

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

[Date]

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

**Re: [Case Name] / Case No: [Case Number]**

**Subject: Meet and Confer Regarding Objections to Plaintiff's/Defendant's First Set of Interrogatories**

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve discovery disputes regarding your client's responses to [Party Name]'s First Set of Interrogatories, served on [Date]. Your responses, received on [Date], consist largely of "boilerplate" objections that fail to comply with the requirements of the Rules of Civil Procedure.

### **General Objections**

Your responses include a "General Objections" section. Please be advised that general or "blanket" objections are improper and have no legal effect. Objections must be stated with specificity as they apply to each individual request. We request that you withdraw these general objections and provide supplemental responses.

### **Boilerplate Objections to Specific Interrogatories**

For Interrogatory Nos. [List numbers, e.g., 1, 3, 5], you have objected on the grounds that the requests are "overbroad, unduly burdensome, vague, and/or not reasonably calculated to lead to the discovery of admissible evidence." These are unsupported, boilerplate objections. You have failed to explain how the requests are burdensome or why the information sought is irrelevant. Under [Cite Local Rule or Case Law], the objecting party must provide specific facts to support such claims.

### **Withholding Responsive Information**

Despite your objections, you have stated that you will produce documents or information "subject to and without waiving" said objections. This makes it impossible for us to determine if any responsive information is being withheld. Please confirm whether any responsive material is being withheld based on your objections.

**Proposed Resolution**

We request that you provide verified, supplemental responses that address these deficiencies by [Date]. If we do not receive supplemental responses or a meaningful commitment to produce them by that date, we will be forced to seek the Court's intervention through a Motion to Compel.

I am available to discuss this matter via telephone on [Date/Time] if you believe a conversation would lead to a quicker resolution.

Sincerely,

[Your Signature]

[Your Printed Name]