

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

RE: [Case Name and Case Number] - Meet and Confer Regarding Discovery Deficiencies

Dear [Counsel Name],

I am writing to meet and confer regarding [Party Name]'s recent production of documents served on [Date], in response to [Moving Party]'s [Set Number] Request for Production of Documents.

Upon review, we have identified the following deficiencies that must be addressed to avoid formal intervention by the court:

1. Inadequate Document Production

The production appears to be incomplete. Specifically, the following categories of documents are missing or under-produced: [List specific categories or RFP numbers]. Furthermore, the documents provided lack [mention missing metadata, searchable format, or organization by request].

2. Missing Privilege Log

Your response includes several objections based on attorney-client privilege or the work-product doctrine; however, no privilege log was provided. Pursuant to [State/Federal Rule of Civil Procedure], any party withholding responsive documents under a claim of privilege must provide a log describing the nature of the documents, communications, or tangible things not produced, in a manner that enables other parties to assess the claim.

3. Proposed Resolution

We request that you provide the missing responsive documents and a comprehensive privilege log by [Date]. If we do not receive these materials or a definitive timeline for their production by that date, we will be forced to file a Motion to Compel.

I am available to discuss these issues further via telephone on [Date] at [Time]. Please let me know if that time works for you.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]