**COMMONWEALTH OF KENTUCKY**

**COUNTY CIRCUIT COURT**

**DIVISION II**

**CIVIL ACTION NO.: 99-CI-99999**

***Electronically Filed***

PLAINTIFF 1 PLAINTIFF

vs.

DEFENDANT 1 DEFENDANT

**MOTION TO COMPEL**

Comes the Plaintiff, Plaintiff 1, by and through Counsel and pursuant to CR 37.01, and hereby moves this Court to compel the Defendant, Defendant 1, to respond to the Post-Judgment Interrogatories and Request for Production of Documents, served by Plaintiff’s counsel on Month Day, Year, in the above-styled action. Defendant 1 has failed to provide responses to the Post-Judgment Interrogatories and Request for Documents within the requisite time frame.

Petitioner hereby requests this Court to enter an Order requiring Respondent to provide responses to the relevant post-judgment interrogatories, as well as production of all relevant documents.

Finally, pursuant to CR 37.01(d)(i), Plaintiff requests attorney’s fees in the amount of Seven Hundred Fifty Dollars ($750.00) for bringing the instant Motion.

**NOTICE OF HEARING**

Please take notice that the foregoing Motion shall come before the County County Circuit Court, for hearing on **Day, Month Day, Year at Time:00 a.m.**, or as soon thereafter as the parties may be heard.

Respectfully Submitted,

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Attorney, Esq.

Attorney Law Group

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Attorney@AttorneyLawGroup.com

*COUNSEL FOR PLAINTIFF*

**CERTIFICATE OF SERVICE**

This is to certify that a true and exact copy of the foregoing ***Motion to Compel*** was filed on the Courtnet CM/ECF system and delivered by U.S. mail, postage prepaid, on Month Day, Year, to the following:

Defendant 1

Address.

City, State Zip

*RESPONDENT, PRO SE*

Hon. Judge

County Circuit Judge

P.O. Box ##

Address.

City, State Zip

Attorney, Esq.