

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

[Date]

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

Re: [Case Name]; [Case Number]
Subject: Meet and Confer Regarding Discovery Disputes

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to resolve outstanding discovery disputes pursuant to [Insert Local Rule/Code of Civil Procedure].

On [Date], our office served [Plaintiff/Defendant]'s [First/Second] Set of [Interrogatories/Requests for Production]. On [Date], we received your responses. After reviewing the responses, we find several deficiencies that require your immediate attention.

Specific Deficiencies:

1. [Request Number]: Your response included boilerplate objections regarding [overbreadth/relevance/privilege]. However, [explain why the objection is invalid or why the information is discoverable]. We request that you provide a full response and/or produce the responsive documents by [Date].

2. [Request Number]: You indicated that documents would be produced, but as of today, we have not received any production. Please provide an expected date for delivery.

3. [Request Number]: Your objection based on [Privilege] was not accompanied by a privilege log. Please provide a privilege log that complies with [Insert Rule].

It is my hope that we can resolve these issues without the need for court intervention. I am available to discuss these matters via telephone on [Date] at [Time]. If we cannot reach a resolution by [Date], we will have no choice but to move forward with a Motion to Compel.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]