENT THE
INTRODUCTION OF THE DEFENDANTS
FINANCIAL STATUS**

2024 APR 29 PM 05
LEAH GUERRY, CLERK
BERKELEY COUNTY, SOUTH CAROLINA
ERB FILED

Michael Colucci (“M. Colucci”) seeks an Order of this Court to prohibit the prosecutor (and all State witnesses) from referring in argument or eliciting testimony regarding M. Colucci’s financial status at or about the time of Sara Colucci’s death.

M. Colucci’s financial status at or about the time of Sara Colucci’s death does not have any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would without the evidence. SCRE 401, 402.

Even if relevant, the admission of such evidence has a prejudicial effect which substantially outweighs any probative value. SCRE 403.

Even if the probative value is outweighed by the prejudicial effect, evidence of financial status, including payment or non-payment of debts, pending property sales, or any other financial occurrences, is inadmissible evidence of Colucci’s character or trait of character. SCRE 404.

ERB

The State possesses no competent evidence that the alleged homicide of Sara Colucci was motivated by his financial status, nor is there any evidence that Sara Colucci's death provided any financial gain for M. Colucci. SCRE 404(b).

Respectfully submitted,

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ATTORNEYS FOR MICHAEL COLUCCI

BY:



ANDREW J. SAVAGE, III
SC Bar Number: 4946

Charleston, ~~So~~uth Carolina

April 26, 2024

STATE OF SOUTH CAROLINA)
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INDICTMENT NUMBER: 2016-GS-08-02603
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STATE OF SOUTH CAROLINA,)
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Defendant.)
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**MOTION IN LIMINE TO PREVENT THE
STATE FROM REFERENCING, ELICITING
TESTIMONY, OR OFFERING EVIDENCE
OF THE DAMAGED NECKLACE**

2024 APR 29 PM 12:50
EVAH GUERRY DUARTE
CLERK OF COURT
BERKELEY COUNTY

ElB
FILED

Michael Colucci (“M. Colucci”) seeks an Order from this Court to prevent the State from referencing, arguing for or against, eliciting testimony, or offering evidence of Sara Colucci’s (“S. Colucci”) necklace that was damaged during the 2018 trial of this case.

During the 2018 trial, the State’s theory was that M. Colucci strangled S. Colucci with the gold necklace that she wore around her neck. The State offered expert testimony in an effort to support this theory. During cross-examination of this expert, S. Colucci’s gold necklace was damaged.

Considering the State’s previous theory about the use of this necklace, the probative value of referencing, arguing for or against, eliciting testimony, or offering evidence of S. Colucci’s

ElB

damaged necklace is substantially outweighed by the prejudicial effect it would have on a jury.
SCRE 403.

M. Colucci does not object to the use of photographs of an undamaged necklace or offering
a replica of the damaged necklace.

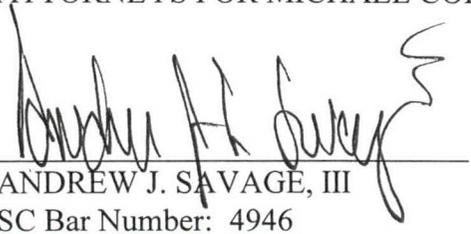
Respectfully submitted,

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ATTORNEYS FOR MICHAEL COLUCCI

BY:



ANDREW J. SAVAGE, III
SC Bar Number: 4946

Charleston, South Carolina

April 26th, 2024

STATE OF SOUTH CAROLINA)
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STATE OF SOUTH CAROLINA,)
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**MOTION IN LIMINE TO PREVENT THE
 STATE FROM REFERENCING, ELICITING
 TESTIMONY, OR OFFERING EVIDENCE
 OF HOW THE NECKLACE WAS DAMAGED**

2024 APR 23 PM 2:05
 LEAH O'BRYEN, CLERK
 BERKELEY, SOUTH CAROLINA
 EEB
 FILED

Michael Colucci (“M. Colucci”) seeks an Order from this Court to prevent the State from referencing, arguing for or against, eliciting testimony, or offering evidence of how Sara Colucci’s (“S. Colucci”) necklace that was damaged during the 2018 trial of this case.

During the 2018 trial, the State’s theory was that M. Colucci strangled S. Colucci with the gold necklace that she wore around her neck. The State offered expert testimony in an effort to support this theory. During cross-examination of this expert, S. Colucci’s gold necklace was damaged.

Considering the State’s previous theory about the use of this necklace, the probative value of referencing, arguing for or against, eliciting testimony, or offering evidence of how S. Colucci’s

EEB

necklace became damaged is substantially outweighed by the prejudicial effect it would have on a jury. SCRE 403.

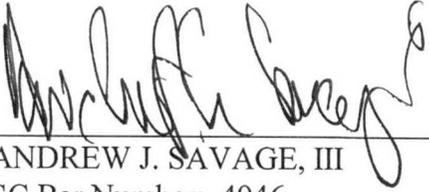
Respectfully submitted,

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ATTORNEYS FOR MICHAEL COLUCCI

BY:



ANDREW J. SAVAGE, III
SC Bar Number: 4946

Charleston, South Carolina

April 26th, 2024

STATE OF SOUTH CAROLINA)
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IN THE COURT OF GENERAL SESSIONS
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2024 APR 29 PM 12:05
 FILED
 ELB

**MOTION IN LIMINE TO EXCLUDE
 ARGUMENT OR TESTIMONY ABOUT
 DEFENDANT’S ALCOHOL OR DRUG USE**

Michael Colucci (“M. Colucci”) seeks an Order from this Court to prevent the State from arguing or eliciting testimony concerning M. Colucci’s history of alcohol use, use of prescription medication, or use of non-prescription drugs at all times not relevant to the health of Sara Colucci. If relevant, a temporal relationship is required. *State v. Glenn*, 328 S.C. 300, 492 S.E.2d 393, 397 (Ct. App. 1997); SCRE 401, 402.

