

Declaration Supporting Motion for Order Limiting Scope of Discovery

[Title of Court and Cause]

I, _____, declare:

I am the attorney for _____, party in the above-entitled action.

This declaration is in support of _____, *[party's]* motion for an order limiting the scope of discovery in the above-entitled matter as follows: _____ *[set forth discovery that has been requested, and facts supporting conclusion that burden, expense, or intrusiveness outweighs likelihood that information sought will lead to discovery of admissible evidence.]*

The following attempts have been made to resolve this matter: _____ *[describe attempts at informal resolution of each issue raised above.]*

The requested discovery itself constitutes an abuse of the discovery process, and _____ *[opposing party's]* insistence on the above-described requested discovery constitutes a further abuse of the discovery process for the following reasons: _____ *[set forth facts showing why the information sought will not lead to the discovery of admissible evidence.]*

_____ *[Set forth facts, such as attorney hours spent preparing and presenting motion, in support of amount of costs, expenses, and attorney's fees requested as monetary sanction.]*

Executed _____, _____, at _____, California.

I declare under penalty of perjury that the foregoing is true and correct.

[Signature]