

NOTICE OF MOTION TO COMPEL
FURTHER ANSWERS TO
INTERROGATORIES

Sample Only
Use At Your Own Risk



To _____ [name of responding party], _____ [responding party's attorney], attorney of record for _____ [responding party], and to _____ [names of other parties or attorneys appearing in action]:

PLEASE TAKE NOTICE that at _____ [time], on _____ [date], or as soon after as the matter can be heard, in _____ [Department _____ or as the case may be] of the _____ County Superior Court, _____ [court address], _____ [moving party] will move the court for an order requiring _____ [responding party] to provide further responses to interrogatories propounded by _____ [moving party]. This motion is made on the grounds that _____ [specify, for example: _____ (responding party) provided evasive, incomplete answers to Interrogatories 5-10, 15, 17, and 20-26]. The interrogatories at issue, _____ [responding party's] responses to them, and the reasons for compelling further response are set out in the attached Statement of Interrogatories and Responses in Dispute. Pursuant to sections 2030(l) and 2023(b)(1) of the Code of Civil Procedure, _____ [moving party] will also seek monetary sanctions of \$_____ against _____ [responding party and his or her attorney or as the case may be] for reasonable attorney fees and costs incurred in bringing this motion. Such sanctions are sought on the ground that there is not substantial justification for _____ [responding party's] conduct in _____ [conduct for which sanctions are sought, for instance: failing to provide complete answers to the interrogatories posed].

This motion will be based on the notice of motion, the attached memorandum of points and authorities, the declaration of _____ [name of witness or attorney or as the case may be], the Statement of Interrogatories and Responses in Dispute, the record and files of this case, and any further oral or documentary evidence introduced at the hearing of this motion.

Date: _____
_____ [Plaintiff's name]
Plaintiff *In Pro Per*

Gene Kinsey Kinsey Law Offices 1198 Pacific Coast Hwy., Suite 353 Seal Beach, CA 90740	Phone: (562) 596-8177 Email: KinseyE@ix.netcom.com Web: www.kinseylaw.com www.realpropertypartition.com
---	---