

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

[Date]

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

**Re: [Case Name] / [Court Case Number]**

**Subject: Meet and Confer Regarding Deficient Responses to Plaintiff's First Set of Interrogatories**

Dear [Counsel Name],

I am writing to meet and confer in good faith regarding your client's responses to [Party Name]'s First Set of Interrogatories, which were served on [Date]. After reviewing the responses, we find them to be deficient and incomplete for the reasons set forth below.

### **General Objections**

Your responses include boilerplate objections stating that the requests are "overbroad," "unduly burdensome," or "seek irrelevant information." These general objections do not comply with discovery rules, which require specific explanations as to why a particular request is improper.

### **Deficient Responses**

**Interrogatory No. [X]:** [Briefly describe why this specific response is missing information or how the objection is improper.]

**Interrogatory No. [Y]:** [Briefly describe why this specific response is missing information or how the objection is improper.]

We request that you provide supplemental, verified responses that fully address these items without the aforementioned objections by [Date]. If we are unable to resolve these issues, we will be forced to seek the court's assistance through a Motion to Compel.

I am available to discuss this matter via telephone on [Date] at [Time] if you believe a conversation would help resolve these deficiencies.

Sincerely,

[Your Signature]

[Your Printed Name]