

3. Both causes of action arose as a result of an automobile accident which occurred on or about the ____ day of _____, 20____, at the intersection of _____ Drive and _____ Drive. The witnesses and much of the discovery in both cases, if not identical, should be similar. Consolidating these two actions presenting a common issue of law and fact would result in trial convenience and judicial economy. Consolidating these actions would also avoid a multiplicity of suits, prevent delay, help clear the Court's congested docket and save numerous costs and expenses.

WHEREFORE, for the reasons outlined above, the Defendants move that the above-entitled actions be ordered consolidated for trial purposes and all related discovery thereto.

RESPECTFULLY SUBMITTED this the ____ day of _____, 20____.

BY: _____
Their Attorney

NOTICE OF MOTION

TO: _____

TAKE NOTICE that the Defendants' Motion to Consolidate will be brought on for hearing before a _____ County Circuit Court Judge at the _____ County Courthouse in _____, _____, as soon as counsel may be heard.

OF COUNSEL

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed, by United States mail, postage prepaid, a true and correct copy of the above and foregoing Defendants' Motion to Consolidate and Notice of Motion to _____ at the following address:_____.

This the ____ day of _____, 20____.
