

RLO

REMOTE LEGALOPS, LLC

RLO REPORT

DISCOVERY ORDER ENFORCEMENT

[REDACTED] | Compliance, sanctions,
contempt OSC, and the [REDACTED] motion

PREPARED FOR ATTORNEY REVIEW

PREPARED FOR

[REDACTED]

PREPARED BY

Remote LegalOps, LLC

MATTER / PROJECT

[REDACTED] | [REDACTED]

DATE

[REDACTED]

CLASSIFICATION

Attorney Work Product

VERSION

v1.0

SYSTEMS. WORKFLOWS. OUTCOMES.

EXECUTIVE SUMMARY

Prepared for [REDACTED] | [REDACTED] | Case No. [REDACTED]

RECOMMENDED APPROACH

Preserve the [REDACTED] further-response motion. Verify the notice-of-entry service date and the expired compliance deadline before alleging disobedience. If FI 17.1 remains deficient after that deadline, seek focused enforcement and sanctions; pursue a formal contempt OSC only on a sufficient factual record.

This report updates the earlier discussion after review of the signed discovery order and filed notice of entry. It addresses the defense of [REDACTED] against plaintiff [REDACTED] before [REDACTED]. The hearing date of [REDACTED] is user-reported; the filed motion notice and reservation were not reviewed.

Key findings

- The operative order provides [REDACTED] from notice of entry for a complete, verified, objection-free FI 17.1 response and [REDACTED] for payment of [REDACTED]. It does not impose the earlier draft's [REDACTED] deadlines. [S1, ¶¶ 1–3.]
- The order addresses FI 17.1 for specified RFAs. It requires identification of supporting documents, not their production, and contains no separate command to correct the earlier verification. [S1, ¶¶ 1–2.]
- The notice is dated [REDACTED] and file-stamped [REDACTED]. The reviewed four-page notice packet contains no proof of service. As of [REDACTED] an expired deadline and contempt cannot be established from those documents alone. [S2, pp. 1–4.]
- The earlier integrated MPA addresses different further-response disputes. Enforcement of the FI 17.1 order and formal contempt require their own supported grounds and adequate notice; the existing hearing reservation does not automatically cover new relief. [S3; CCP §§ 2023.040, 1211.]

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02 Enforcement	4	Available discovery sanctions and the focused motion packet.
03 Contempt OSC	5	Charging facts, application documents, service, and hearing protections.
04 [REDACTED] motion	6	Further-response procedure, independent deadlines, and late compliance.
05 [REDACTED] and action plan	7	Local presentation, recommended sequence, and attorney decisions.
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05 [REDACTED] PRACTICE AND ACTION PLAN

5.2 Recommended sequence and completion criteria

Priority	Action	Proposed owner	Complete when
Now	Obtain actual NOE service proof, method, and recipient; review any later order or stay.	Kyle; [REDACTED] reviews	Trigger and applicable compliance dates are documented.
Now	Audit all incoming FI 17.1 responses and sanctions payments.	Kyle	Dated record distinguishes no response, partial compliance, and payment status.
Now	Obtain filed [REDACTED] packet and service proof; audit 45-day and trial cutoffs.	Kyle; [REDACTED] reviews	Timeliness and scope of noticed relief are confirmed.
After verified breach	Prepare focused enforcement motion and proportionate sanctions request.	Kyle drafts; [REDACTED] approves	Every requested remedy maps to the order and supporting evidence.
If counsel elects	Prepare charging affidavit and application for a contempt OSC; confirm setting.	[REDACTED] Kyle supports	Elements, charges, proposed relief, service, and hearing are supported.
Before hearing	Review new responses; narrow resolved disputes; check tentative and appearances.	[REDACTED] and Kyle	Court receives an accurate current account of unresolved issues.

5.3 Decisions for counsel

- Determine the legally operative notice-of-entry trigger and whether any service extension applies to the order's [REDACTED]
- Select the least extensive sanction that addresses the proven discovery prejudice, and decide whether formal contempt adds practical value beyond enforcement.
- Decide whether to calendar a separate enforcement motion, seek permitted amendments to existing papers, or request a separate contempt setting; do not assume consolidation.
- Authorize any sanctions collection only after confirming the payment deadline, outstanding balance, and absence of a stay. Keep collection expenses distinct from discovery-motion and contempt fees.