

Summary of Contents

PART I. EFFECTIVE MOTION STRATEGY AND TACTICS	1
Chapter 1. Introduction.....	1
Chapter 2. Document Preparation and Service	11
Chapter 3. Sanctions in Motion Practice.....	59
Chapter 4. Oral Argument of Motions.....	99
PART II. MOTIONS THAT MAY ELIMINATE TRIAL	163
Chapter 5. Motion to Quash Service of Summons.....	163
Chapter 6. The Demurrer.....	193
Chapter 7. Motion for Judgment on the Pleadings.....	233
Chapter 8. Motion for Summary Judgment.....	259
Chapter 9. Arbitration Petitions	323
Chapter 10. Motions to Dismiss	385
Chapter 11. Motion to Determine Good Faith Settlement.....	423
Chapter 12. Motion to Enforce Settlement	451
Chapter 13. Entry of Default and Default Judgment....	483
PART III. MOTIONS TO DETERMINE SCOPE OF CASE	509
Chapter 14. Motion to Strike Pleadings.....	509
Chapter 15. Motion to Amend or Supplement Pleadings	543
Chapter 16. Motion for Summary Adjudication of Issues.....	567
PART IV. MOTIONS RELATING TO PARTIES AND COUNSEL	603
Chapter 17. Motion to Withdraw or Be Relieved As Counsel	603

Chapter 18. Motion to Disqualify or Recuse Opposing Counsel	623
Chapter 19. Application for Permission to Appear Pro Hac Vice	659
PART V. MOTIONS RELATING TO CASE MANAGEMENT	671
Chapter 20. Motion for Change of Venue	671
Chapter 21. Motions to Reclassify Cases	699
Chapter 22. Motions to Consolidate and Sever	721
Chapter 23. Motion to Bifurcate	745
Chapter 24. Motions for Trial Preference.....	765
Chapter 25. Motion to Continue Trial	787
PART VI. CORRECTIVE MOTIONS	813
Chapter 26. Motions to Set Aside Default or Dismissal .	813
Chapter 27. Motions for Reconsideration.....	871
Chapter 28. Motions to Correct Mistakes.....	899
PART VII. DISCOVERY MOTIONS	917
Chapter 29. Discovery Motions.....	917
Chapter 30. Discovery References.....	977
PART VIII. EX PARTE PROCEEDINGS	1007
Chapter 31. Ex Parte Proceedings	1007
Table of Laws and Rules	
Table of Cases	
Index	