|  |  |  |
| --- | --- | --- |
| 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}  **PLAINTIFF’S**  **MOTION TO COMPEL** |

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 an order {compelling\_the\_defendant\_disc} to provide discoverable information requested by the plaintiff and to produce the documents requested by the plaintiff, which are reasonably calculated to lead to the discovery of admissible evidence.

The plaintiff served written interrogatories, requests for production, and requests for admission on {discovery\_served\_date}. A review of the file indicates {that\_the\_defendant} has not served responses as of the date of this filing. The plaintiff respectfully requests that the Court order the defendants to fully respond to discovery requests so that the plaintiff may prepare for depositions and for trial.

Respectfully Submitted,

{footer\_firm\_name}

*{s\_attorney\_filing}*

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{footer\_attorney\_3\_email}

Attorneys for Plaintiff

{footer\_city\_state}

{filing\_date}