

IN THE JUVENILE COURT OF [name] COUNTY

STATE OF GEORGIA

In Re:) FILE NO: [file number, if using]
)
[child's name]) CASE NO: [case number]
[sex], [age], [date of birth])
)

**MOTION FOR DISCOVERY, HEARING ON REQUEST FOR DISCOVERY
AND CONTINUANCE FROM COURT'S CALENDAR**

Comes now the attorney for [your client] and moves this court to allow discovery pursuant to U.J.C.R. 7.3 and continue the hearing set for [next scheduled hearing date] until such time as the Motion for Discovery has been addressed. Counsel for mother makes this request for good cause and shows the following.

1. The requested documents are within the custody and control of [whoever has the documents]
2. Respondent's motion for discovery is timely in that is being filed within five (5) days of the scheduled hearing.
3. Respondent's request to inspect and review the evidence is necessary to show state your reasons for needing the discovery].

Wherefore, the mother respectfully requests that the court issue an order to DeKalb DFCS pursuant to O.C.G.A. 15-11-41 providing the mother with a copy of the psychological and parental fitness evaluation previously ordered by this court.

RESPECTFULLY SUBMITTED THIS _____ day of [month], 20_____.

[your name], Attorney for Mother

[address]
[phone]
[email]

IN THE JUVENILE COURT OF [name] COUNTY

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ORDER FOR RELEASE OF INFORMATION

The Court, having reviewed Plaintiff's Motion for Discovery of certain documents within the custody and control of the [custodian of record] hereby orders, pursuant to O.C.G.A. 15-11-41, the release of [requested documents]

[custodian of records] is ordered to provide a copy of [requested documents] with any reasonable redaction of the names or confidential personal information of persons not a party to this case to counsel within ten (10) days of this order. The information obtained may only be used in proceedings pending before this court and dissemination of the [requested documents] is limited to the parties and their counsel in this case. Further dissemination beyond those authorized within this order shall result in sanction by the court.

SO ORDERED this _____ day of [month], 20____.

[NAME OF JUDGE]
[county] Juvenile Court

Order prepared and presented by
[your name], Counsel for [your client]
[address]
[phone]

IN THE JUVENILE COURT OF [name] COUNTY

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REQUEST FOR DISCOVERY

Comes now counsel for [your client] and requests the named parties produce the following documents for inspection and copying in their respective places of business no later than fourteen (14) days prior to the adjudication hearing.

1. From [custodian of record]: [requested documents]

Submitted this _____ day of [month], 20_____.

[your name], Attorney for [your client]
[address]
[phone]

CERTIFICATE OF SERVICE

I have this _____ day of [month] , 20_____ served the foregoing MOTION FOR DISCOVERY AND CONTINUANCE and REQUEST FOR DISCOVERY on the parties listed below and the addresses shown via regular U.S. mail, electronic mail or facsimile transmittal.

Opposing counsel's name
Opposing counsel's address
Opposing counsel's e-mail
Opposing counsel's fax number

This _____ day of [month], 20_____.

[your name], Attorney for [your client]
[address]
[phone number]