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III.

ARGUMENT

A. THE COURT IS AUTHORIZED TO GRANT THIS MOTION TO COMPEL  
RESPONSES BECAUSE OF \_\_\_\_\_'S BLATANT FAILURE TO COMPLY  
WITH THE DISCOVERY ACT

*Code of Civil Procedure* § 2031.300(b), states in pertinent part that if a party fails to respond to a demand for inspection of documents, the propounding party may move the court for an order compelling responses. There is no time limit for bringing the motion to compel. The party to whom the inspection demand is directed also waives any objection to the demand unless the party's failure to serve a response was due to "mistake, inadvertence, or excusable neglect." *Code of Civil Procedure* § 2031.300(a). In addition, the court "shall" impose monetary sanctions against a party who unsuccessfully opposes a motion to compel unless it finds that the party acted "with substantial justification" or other circumstances render sanctions "unjust." *Code of Civil Procedure* § 2031.300(c).

The moving party is also not required to show a "reasonable and good faith attempt" to resolve the matter informally with opposing counsel before filing the motion. *Sinaiko Healthcare Consulting, Inc. v. Pacific Healthcare Consultants* (2007) 148 Cal.App.4th 390, 404 (2007).

No separate statement is required when no response has been provided to the discovery. *California Rule of Court* 3.1345(b).

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