

**IN THE 21st JUDICIAL CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI**

GIGANTIC BANK CORP,

Plaintiff,

v.

Sam Doe,

Defendant,

Case No. 123-ABC-2024

MOTION TO COMPEL DISCOVERY

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COMES NOW Defendant Sam Doe (“Defendant”), and for Defendant’s Motion to Compel Discovery pursuant to Missouri Supreme Court Rules 56 and 61, states as follows:

1. On _____, 2025, Defendant served Plaintiff Gigantic Bank Corp. (“Plaintiff”) with Defendant’s First Set of Discovery Requests, including Interrogatories and Requests for Production, in accordance with the Missouri Rules of Civil Procedure.
2. Plaintiff was required to serve full and complete responses within thirty (30) days of service.
3. As of the date of this filing, more than thirty (30) days have passed, and Plaintiff has failed to provide any responses, objections, or requests for additional time.
4. Plaintiff’s failure to respond has prejudiced Defendant’s ability to prepare a defense, evaluate the alleged debt, and determine whether Plaintiff possesses admissible evidence sufficient to establish a prima facie case.
5. Defendant has made a good-faith effort to obtain the requested discovery without court intervention, but Plaintiff has not responded.

6. Pursuant to Missouri Supreme Court Rule 61.01, Defendant is entitled to an order compelling Plaintiff to provide full and complete responses to Defendant's discovery requests.

WHEREFORE, Defendant respectfully requests that this Court enter an Order compelling Plaintiff to serve full and complete responses to Defendant's First Set of Interrogatories and Requests for Production within ten (10) days, and for such other and further relief as the Court deems just and proper.

[Attorney Name], #41876

Attorney for Defendant Sam Doe

[Law Firm Name]

[Address]

[City, State ZIP]

Telephone: (555) 555-0000

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CERTIFICATE OF SERVICE

I hereby certify that on this ___ day of _____, 2025, the foregoing Motion to Compel Discovery was filed with the Court and served via the Missouri eFiling System upon all counsel of record, including:

[Opposing Counsel's Name]

[Opposing Firm Name]

[Opposing Firm Address]

Attorney for Plaintiff Gigantic Bank Corp

[Attorney Name], #41876

Attorney for Defendant Sam Doe