

VIRGINIA:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

ORDER RELATING TO REQUIREMENTS FOR DISCOVERY REQUESTS

By my authority pursuant to Section 17.1-501 of the 1950 Code of Virginia, as amended, it is **ORDERED** as follows:

1. Discovery Motions:

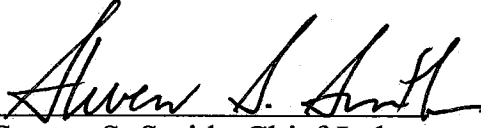
Discovery requests that are subject to a motion to compel or a motion for a protective order should be attached to the motion, as provided by Rule 4:8(c) of the Va. Supreme Court Rules. Counsel shall:

- 1) make a good faith effort to resolve and/or narrow discovery disputes prior to court intervention to the extent possible, as provided for in Rule 4:15 of the Va. Supreme Court Rules,
- 2) make a reasonable effort to agree on the date to have the motion heard, and
- 3) include a **discovery chart**, as an exhibit to every Motion to Compel (unless there is a complete failure to respond or object to every discovery request). The discovery chart **shall** include the following:
  - a) the discovery question or request,
  - b) the answer or objection, and
  - c) the alleged deficiency

Failure to include a discovery chart or follow the format above<sup>1</sup> will result in the removal of the Motion to Compel from the Court's docket.

2. This Order amends the Prince William County Circuit Court Practice Guidelines adopted November 1, 2018, Section D - Civil Practice Guidelines, Number 3.07(a); and
3. This Order is effective August 10, 2020, and supersedes any prior order concerning these matters.

Entered this 27th day of July 2020.

  
Steven S. Smith, Chief Judge

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<sup>1</sup> An example of how the discovery chart should be completed is attached to this order as Exhibit A.

Exhibit A

INSTRUCTIONS: A discovery chart shall be completed and submitted as an exhibit to the Motion to Compel at the time it is filed with the Clerk's office. The information included in the "Request" column should be copied verbatim from the request sent to the opposing party. If applicable, the information included in the "Answer/Objection" column should be copied verbatim from the response that was provided to you. Lastly, the "Alleged Deficiency" column should clearly and concisely state the alleged deficiency or why the objection should be overruled. Failure to include a discovery chart or follow the format below will result in the removal of the Motion to Compel from the Court's docket.

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Below is an example of how the discovery chart should be completed.

**EXHIBIT 1**

1. Case Name: Doe v. Doe
2. Case Number: CL20-0000-00
3. Discovery Requested: Interrogatories, Request for Production of Documents, Request for Admission etc.

**Check this box if there has been no responses or objections to all the propounded discovery requests. If this box is checked, completion of the discovery chart is NOT required.**

No.	Question/ Request	Answer/ Objection	Alleged Deficiency
Interrogatory #			
Request for Production of Documents #			
Request for Admissions #			