

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

[Date]

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

Re: [Case Name], Case No. [Case Number]
Subject: Meet and Confer Regarding [Plaintiff/Defendant]'s Inadequate Document Production and Objections to [Set Number] of Document Requests

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve discovery disputes regarding your client's responses and document production served on [Date], in response to our [First/Second] Set of Requests for Production of Documents.

1. General and Boilerplate Objections

Your responses contain numerous "boilerplate" objections, asserting that requests are "overbroad," "unduly burdensome," or "irrelevant" without explaining how the requests are deficient or providing supporting evidence for the burden claimed. Under applicable discovery rules, such general objections are improper and result in a waiver of the objection. We request that you withdraw these generalized objections and provide supplemental responses stating whether all responsive documents are being produced.

2. Inadequate Document Production

To date, the production is deficient for the following reasons:

[Insert Request Number]: [Briefly explain why the production is missing documents or is incomplete].

[Insert Request Number]: [Briefly explain why the production is missing documents or is incomplete].

3. Missing Privilege Log

To the extent you are withholding documents based on attorney-client privilege or work-product doctrine, you have failed to provide a privilege log. Please provide a log that identifies each document withheld with sufficient detail to evaluate the claim of privilege.

4. Format of Production

The documents produced were not [in the requested electronic format / organized and labeled to

correspond to the categories in the request]. Please re-produce these materials in compliance with [Citation to Local Rule/Procedure].

We would like to resolve these issues without court intervention. Please let me know by [Date] if you will provide supplemental responses and the missing documents. I am available to discuss this on [Date/Time] if you believe a telephone conference would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]