

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

[Date]

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

Re: [Case Name and Case Number] - Meet and Confer Regarding Defendant/Plaintiff's Inadequate Production of Documents

Dear [Opposing Counsel Name],

I am writing in good faith to meet and confer regarding the document production served by your client on [Date] in response to [Name of Requesting Party]'s [First/Second] Request for Production of Documents.

Upon review of the production, we have identified several deficiencies that fail to satisfy your client's discovery obligations under [State/Federal] Rules of Civil Procedure. Specifically:

1. Missing Documents for Specific Requests

Your production lacks responsive documents for Request Nos. [List Numbers]. Specifically, we expected to see [describe specific missing categories, e.g., email correspondence between X and Y, or financial ledgers for 2023].

2. Improper Use of General Objections

Your responses rely on boilerplate objections. Please clarify if documents are being withheld based on these objections. If so, please provide a privilege log or the specific legal basis for withholding responsive materials.

3. Format of Production

The documents were produced in a manner that is not organized and labeled to correspond to the categories in the request, nor in the manner in which they are kept in the usual course of business. [Specify issues with metadata, searchable PDFs, etc.].

4. Incomplete Search Terms

Based on the production, it appears that a thorough search of [Custodians/Electronic Systems] was not conducted. We request that you confirm the search parameters and custodians utilized.

We are committed to resolving these discovery issues without court intervention. However, we require the supplemental production of the missing documents or a detailed explanation as to why they cannot be produced by [Date].

Please let me know if you are available for a brief telephone call on [Date] at [Time] to discuss these matters further. I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]