

KINSEY
LAW
OFFICES



SEAL BEACH, CA

NOTICE OF MOTION TO COMPEL FURTHER ANSWERS TO REQUESTS FOR ADMISSION

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 compelling _____ [responding party] to provide further responses to the _____ [number] Set of Requests for Admission propounded by _____ [moving party] to _____ [responding party] on _____ [date]. This motion is made on the grounds that _____ [specify, for example: _____ (responding party) provided evasive, incomplete answers to Requests 4, 10, 15, 17, and 30-35 in the _____ (number) Set of Requests]. The requests, responses at issue, and reasons for compelling further responses are set out in the attached Statement of Requests and Responses in Dispute. Pursuant to sections 2033(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 _____ [specify conduct for which sanctions are sought].

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 Requests 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

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