

Sample Motion to Compel

IN THE FAMILY COURT OF GREENWOOD COUNTY
STATE OF SOUTH CAROLINA

Case No. 2025-DR-17-00456

IN THE MATTER OF:

JENNIFER TAYLOR,

Plaintiff,

v.

MICHAEL TAYLOR,

Defendant.

MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS

The Plaintiff, Jennifer Taylor, through her undersigned counsel, respectfully requests that this Honorable Court enter an Order compelling the Defendant, Michael Taylor, to respond to outstanding discovery requests and for appropriate sanctions, and in support thereof states the following:

1. On **May 15, 2025**, Plaintiff served the Defendant with the following discovery requests in accordance with the South Carolina Rules of Civil Procedure:
 - a. **Interrogatories**,
 - b. **Request for Production of Documents**, and
 - c. **Request for Admissions**.(See attached Certificate of Service and discovery documents.)
2. Pursuant to the applicable Rules, Defendant's responses were due within thirty (30) days, no later than **June 14, 2025**.
3. As of the date of this filing, **July 15, 2025**, Defendant has failed to respond to any of the discovery requests or request an extension.

4. On **June 24, 2025**, Plaintiff's counsel sent a follow-up email to Defendant's counsel in a good-faith effort to resolve the issue without court intervention. No response was received.
5. A second communication was sent on **July 1, 2025**, warning that a motion to compel would be filed if no discovery responses were received by **July 5, 2025**. Again, no reply was given.
6. The Defendant's refusal to respond to discovery is impeding the Plaintiff's ability to adequately prepare for trial, particularly with regard to financial disclosures relevant to equitable distribution, child support, and custody arrangements.
7. Defendant's conduct demonstrates a willful disregard for the discovery process and is unnecessarily prolonging litigation, to the detriment of the Plaintiff and contrary to the interests of judicial efficiency.
8. Plaintiff therefore requests that the Court issue an Order compelling the Defendant to provide complete responses to all outstanding discovery requests within ten (10) days of the Court's Order.
9. Plaintiff further requests that the Court impose appropriate sanctions on the Defendant for failure to comply with discovery obligations, pursuant to Rule 37 of the South Carolina Rules of Civil Procedure.
10. A proposed Order is attached hereto for the Court's convenience.

**Respectfully submitted, this 15th day of
July, 2025.**

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of July, 2025, I served a true and correct copy of the foregoing Motion to Compel Discovery and for Sanctions upon counsel for Defendant, Mark J. Dennison, via overnight mail addressed to:

Mark J. Dennison
204 Harper Street, Suite B
Greenwood, SC 29646

Emma L. Brooks