

[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] vs. [Case Name]
Case No.: [Case Number]
**Subject: FOLLOW-UP MEET AND CONFER REGARDING
DEFENDANT/PLAINTIFF'S INCOMPLETE INTERROGATORY ANSWERS**

Dear [Opposing Counsel Name],

I am writing this letter as a follow-up to our previous meet and confer efforts on [Date of previous meeting/correspondence] regarding [Party Name]'s responses to [Your Side]'s First Set of Interrogatories, served on [Date].

To date, the supplemental responses provided remain insufficient. Specifically, the following Interrogatories require further clarification or substantive information:

- **Interrogatory No. [X]:** [Briefly state why the answer is incomplete, e.g., "The response fails to identify specific witnesses" or "The response relies on boilerplate objections."]
- **Interrogatory No. [Y]:** [Briefly state why the answer is incomplete.]
- **Interrogatory No. [Z]:** [Briefly state why the answer is incomplete.]

As discussed, these requests seek information that is relevant to the claims and defenses in this matter and are proportional to the needs of the case. The current responses hinder our ability to prepare for depositions and trial.

Please provide full and complete supplemental responses, without objections, no later than [Date/Time]. If we do not receive these responses or a definitive timeline for their production by that date, we will be left with no choice but to seek the Court's intervention by filing a Motion to Compel.

I remain available to discuss these issues further if you believe a phone call would resolve these outstanding items without court involvement.

Sincerely,

[Your Signature]

[Your Printed Name]