

[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/Case Number]
FINAL MEET AND CONFER REGARDING DEFENDANT'S/PLAINTIFF'S
INADEQUATE DOCUMENT PRODUCTION**

Dear [Opposing Counsel Name],

This letter serves as our final attempt to meet and confer regarding your client's incomplete and inadequate production of documents in response to [Propounding Party]'s [Set Number] Request for Production of Documents, served on [Date].

Despite our previous correspondence dated [Date] and our telephonic conference on [Date], the following deficiencies remain outstanding:

- 1. Request No. [Number]:** [Briefly describe the missing or incomplete documents]. Your current production is insufficient because [state reason, e.g., missing attachments, redacted without privilege log, or failure to search specific ESI].
- 2. Request No. [Number]:** [Briefly describe the missing or incomplete documents]. We previously agreed that these would be produced by [Date], yet we have received nothing to date.
- 3. Privilege Log:** You have withheld documents based on privilege but have failed to provide a privilege log that complies with [State/Federal Rule].

We have attempted in good faith to resolve these discovery disputes without court intervention. However, your client's continued failure to produce responsive, non-privileged documents is prejudicial to our ability to prepare for [deposition/trial/mediation].

Please provide the outstanding documents and a compliant privilege log no later than [Time] on [Date]. If we do not receive the production by this deadline, we will have no choice but to file a Motion to Compel further responses and production, seeking all available sanctions and costs associated with the filing.

We look forward to your immediate compliance.

Sincerely,

[Your Signature]

[Your Printed Name]