

DECLARATION FOR ADDITIONAL DISCOVERY

Sample Only
Use At Your Own Risk



I, _____ [declarant name], declare:

1. I am _____ [a party to this _____ (action or proceeding) appearing in propria persona or the attorney of record for _____ (name of party), a party to this _____ (action or proceeding)].

2. I am propounding the attached set of interrogatories, Set Number _____ [s, to _____ [responding party], the _____ [plaintiff or defendant] in the above cause of action.

3. Propounding Set _____ to _____ [responding party] will cause the total number of specially prepared interrogatories submitted to _____ [him or her] to exceed the number of specially prepared interrogatories permitted by section 2030(c)(1) of the Code of Civil Procedure.

4. To date, I have propounded to _____ [responding party] a total of _____ interrogatories _____ [if applicable, add the following: of which _____ were specially prepared interrogatories].

5. Set Number _____ contains a total of _____ specially prepared interrogatories.

6. I am familiar with the issues presented by this case, and the previous discovery conducted by all parties in the case.

7. I have personally examined each of the interrogatories in Set Number _____.

8. The additional number of specially prepared interrogatories in Set Number _____ is warranted under section 2030(c)(2) of the Code of Civil Procedure

_____ [state statutory factors relied on, and reasons why each factor relied on is applicable to instant lawsuit].

9. _____ [Propounding party] has not propounded the interrogatories contained in Set _____ for an improper purpose, such as to harass _____ [responding party], or _____ [his or her] attorney, or to cause unnecessary delay, or to cause a needless increase in the cost of litigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on at _____, California.

Date: _____

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

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