

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
FAMILY COURT – DOMESTIC RELATIONS BRANCH**

NAME,

Plaintiff,

v.

NAME,

Defendant.

CASE NO.: _____

JUDGE

Next Court Date:

* * * * *

**MOTION TO COMPEL DISCOVERY,
AND FOR SANCTIONS AND ATTORNEY'S FEES**

COMES NOW the PLAINTIFF, NAME, by and through his Counsel of Record, Angela D. Minor, Esq., and the Law Offices of MINOR & WILLCOX, LLC and moves this Honorable Court to Compel the DEFENDANT, NAME to answer and produce documents responsive to Discovery requests in support thereof, states the following:

1. That the parties are before this Honorable Court on the matter of Child Custody, Visitation and Child Support.
2. That on DATE, the parties were before the Court for a Status Hearing and as a result of the parties' Discovery was at issue and therefore it was extended by this Honorable Court for two weeks for the Defendant, NAME, to provide Discovery responses to Plaintiff's Counsel no later than, DATE.
3. That DATE, has past and it is September 6, and Counsel for the Plaintiff has not received responses, production or a request for an extension from Defendant's Counsel.
4. That Discovery in the form of Interrogatories and Request for Production of Documents were served in this case on the Plaintiff on or about DATE, via first-class mail, to:

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**Sharon D. Nelson, Bruce A. Olson, John
W. Simek**



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Michigan Court Rules Kelly Stephen Searl, William C. Searl, 1922 *The Sedona Principles* Jonathan M. Redgrave, 2007

Model Rules of Professional Conduct American Bar Association. House of Delegates, Center for Professional Responsibility (American Bar Association), 2007 The Model Rules of Professional Conduct provides an up to date resource for information on legal ethics Federal state and local courts in all jurisdictions look to the Rules for guidance in solving lawyer malpractice cases disciplinary actions disqualification issues sanctions questions and much more In this volume black letter Rules of Professional Conduct are followed by numbered Comments that explain each Rule s purpose and provide suggestions for its practical application The Rules will help you identify proper conduct in a variety of given situations review those instances where discretionary action is possible and define the nature of the relationship between you and your clients colleagues and the courts **Family Law and Practice** Arnold H. Rutkin, 1985 *Maryland Civil Procedure Forms* Robert Dale Klein, *Federal Practice and Procedure* Charles Alan Wright, Arthur Raphael Miller, Mary Kay Kane, 1998 Gradually replacing 2nd ed published 1982 **Representing Yourself in Federal Court** United States District Court, Northern District of California, 2017-08-04 This Handbook is designed to help people dealing with civil lawsuits in federal court without legal representation Proceeding without a lawyer is called proceeding pro se¹ a Latin phrase meaning for oneself or sometimes in propria persona meaning in his or her own person Representing yourself in a lawsuit can be complicated time consuming and costly Failing to follow court procedures can mean losing your case For these reasons you are urged to work with a lawyer if possible Chapter 2 gives suggestions on finding a lawyer Do not rely entirely on this Handbook This Handbook provides a summary of civil lawsuit procedures but it may not cover all procedures that may apply in your case It also does not teach you about the laws that will control your case Make sure you read the applicable federal and local court rules and do your own research at a law library or online to understand your case The United States District Court for the Northern District of California has Clerk s Offices in the San Francisco San Jose and Oakland courthouses Clerk s Office staff can answer general questions but they cannot give you any legal advice For example they cannot help you decide what to do in your lawsuit tell you what the law means or even advise you when documents are due There are Legal Help Centers in the San Francisco Oakland and San Jose courthouses where you can get free help with your lawsuit from an attorney who can help you prepare documents and give limited legal advice This attorney will not be your lawyer and you will still be representing yourself See Chapter 2 for more details *Successfully Defending Your Credit Card Lawsuit* Richard A. Klass, 2013-10-14 If you are faced with a credit card lawsuit *Successfully Defending Your Credit Card Lawsuit* may help you present a more robust defense This book offers sample pleadings and motions numerous free forms and instructions and descriptions of the defenses and procedures in the typical case *Law of Federal Courts* Charles Alan Wright, Mary Kay Kane, 2002 *Moore's Federal Practice* , 1998 *Prenuptial Agreements Line by Line* Kirk C. Stange, 2014-04-01 Written by

an experienced attorney who frequently speaks on various family law topics Prenuptial Agreements Line by Line is a comprehensive examination of the crucial components included in a sample prenuptial agreement for the family law practitioner general practice attorney paralegal mediator or law student This book explains the reasoning behind different clauses in a prenuptial agreement including those that address the division of marital and separate assets consideration spousal support attorneys fees and costs alternative dispute resolution and confidentiality to help meet the specific needs of each client The sample agreement contained in this book outlines a variety of options and alternatives in drafting a prenuptial agreement including some ways spousal support can be addressed how property and debt division might be tackled as well as potential confidentiality issues and potential agreements on alternative dispute resolution While this agreement is not designed to include every possible provision it acts as a useful starting point for the drafting of an enforceable contract Prenuptial Agreements Line by Line is a valuable resource for anyone who has ever helped draft or negotiate a prenuptial agreement

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E-discovery: Creating and Managing an Enterprisewide Program Karen A. Schuler, 2011-04-18 One of the hottest topics in computer forensics today electronic discovery e discovery is the process by which parties involved in litigation respond to requests to produce electronically stored information ESI According to the 2007 Socha Gelbmann Electronic Discovery Survey it is now a 2 billion industry a 60% increase from 2004 projected to double by 2009 The core reason for the explosion of e discovery is sheer volume evidence is digital and 75% of modern day lawsuits entail e discovery A recent survey reports that U S companies face an average of 305 pending lawsuits internationally For large U S companies 1 billion or more in revenue that number has soared to 556 on average with an average of 50 new disputes emerging each year for nearly half of them To properly manage the role of digital information in an investigative or legal setting an enterprise whether it is a Fortune 500 company a small accounting firm or a vast government agency must develop an effective electronic discovery program Since the amendments to the Federal Rules of Civil Procedure which took effect in December 2006 it is even more vital that the lifecycle of electronically stored information be understood and properly managed to avoid risks and costly mistakes This book holds the keys to success for systems administrators information security and other IT department personnel who are charged with aiding the e discovery process Comprehensive resource for corporate

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