M. Colucci does not object to the State’s introduction of evidence of his use of alcohol or other substance on May 20, 2015, if the proposed evidence is not otherwise prohibited by the South Carolina Rules of Evidence. Testimony concerning M. Colucci’s **history** of alcohol use, his use of prescription medication, or his use of non-prescription drugs before and after May 20, 2015, has no relevance unless such evidence can make the existence of any fact that is of consequence to the determination of the action more or less probable than it would without the evidence. SCRE 401, 402.

ELB

Even if relevant, the admission of such evidence has a prejudicial effect which substantially outweighs any probative value. SCRE 403.

Even if relevant and probative, such evidence of alcohol use, prescription medicine use, or use of non-prescribed drugs is evidence of M. Colucci's character or trait of character. SCRE 404(a).

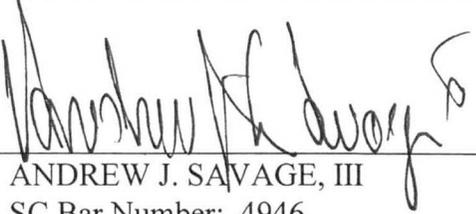
Respectfully submitted,

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April 26th, 2024

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**MOTION IN LIMINE TO PREVENT THE
STATE FROM REFERENCING OR ELICITING
TESTIMONY OF FUNERAL ARRANGEMENTS
FOR SARA COLUCCI OR DORIS COLUCCI**

2024 APR 29 PM 4:00
LEAH GUERRY
CLERK OF COURT
BERKELEY CO. S.C.
FILED
ELB

Michael Colucci (“M. Colucci”) seeks an Order from this Court to prohibit the State from referencing or alluding to arrangements for the funeral of either Sara Lynn Colucci (“S. Colucci”) or Doris Colucci.

The death of M. Colucci’s mother in April of 2017 or details of her funeral do not have any tendency to make the existence of any fact that is of consequence to the determination of M. Colucci’s charged misconduct on May 20, 2015, more probable or less probable than it would without the evidence. SCRE 401, 402, 403, 404.

The actions or inactions of M. Colucci regarding S. Colucci’s funeral is not relevant to this case. Funeral arrangements, or lack thereof, timing of such arrangements, parties involved in such arrangements, payment and/or invoices for the same, length of time the body remained at Dyal Funeral Home, whether the body was cremated or not, time of when the ashes were retrieved, and who retrieved the ashes, do not have any tendency to make the existence of any fact that is of consequence to the determination of S. Colucci’s death more probable or less probable than it would without the evidence. SCRE 401, 402.

ELB

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

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 funeral of either S. Colucci or Doris Colucci is inadmissible character evidence. SCRE 404.

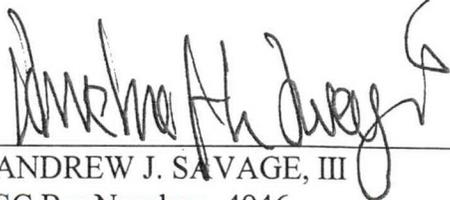
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_____)

CERTIFICATE OF SERVICE

2024 APR 29 PM 12:09
LEAH GUERRY JUDGE
CLERK OF COURT
BERKELEY COUNTY
ERB
FILED

The undersigned hereby certifies that a copy of the following motions have been served upon Assistant Attorney General Joel Kozak by mailing a copy properly addressed with sufficient postage affixed thereto this ²⁹~~26~~ day of April, 2024, at his current address listed below:
JCB

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

The motions include:

1. Motion in Limine to Exclude Argument or Testimony About Defendant’s Alcohol or Drug Use;
2. Motion in Limine to Prevent the State from Referencing or Eliciting Testimony of Michael Colucci’s Conduct in Relation to Sara Colucci’s Bathroom Habits at Bars;
3. Motion in Limine to Prevent the State from Referencing or Eliciting Testimony of Michael Colucci’s Treatment of His Children;
4. Motion in Limine to Prevent the State from Referencing, Eliciting Testimony, or Offering Evidence of the Damaged Necklace;

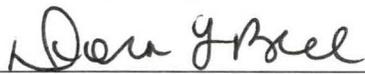
ERB

5. Motion in Limine to Prevent the State from Referencing, Eliciting Testimony, or Offering Evidence of How the Necklace Was Damaged;
6. Motion in Limine to Prevent the State from Referencing or Eliciting Testimony or Offering Evidence of Blood Testing by the Berkeley County Sheriff's Office;
7. Motion in Limine to Prohibit the State from Using Prejudicial Terms;
8. Motion in Limine to Prevent the Introduction of the Defendant's Financial Status; and
9. Motion in Limine to Prevent the State from Referencing or Eliciting Testimony of Funeral Arrangements for Sara Colucci or Doris Colucci.


CHERYLL SAVAGE

SWORN TO and SUBSCRIBED BEFORE me

this 26th day of April, 2024.

 (L.S.)
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 4/5/2031