

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

[Date]

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

**RE: [Case Name and Case Number] - Second Meet and Confer Regarding Uncured Deficiencies in [Party Name]'s Responses to [Set Number] Interrogatories**

Dear [Opposing Counsel Name],

I am writing this second meet and confer letter following our previous correspondence dated [Date of First Letter] and our subsequent discussion on [Date of Discussion, if any] regarding the deficiencies in your client's responses to [Party Name]'s [Set Number] Interrogatories.

To date, the supplemental responses provided on [Date Supplemental Responses Received] remain inadequate and fail to cure the deficiencies previously identified. Specifically, the following Interrogatories remain deficient for the reasons set forth below:

- **Interrogatory No. [Number]:** [Briefly state why the response is still deficient, e.g., "The response continues to rely on vague boilerplate objections and fails to provide facts regarding X."]
- **Interrogatory No. [Number]:** [Briefly state why the response is still deficient, e.g., "The supplemental response refers to documents but fails to specify which documents contain the answers as required by Code."]

Despite my efforts to resolve this discovery dispute informally, your client has not provided full and code-compliant responses. Please consider this a final attempt to meet and confer in good faith before we seek court intervention.

Please provide verified, supplemental responses that fully address the aforementioned deficiencies by [Deadline Date/Time]. If I do not receive compliant responses by that time, I will have no choice but to file a Motion to Compel Further Responses and request monetary sanctions for the necessity of such a motion.

I look forward to your prompt cooperation.

Sincerely,

[Your Signature]

[Your Printed Name]