	_ COURT OF 2 OF	COUNTY
	) )	
Petitioner/Plair	) ntiff,	
Vs.	) NO	
Respondent/Defen	) dant ) )	

## DEFENDANTS' MOTION TO CONSOLIDATE AND NOTICE OF MOTION

COME N	NOW the	Defendants,		,	and
,	through coun	sel, and move th	e Court, pursua	ant to Rule	of the
R. Civ. P., to enter	an Order con	solidating for tria	al the above ref	erenced cause o	f action, being
Civil Action No.	, and _		VS	, Civ	il Action No.
, and for gro	ounds would sl	now as follows, to	o-wit:		
1. Thes	se two causes	of action whic	h are pending	before the Cir	cuit Court of
County	,	_, involve a com	non question o	f law or fact, and	l consolidation
of these two causes	of action will	avoid the expens	e, delay and inc	convenience of se	eparate trials.
2. Spec	cifically, in	Civil Action	No	,	and
	are Plaintiffs	and Counter-I	Defendants. I	n Civil Action	No,
	and	, along	with	, are D	efendants. In
addition,	, the	Plaintiff in Civ	vil Action No.	, is the	driver of the
Defendant's truck in	n Civil Action	No			

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 aboveentitled 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**

ТО: \_\_\_\_\_

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\_\_\_\_.