

STATE OF SOUTH CAROLINA	)	IN THE COURT OF GENERAL SESSIONS
	)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	INDICTMENT NOS.:
	)	
STATE OF SOUTH CAROLINA,	)	
	)	
Plaintiff,	)	
	)	MOTION TO EXCLUDE USE OF
-versus-	)	PREJUDICIAL TERMS
	)	
JOHN DOE,	)	
	)	
Defendant.	)	
_____	)	

The Defendant, John Doe, by and through his undersigned counsel, Andrew J. Savage, III, moves this Honorable Court for an Order prohibiting the use of prejudicial terms in the course of jury selection and trial of the above-captioned indictments. Such prejudicial terms include the use of the word “victim” to describe the accusing parties. Specifically, the Defendant requests the following relief:

- That between now and the end of trial, when the Court is not referring to the accusing parties in this case by their proper names, that the Court refer to them as the “complaining witnesses.”
- That at trial, the Court order that all prosecuting attorneys and witnesses are precluded from referring to the accusers as “victims.”
- That at trial, the Court, the parties, and all witnesses refer to all persons, including both Doe and his accusers by their individual names.
- That no jury charges issued in this case refer to the accusers as “victims.”

Counsel submits a memorandum in support of its Motion to Exclude Prejudicial Terms, herein attached.

Respectfully submitted,

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February____, 2006.