|  |  |  |
| --- | --- | --- |
| STATE OF SOUTH CAROLINA  COUNTY OF {county\_name\_allCaps}  {plaintiff\_name},  {plaintiff\_number},  vs.  {defendant\_name},  {defendant\_number}.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | )  )  )  )  )  )  )  )  )  )  )  )  ) | {court\_name\_allCaps}  CASE NO. {case\_number}  **MOTION FOR DEFAULT, SUMMARY JUDGMENT, AND A DAMAGES HEARING AS TO {defendants\_for\_default}** |

YOU WILL PLEASE TAKE NOTICE that the plaintiff, by and through {plaintiff\_sex} undersigned attorney, will move at a date and time to be set by the Court for a default order and judgment {against\_the\_defendant}.

**BACKGROUND**

**LEGAL ARGUMENT**

**Case specific argument**

The plaintiff respectfully requests that the Court grant summary judgment to the plaintiff. Requests for Admission were served with the complaint. Responses were due 45 days later, on {date\_45\_days\_after\_filing\_date}, for {defendants\_for\_default}. As of the filing of this motion, the plaintiff has not received any responses to Requests for Admission. The requests are therefore deemed admitted, proving the plaintiff’s case. There is no genuine issue as to any material fact, and summary judgment is proper. If the Court denies the plaintiff’s motion for default, then the plaintiff respectfully requests that the Court grant summary judgment.

**CONCLUSION**

Since {defendants\_for\_default\_is\_in} default, the plaintiff respectfully requests that the clerk enter a judgment in the plaintiff’s favor {against\_those\_defendants} and schedule a damages hearing. In the alternative, the plaintiff respectfully requests that the Court grant summary judgment.

Respectfully Submitted,

{footer\_firm\_name}

*{s\_attorney\_filing}*

{footer\_attorney\_1\_name\_bar}

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{footer\_attorney\_1\_email}

{footer\_attorney\_2\_email}

{footer\_attorney\_3\_email}

Attorneys for Plaintiff

{footer\_city\_state}

{filing\_date}