

[Your Name/Attorney Name]
[Your Address]
[Phone Number]
[Email Address]

[Date]

[Opposing Counsel Name]
[Opposing Counsel Law Firm]
[Opposing Counsel Address]

Re: [Case Name]
Case Number: [Case Number]
Court: [Name of Court]

NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER

To All Parties and Their Attorneys of Record:

PLEASE TAKE NOTICE that on [Date], at [Time], or as soon thereafter as the matter may be heard in Department [Department Number] of the above-entitled Court, [Moving Party Name] will move the Court for a protective order pursuant to [Cite Local Statute/Rule, e.g., FRCP 26(c)].

This motion is made on the grounds that the discovery requested by [Opposing Party Name] in the [Name of Discovery Request, e.g., First Set of Interrogatories], dated [Date], is [State Grounds, e.g., irrelevant, overly burdensome, seeks privileged information, or intended for harassment].

Specifically, [Moving Party Name] seeks an order that:

- [Item 1: e.g., The discovery not be had;]
- [Item 2: e.g., The discovery be had only on specified terms and conditions;]
- [Item 3: e.g., Certain matters not be inquired into.]

This motion is based upon this Notice, the attached Memorandum of Points and Authorities, the Declaration of [Name], and all records and files in this action.

Respectfully submitted,

[Signature]

[Printed Name]
Attorney for [Plaintiff/Defendant]