

ATTORNEY Bar #(0000)

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FIRM NAME

Attorneys for CLIENT

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IN THE THIRD JUDICIAL DISTRICT JUVENILE COURT

IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

THE STATE OF UTAH, in the)	MOTION AND ORDER TO SHORTEN
interest of:)	TIME FOR DISCOVERY
)	
)	
CHILD (00/00/00))	Case #
)	
)	
A person(s) under the age)	JUDGE
of eighteen years.)	

COMES NOW Respondent, CLIENT, by and through counsel, and hereby moves this court pursuant to Utah Rules of Civil Procedure 33 and 34 to shorten the period of time in which the Utah Division of Family Services and the above-named child(ren) must answer Respondent's discovery requests. Respondent brings this motion based upon the following memorandum.

MEMORANDUM

(1) Under Utah Rules of Civil Procedure 33 and 34, a party is afforded thirty days from receipt of a discovery request in which to answer. The same Rules also state that the court may allow a longer or shorter time.

(2) Given the strict statutory time constraints imposed in abuse, neglect and dependency

cases under Utah Code Ann. §78-3a-308, the normal thirty-day response period for discovery would allow Respondent's counsel insufficient time to review discovery prior to trial.

WHEREFORE, Respondent's counsel moves this court for an order requiring the Utah Division of Family Services and the above-named child(ren) to answer Respondent's discovery requests no later than fifteen days after receipt of such requests.

DATED this _____ day of _____, 2003.

ATTORNEY
Attorney for Respondent

ORDER

Upon ex parte motion of Respondent, and for good cause shown, IT IS HEREBY ORDERED that the Utah Division of Family Services, and the above-named child(ren), have fifteen days from receipt of Respondent's discovery requests in which to respond to such requests.

DATED this _____ day of _____, 2003.

BY THE COURT:

Third District Juvenile Court Judge

CERTIFICATE OF MAILING

I hereby certify that on this ____ day of _____, 2003, I mailed a true and correct copy of the foregoing Ex Parte Motion to Shorten Time for Discovery to:

STATE OF UTAH
ATTORNEY GENERAL'S OFFICE

GUARDIAN AD LITEM
