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(NAME)

(ADDRESS)

(CITY, STATE, ZIP)

(TELEPHONE)
[] Plaintiff [] Defendant, *Pro Se*

**JUSTICE COURT,
CLARK COUNTY, NEVADA**

Plaintiff,
vs.

Defendant,

)
) Case No.:
) Dept. No.:
)
)
)
)
)
)
)

MOTION FOR LEAVE TO CONDUCT DISCOVERY

Pursuant to JCRCP 25A(a), [] Plaintiff [] Defendant, _____,
pro se, moves this Court for leave to conduct discovery.

Pursuant to Nevada Revised Statute 53.045, I declare under penalty of perjury that the
foregoing is true and correct.

DATED this ____ day of _____, 20____,

[] Plaintiff [] Defendant, *Pro Se*

///
///
///
///

1 **NOTICE OF MOTION**

2 YOU AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the undersigned will
3 bring the foregoing **MOTION FOR LEAVE TO CONDUCT DISCOVERY** on for hearing
4 before the above-entitled Court on the _____ day of _____, 20____, _____ .m.
5 of said date, in Department _____ .

6 Pursuant to Nevada Revised Statute 53.045, I declare under penalty of perjury that the
7 foregoing is true and correct.

8 DATED this ____ day of _____, 20 ____,

9
10
11 _____
12 [] Plaintiff [] Defendant, *Pro Se*

13
14 **POINTS AND AUTHORITIES**

15 JRCF Rule 25A provides, in pertinent part, as follows:

16 (a) *Leave of court required.* Except as stated in subsection (b), the taking
17 of depositions, the propounding of interrogatories, the requesting of admissions
18 and all other procedures authorized by Rules 26 through 37 are available only
19 with leave of court first obtained and subject to the limitations, if any, imposed by
the court. In exercising its discretion in determining whether discovery will be
permitted or limited, the court shall consider:

- 20 (1) whether all parties are represented by counsel,
21 (2) whether the factual and legal issues lend themselves to discovery,
22 limited or otherwise,
23 (3) the anticipated expense for discovery likely to be incurred by a party,
24 (4) the amount in controversy,
25 and (5) whether undue delay bringing the case to trial or a hearing will result,
26 (6) whether the interests of justice will be promoted.

27 Here, the moving party seeking discovery is appearing *pro se*. In order to ascertain the
28 facts and narrow the issues in the case, the moving party requests leave of this Court to propound

1 _____ interrogatories, requests for admissions, and requests for production of documents and to
2 conduct _____ deposition(s).

3 The anticipated expense of the discovery is minimal inasmuch as the moving party only
4 desires to propound limited discovery. Granting this request to conduct discovery will not delay
5 bringing the instant matter to trial because no trial date has been scheduled as of yet. The only
6 manner in which the moving party can determine the issues is to be able to conduct the discovery
7 requested.

8 Pursuant to Nevada Revised Statute 53.045, I declare under penalty of perjury that the
9 foregoing is true and correct.

10 DATED this ____ day of _____, 20____,

11
12
13 _____
[] Plaintiff [] Defendant, *Pro Se*

14
15
16 **CERTIFICATE OF MAILING**

17 I HEREBY CERTIFY that on the _____ day of _____, 20____, I
18 placed a true and correct copy of the foregoing **MOTION FOR LEAVE TO CONDUCT**
19 **DISCOVERY** in the United States Mail at Las Vegas, Nevada, with first-class postage prepaid,
20 addressed to the following:

21 _____
22 _____
23 _____
24 _____

25
26
27 _____
[] Plaintiff [] Defendant, *Pro Se*