

[Sender Name]
[Sender Title]
[Company/Law Firm Name]
[Date]

[Recipient Name]
[Recipient Title]
[Recipient Company/Law Firm Name]

RE: Discovery Production Progress Update - [Case Name/Reference Number]

Dear [Recipient Name],

I am writing to provide a formal update regarding the status of our discovery production in the above-referenced matter.

As of [Current Date], we have completed the following stages of the production process:

- [Completed Item 1, e.g., Data collection from key custodians]
- [Completed Item 2, e.g., Initial privilege review]
- [Completed Item 3, e.g., Processing of electronic files]

We are currently working on [Current Stage, e.g., final quality control and Bates stamping]. We anticipate that the next rolling production, consisting of approximately [Number] documents, will be delivered via [Method of Delivery] on or before [Expected Date].

Regarding the remaining items requested in your letter dated [Date of Opposing Counsel's Letter], we are still addressing [Specific Issues or Extensions]. We expect to provide a definitive timeline for these materials by [Date].

Please let us know if you have any questions regarding the progress or the format of the upcoming production.

Sincerely,

[Signature]
[Printed Name]