

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

[Date]

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

Re: [Case Name]  
Case No.: [Case Number]  
Subject: Meet and Confer Regarding Defendant/Plaintiff's Evasive Discovery Responses

Dear [Counsel Name],

I am writing to meet and confer in a good faith effort to resolve discovery disputes regarding your client's responses to [Propounding Party]'s [First/Second] Set of Interrogatories, served on [Date]. Upon review, your client's responses are deficient, evasive, and non-responsive as outlined below.

**Interrogatory No. [Number]:**

Your response to this Interrogatory is evasive because [explain why, e.g., it fails to provide specific dates, refers generally to documents without identifying them, or uses boilerplate objections to avoid a substantive answer]. We demand a supplemental response that provides a complete, straightforward answer as required by [State/Federal Rule of Civil Procedure].

**Interrogatory No. [Number]:**

The response provided is non-responsive. Specifically, the response [explain deficiency, e.g., answers a different question than asked or provides incomplete information regarding key witnesses]. Please provide the specific information requested regarding [Subject Matter].

**Objections:**

Your client has asserted boilerplate objections including [list objections, e.g., "overbroad" or "unduly burdensome"] without specifying how the request is deficient. Such "word-processed" objections without factual support are improper. We request that you withdraw these objections and provide substantive answers.

The purpose of discovery is to allow for the exchange of relevant information to prevent surprise at trial. The current responses frustrate this purpose. Please provide supplemental, verified responses by [Date/Time]. If we do not receive adequate responses by this date, we will be forced to file a Motion to Compel further responses and seek associated sanctions.

I am available to discuss this matter via telephone on [Date] at [Time] should you wish to resolve this without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]