

IN THE _____ COURT OF

COUNTY
STATE OF MISSISSIPPI

(Name of Plaintiff) **PLAINTIFF**

VS. **CAUSE NO.** _____

(Name of Defendant) **DEFENDANT**

Motion of Defendant for a Discovery Conference

Comes now _____ (*Name of Defendant*), Defendant, in the above-captioned cause, by and through his attorney, and moves this Court to hold a discovery conference pursuant to Rule 26-c of the Mississippi Rules of Civil Procedure on the grounds that Defendant's counsel has conferred with Plaintiff's counsel and has been unable to agree on the matters hereinafter set forth:

1.

The issues to be tried in this matter are as follows: (*set forth Defendant's version*)

_____.

2.

A reasonable plan and schedule of discovery is as follows: (*set forth Defendant's preference*) _____

_____.

3.

The following limitations should be placed on discovery: *(set forth Defendant's preference)* _____

_____.

4.

Other proposed orders with respect to discovery are the following: *(set forth Defendant's preference)* _____

_____.

Wherefore, Defendant respectfully moves the Court to order that a discovery conference be held on or before _____ *(date)*, and that after such conference, the Court enter an Order fixing the issues to be tried; establishing a plan and schedule of discovery; setting limitations upon discovery, if any; and determining such other matters, including the allocation of expenses, as are necessary for the proper management of discovery in the case.

Respectfully submitted,

(Name of Defendant)

By: _____
(Typed Name of Attorney)

(Signature of Attorney for Defendant)

Certificate of Service

This is to certify that I,

(Name of Attorney),
attorney for Defendant _____

(Name of Defendant), have this date served a true and correct copy of the above and foregoing **Motion** by U.S. Mail, postage fully prepaid, to the following counsel of record for Plaintiff:

(Name of Attorney for Plaintiff)
Post Office Box _____

(City, State, Zip Code)

This the ____ day of _____,
20____.

Respectfully Submitted,

(Printed Name)

(Attorney's Signature)

State Bar No. _____
Attorney for Defendant

OF COUNSEL:

(Name of Attorney)
Post Office Box _____ - _____

City, State, Zip Code
Telephone: _____ - _____ - _____

Notice of Motion to Reconsider Order

You are notified that on _____ *(date)*,
at _____ *(time)*, or as soon thereafter as counsel can be heard, in Courtroom
_____ of the _____ Court for _____
County, Mississippi, at the _____ *(County)* Courthouse
at _____
_____ *(street address, city, county, state, zip code)*, Defendant
_____ *(Name of Defendant)*,
by and through his attorney, will bring on for hearing his **Motion** for the reasons stated in the
above Motion.

Respectfully Submitted,

(Printed Name of Attorney)

(Signature of Attorney)

State Bar No. _____
Attorney for Defendant

OF COUNSEL:

(Name of Attorney)

Post Office Box _____ - _____

City, State, Zip Code

Telephone: _____ - _____ - _____