

Notice of Motion for Order Limiting Scope of Discovery

[Title of Court and Cause]

To all parties and to their attorneys of record:

You will please take notice that on _____ the _____ day of _____, _____, at _____ o'clock _____ .m., or as soon thereafter as the matter may be heard, in _____ [the Law and Motion Department *or* Department _____] of the above-entitled Court, at the courthouse at _____ [address], _____ [moving party] will move the court for an order limiting the scope of discovery as follows: _____ [briefly set out the discovery requested and the limitations sought], and imposing costs, expenses, and attorney's fees as follows: _____ [set forth amount and person against whom monetary sanction is sought]. This motion will be made pursuant to CCP § _____ on the ground that the _____ [burden *or* expense *or* intrusiveness] of discovery that has been requested clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence, and on the further ground that the requested discovery constitutes an abuse of the discovery process, as set forth in the attached supporting declaration of _____.

The request for sanctions will be made on the ground that _____ [party *or* party's attorney] has made reasonable and good faith attempts to resolve the issues raised by this motion, and that these attempts have failed because of the unjustified refusal of _____ [opposing party *or* opposing party's attorney] to agree to the requested limitations on discovery, as set forth more fully in the attached supporting declaration of _____.

This motion is based on this notice, the pleadings, records, and papers on file herein, the attached memorandum of points and authorities, the attached declaration of _____, served and filed herewith, and on such other oral or documentary evidence as may be presented at the time of the hearing.

Dated: _____.

[Signature]