

1 [COURT NAME: _____]

2 [COUNTY/DISTRICT: _____]

3 [STATE/JURISDICTION: _____]

4 [DIVISION/DEPARTMENT: _____]

5
6 **Case No.** _____

7
8
9
10 _____,

11 _____,

12
13 v.

14
15 _____,

16 _____.

17
18 **MOTION TO COMPEL COMPLIANCE**

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20
21
22 _____, _____, by and through
23 _____ undersigned counsel, hereby moves this Court for an order
24 compelling _____, _____, to comply with
25 _____ outstanding legal obligations. In support of this Motion,
26 Movant respectfully states as follows:
27
28

I. PROCEDURAL POSTURE AND BACKGROUND

1. This Motion is connected to the ongoing _____ proceeding currently pending before this Court.

2. On _____, Movant served or entered [describe the discovery request, subpoena, deposition notice, or court order, e.g., Plaintiff's First Request for Production of Documents].

3. The original deadline for compliance or response was _____.

4. The parties subsequently agreed to an extended compliance deadline of _____.

5. Despite the expiration of the extended deadline, _____ has failed to comply with _____ obligations. Specifically, the non-complying party has failed to [briefly describe the other obligation, e.g., produce responsive documents, answer deposition questions, or follow a prior court order].

II. SPECIFIC NON-COMPLIANCE AND DEFICIENCIES

6. The specific requests, topics, questions, or order provisions currently at issue and remaining unresolved are:

_____.

7. The non-complying party failed to meet their legal obligations by [describe how the opposing party or third party failed to comply, e.g., failing to produce any documents, serving incomplete answers, or failing to appear].

1
2 8. To the extent the non-complying party has asserted objections, those objections should be
3 overruled or limited because:

4 _____.

5
6 9. The requested responses, documents, testimony, or compliance are critical to the fair
7 resolution of this matter because:

8 _____.

9
10 10. The non-complying party's ongoing failure to perform has directly impacted the progress of
11 this litigation, specifically affecting the following case deadlines:

12 _____.

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14
15 **III. GOOD FAITH EFFORTS TO RESOLVE DISPUTE**

16
17 11. Pursuant to applicable rules, Movant has in good faith conferred, or attempted to confer,
18 with the non-complying party in an effort to obtain the information or compliance without court
19 action.

20
21 12. The parties' meet-and-confer efforts occurred on _____.

22
23 13. Despite these efforts, the parties were unable to reach a resolution. A summary of the meet-
24 and-confer efforts and their outcome is as follows:

25 _____.

1 **IV. LEGAL AUTHORITY AND REQUEST FOR SANCTIONS**

2
3 14. This Motion is supported by _____.

4
5 15. Due to the non-complying party's unreasonable failure to comply, Movant has incurred
6 significant and unnecessary attorney's fees, costs, and expenses in preparing this Motion and
7 attempting to secure compliance.

8
9 16. Movant requests an award of attorney's fees, costs, and expenses in the amount of
10 \$_____, or in an amount to be proven by affirmation, based on the
11 following:

12 _____.

13
14 17. Movant further requests that the Court impose the following additional sanctions or
15 remedies as permitted by law:

16 _____.

17
18 **V. RELIEF REQUESTED**

19
20 WHEREFORE, Movant respectfully requests that this Court enter an order:

21
22 a. Granting this Motion to Compel Compliance;

23
24 b. Ordering _____ to fully comply with
25 _____ outstanding obligations, specifically to
26 _____, within _____ days of the date of the
27 Court's order;

1
2 c. Awarding Movant _____ reasonable attorney's fees, costs, and
3 expenses incurred in connection with this dispute;
4

5 d. Imposing any further sanctions or remedies deemed appropriate by this Court; and
6

7 e. Granting such other and further relief as the Court deems just and proper.
8

9 **Dated:** _____
10

11 Respectfully submitted,
12

13 **Signature:** _____

14 **Printed Name:** _____

15 **Bar No.:** _____

16 **Firm:** _____

17 **Address:** _____

18 **Phone:** _____

19 **Email:** _____

20 *Attorney for Movant*
21

22 *(If self-represented)*

23 **Signature:** _____

24 **Printed Name:** _____

25 **Address:** _____

26 **Phone:** _____

27 **Email:** _____
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1 *Movant Pro Se*

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