

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

[Date]

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

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

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding [Party Name]'s recent production of documents dated [Date]. After reviewing the production, we find the response to be inadequate and the electronic search methodology to be insufficient under the governing rules of civil procedure.

Specifically, we have identified the following deficiencies:

1. Inadequate Document Production:

The current production fails to include documents responsive to [Request Nos.]. Notably, we believe the following categories of documents have been omitted: [List specific missing categories]. Furthermore, the documents were produced in a manner that is not organized as they are kept in the usual course of business.

2. Insufficient ESI Search Parameters:

The search terms and date ranges utilized for your ESI (Electronically Stored Information) collection appear overly restrictive. We propose the following adjustments to the search parameters to ensure all relevant communications are captured:

- **Additional Search Terms:** [List proposed terms]
- **Additional Custodians:** [List proposed custodians]
- **Revised Date Range:** [List start and end dates]

3. Missing Metadata:

The production was provided without essential metadata fields previously requested, including [List missing fields, e.g., Author, Date Created, BCC].

Please let me know your availability for a telephonic conference on [Date] or [Date] at [Time] to discuss these issues and reach a resolution without court intervention. We request that you provide a supplemental production or a written response addressing these deficiencies by [Deadline Date].

I look forward to hearing from you.

Sincerely,

[Your Signature]

[Your Printed Name]