

[Your Name/Law Firm Name]
[Address]
[City, State, Zip Code]
[Phone Number]
[Email]

[Date]

[Opposing Counsel Name]
[Opposing Law Firm Name]
[Address]
[City, State, Zip Code]

Re: [Case Name]
Court Case No.: [Case Number]

Dear [Opposing Counsel Name],

I am writing to provide an update regarding the outstanding discovery deficiencies previously identified in my letter dated [Date of Previous Letter].

To date, we have not received the supplemental responses or the missing documentation requested regarding the following:

- **[Discovery Request Set, e.g., Interrogatory No. 5]:** [Briefly describe the deficiency].
- **[Discovery Request Set, e.g., Request for Production No. 12]:** [Briefly describe the deficiency].
- **[Discovery Request Set, e.g., Request for Admission No. 3]:** [Briefly describe the deficiency].

As you are aware, these materials are necessary for the progression of this litigation and for our upcoming [Depositions/Hearing/Trial]. We have attempted to resolve these issues informally; however, the deficiencies remain unaddressed.

Please provide the outstanding discovery responses and documents no later than [Date/Time]. If we do not receive the requested materials by this deadline, we will be forced to seek the Court's intervention by filing a Motion to Compel and requesting associated sanctions and fees.

I look forward to your prompt cooperation in this matter.

Sincerely,

[Your Signature]

[Your Printed Name]