

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

[Date]

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

RE: [Case Name] / [Case Number] - Meet and Confer Regarding Document Production

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve discovery disputes regarding [Plaintiff/Defendant]'s responses and document production served on [Date], in response to [Propounding Party]'s [First/Second] Request for Production of Documents.

After reviewing the production, we find the following deficiencies:

1. General Deficiencies: [Example: The production is missing metadata, is not organized by request number, or contains illegible scans.]

2. Specific Request Deficiencies:

- **Request No. [X]:** [Explain why the production is inadequate, e.g., documents known to exist were not produced, or an overbroad objection was used to withhold responsive material.]
- **Request No. [Y]:** [Explain the deficiency.]

3. Missing Privilege Log: [If applicable: Your responses indicate that certain documents were withheld based on privilege, but no privilege log has been provided to date.]

We request that you provide supplemental responses and the missing documents by [Date]. Please also let me know your availability on [Date/Time] to discuss these issues via telephone if you believe a conference would further clarify these matters.

We hope to resolve these issues without the need for court intervention. I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]