

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH
DAKOTA

Julian Pierce Williams v. Paul Olthoff, et al.

Williams v. Olthoff · No. 1:25-cv-058 · Decided February 11, 2026

SUMMARY

The United States District Court for the District of North Dakota denied without prejudice a pro se plaintiff’s motion to compel answers to interrogatories. The court held that the plaintiff failed to identify the interrogatories, certify a good-faith conferral effort, request the required telephonic conference, or otherwise comply with Federal Rule of Civil Procedure 37, Local Rule 37.1, and the court’s prior order.

CASE DETAILS

COURT	United States District Court for the District of North Dakota
WRITING FOR THE COURT	Clare R. Hochhalter
JURISDICTION	United States District Court for the District of North Dakota
DECIDED	February 11, 2026
DOCKET	1:25-cv-058
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel Defendants to answer interrogatories. The court denied the motion without prejudice because Plaintiff did not satisfy the meet-and-confer, certification, and pre-motion telephone-conference requirements.
STANDARD OF REVIEW	The court applied the procedural requirements governing motions to compel under Federal Rule of Civil Procedure 37(a)(1), Local Rule 37.1, and the court's prior order.
PRECEDENTIAL VALUE	Unknown
PARTIES	Julian Pierce Williams v. Paul Olthoff, et al.

TOPICS

- discovery dispute
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff's motion to compel should be granted when he failed to identify or attach the interrogatories at issue and failed to comply with the meet-and-confer, certification, and pre-motion conference requirements.
2. Whether Plaintiff's pro se status excused his noncompliance with the Federal Rules of Civil Procedure, the local rules, and the court's prior discovery order.

HOLDINGS

1. A party seeking an order compelling discovery must comply with Federal Rule of Civil Procedure 37(a)(1), Local Rule 37.1, and the court's prescribed pre-motion procedures, including a good-faith meet-and-confer and, when required, a telephone conference with the magistrate judge. Because Plaintiff did not comply, his motion to compel was procedurally improper and was denied without prejudice.
2. Pro se litigants must comply with the Federal Rules of Civil Procedure, applicable local rules, and court orders; Plaintiff's pro se status did not excuse his failure to comply with the discovery-motion prerequisites.

KEY QUOTATIONS

"Even pro se litigants must comply with court rules and directives." (at 2)

"Plaintiff's motion to compel (Doc. No. 72) is therefore procedurally improper and DENIED without prejudice." (at 3)

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, claimed that Defendants had not responded to interrogatories served on or about December 29, 2025. He did not identify or attach the interrogatories, certify that he had conferred or attempted to confer in good faith with Defendants, or request the required telephone conference with the magistrate judge.

PROCEDURAL HISTORY

Plaintiff filed a motion to compel on February 10, 2026, asserting that Defendants had not answered interrogatories served on or about December 29, 2025. A prior September 24, 2025, order required the parties to confer in good faith, request a telephone conference with the magistrate judge if necessary, and comply with Federal Rule of Civil Procedure 37(a)(1) and Local Rule 37.1 before filing discovery motions. The court found that Plaintiff had not followed those prerequisites and denied the motion without prejudice.

DISPOSITION

other

CASES CITED

- Aery v. Nohre, No. 22-CV-491 (PJS/TNL), 2022 WL 4136620, at *5 (D. Minn. Aug. 5, 2022)
- Soliman v. Johanns, 412 F.3d 920, 922 (8th Cir. 2005)
- Bennett v. Dr. Pepper/Seven Up, Inc., 295 F.3d 805, 808 (8th Cir. 2002)
- Burgs v. Sissel, 745 F.2d 526, 528 (8th Cir. 1984)

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