

[Your Name/Law Firm]

[Address Line 1]

[City, State, Zip Code]

[Email Address]

[Phone Number]

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address Line 1]

[City, State, Zip Code]

Re: [Case Name]

Case Number: [Case Number]

Subject: Discovery Dispute Resolution Progress Update

Dear [Opposing Counsel Name],

I am writing to provide a formal update regarding the ongoing discovery disputes in the above-referenced matter, following our meet-and-confer session held on [Date].

As discussed, the following items remain outstanding or are currently being addressed:

- **[Item 1]:** [Brief description of status, e.g., Documents are being gathered and will be produced by Date].
- **[Item 2]:** [Brief description of status, e.g., We are awaiting a supplemental response regarding Interrogatory No. X].
- **[Item 3]:** [Brief description of status, e.g., The parties have reached an agreement regarding the scope of the ESI search terms].

Regarding the unresolved issue of [Specific Dispute Name], it is our position that [Brief statement of your position]. We are currently reviewing [Legal Authority/Specific Document] and anticipate providing a final proposal by [Date].

We remain committed to resolving these discovery matters without further court intervention. Please notify us by [Date] if you disagree with any of the progress points outlined above.

Sincerely,

[Your Signature]

[Your Printed Name]