

## NOTICE OF MOTION FOR PROTECTIVE ORDER

Sample Only  
Use At Your Own Risk



To \_\_\_\_\_ [name of deposing party], \_\_\_\_\_ [deposing party's attorney], attorney of record for \_\_\_\_\_ [deposing party], and to \_\_\_\_\_ [names of other parties or attorneys on whom copies of deposition notice or subpoena were served]:

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 a protective order \_\_\_\_\_ [specify type of protective orders sought, for instance: that plaintiff's deposition not be taken. In the alternative, \_\_\_\_\_ (moving party) seeks an order preventing \_\_\_\_\_ (deposing party) from inquiring into matters protected by the attorney-client privilege or the work product rule. Further, \_\_\_\_\_ (moving party) seeks an order that all or portions of the writings and tangible things designated for production in the deposition notice not be produced, inspected, or copied; or that only those items be produced that are not protected by the attorney-client privilege and the work product rule.] This motion is made on the grounds that \_\_\_\_\_ [specify, for example: \_\_\_\_\_ (deposing party) seeks disclosure at \_\_\_\_\_ (deponent's) deposition of information, including writings that reflect \_\_\_\_\_ (deponent's attorney's) impressions, conclusions, opinions, and legal research. Such information is protected by the attorney-client privilege and by the work product rule, and is thus not discoverable]. \_\_\_\_\_ [If sanctions are sought,

add the following: Pursuant to section 2023(b)(1) of the Code of Civil Procedure,  
\_\_\_\_\_ (moving party) will also seek monetary sanctions of \$\_\_ against  
\_\_\_\_\_ (noticing party and his or her attorney or as the case may be) for  
\_\_\_\_\_ (reasonable attorney fees and costs incurred in bringing this motion or as  
the case may be). Such sanctions are sought on the ground that there is not substantial  
justification for \_\_\_\_\_ (noticing party's) conduct in \_\_\_\_\_ (specify conduct  
for which sanctions are sought).]

The motion will be based on this 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*

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