

_____ and _____ : _____ JUDICIAL DISTRICT COURT

: PARISH OF _____, LOUISIANA

: DOCKET NO. _____

**MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND
PLAINTIFF=S REQUEST FOR PRODUCTION**

Now comes _____ and _____, through undersigned counsel, and respectfully shows the Court that _____ and _____ mailed interrogatories and plaintiff=s request for production to _____, attorney for _____, on _____, 20____, that the delay for objecting or answering has passed, and that no response has been filed to the said interrogatories and request for production, and that the movers are entitled, as a matter of law, to an order compelling an answer to the interrogatories and production of documents propounded herein and to all reasonable attorney's fees and costs for bringing this Motion.

WHEREFORE, mover prays that an order issue commanding _____ to answer the interrogatories and produce the documents herein, within a time to be fixed by this honorable Court, and, in default thereof, that mover be granted judgment herein, by default; and mover further prays that the Court fix and tax _____ defendant-in-rule, reasonable attorney's fees and costs for bringing this Motion.

Attorney for Plaintiff

_____, LA _____
(____)_____
Bar Roll No. _____

_____ and : _____ JUDICIAL DISTRICT COURT

: PARISH OF _____, LOUISIANA

: DOCKET NO. _____

ORDER

Considering the foregoing Motion,

IT IS ORDERED THAT Defendant, _____, show cause on the _____ day of _____, 20____, at _____ o'clock ____m., why judgment should not be rendered in favor of Mover, by default, on account of failure to make discovery, or why the Court should not enter an order that the interrogatories be answered and documents be produced within a time specified by the Court, under penalty of default; and further why Mover should not have judgment for reasonable attorney's fees and for all costs and expenses for bringing this Motion.

_____, Louisiana this _____ day of _____, 20____.

DISTRICT JUDGE

Sheriff, please serve:

Defendant-in-rule
Through its attorney of record

Attorney at Law

_____, LA _____

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been forward
by U.S. Mail to _____, Attorney for Defendant, _____, LA _____,
postage prepaid and properly addressed.

_____, Louisiana this _____ day of _____, 20_____.

