

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

[Date]

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

**RE: [Case Name and Court Case Number]**  
**SUBJECT: SECOND MEET AND CONFER REGARDING DEFICIENT DOCUMENT PRODUCTION**

Dear [Opposing Counsel Name],

I am writing to follow up on our previous meet and confer letter dated [Date of First Letter] and our subsequent conversation on [Date of Conversation, if any] regarding [Party Name]'s production of documents in response to [Name of Request Set, e.g., Plaintiff's First Request for Production of Documents].

To date, the deficiencies identified in our prior correspondence remain unresolved. Specifically, the production is inadequate for the following reasons:

- **Missing Documents:** Despite your assertions, we have not received documents responsive to Request Nos. [List Numbers].
- **Incomplete Production:** The production for Request Nos. [List Numbers] appears to be missing [Specific Category, e.g., email attachments or metadata].
- **Improper Formatting:** The documents were produced in a non-searchable format, contrary to our prior agreement/the court rules.
- **Overbroad Objections:** Your continued reliance on [Specific Objection, e.g., Attorney-Client Privilege] without a corresponding Privilege Log is preventing a meaningful review.

We have attempted to resolve these issues in good faith; however, the current production hinders our ability to proceed with [Upcoming Deadline or Deposition]. Please let us know by [Date/Time] whether you intend to supplement your production with the missing materials.

If we do not receive a commitment to produce the requested documents by the aforementioned date, we will have no choice but to seek the Court's intervention through a Motion to Compel.

I look forward to your immediate response.

Sincerely,

[Your Signature]

[Your Printed Name]