

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

[Date]

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

**RE: [Case Name] vs. [Case Name]**  
**Case No.: [Court Case Number]**  
**Subject: Notice of Meet and Confer Regarding Inadequate Discovery Responses**

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve discovery disputes regarding [Party Name]'s responses to [Your Party Name]'s First Set of Interrogatories, served on [Date].

Upon review, we have found your responses to be deficient and unresponsive for the following reasons:

- 1. General Objections:** Your reliance on boilerplate objections (e.g., "overbroad," "unduly burdensome") without specific factual justification is improper under [Applicable Civil Procedure Rule].
- 2. Incomplete Factual Disclosures:** Specifically, Interrogatory Nos. [List Numbers] request material facts regarding [Subject Matter]. Your current responses fail to provide the requested information and instead offer vague summaries or evasive answers.
- 3. Improper Reference to Documents:** Regarding Interrogatory Nos. [List Numbers], you referred to "produced documents" generally. Under [Applicable Rule], if you rely on records to answer an interrogatory, you must specify the documents in sufficient detail to permit us to locate them as readily as you can.

Please consider this letter a formal request for you to provide supplemental responses that fully disclose the facts requested by [Date]. If we do not receive adequate supplemental responses or a confirmed timeline for their delivery by this date, we will be forced to seek the Court's intervention via a Motion to Compel.

I am available to discuss these issues via telephone on [Date/Time] if you believe a conversation would expedite the resolution of these matters.

Sincerely,

[Your Signature]

[Your Printed Name]