

## NOTICE OF MOTION TO COMPEL 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 serve a response to the \_\_\_\_\_ [number] Set of Interrogatories propounded by \_\_\_\_\_ [moving party] to \_\_\_\_\_ [responding party] and served on \_\_\_\_\_ [date]. This motion is made on the grounds that \_\_\_\_\_ [specify, for example: \_\_\_\_\_ (responding party) has failed to serve a response to \_\_\_\_\_ (moving party's) interrogatories, or to seek a protective order, within the (30 or as the case may be) days allotted by section 2030(h) of the Code of Civil Procedure. Copies of the \_\_\_\_\_ [number] Set of Interrogatories with proof of service are attached as Exhibit \_\_\_\_\_ and incorporated by reference]. Pursuant to sections 2030(k) 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.

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 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: <a href="mailto:KinseyE@ix.netcom.com">KinseyE@ix.netcom.com</a> Web: <a href="http://www.kinseylaw.com">www.kinseylaw.com</a> <a href="http://www.realpropertypartition.com">www.realpropertypartition.com</a>
---	---