

[Your Name/Law Firm]
[Your Address]
[Your Phone Number]
[Your Email]

[Date]

[Opposing Counsel Name]
[Opposing Law Firm]
[Address]

RE: Meet and Confer Regarding Inadequate Document Production - [Case Name/Case Number]

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the document production served by your office on [Date of Production] in response to [Plaintiff/Defendant]'s [First/Second] Request for Production of Documents.

Upon review, we have identified significant deficiencies that must be addressed to ensure compliance with [Federal Rule of Civil Procedure 34 / State Code Section]:

1. Inadequate Document Production: The production appears to be incomplete. Specifically, we have not received responsive documents regarding [Category 1, e.g., internal emails concerning project X] or [Category 2, e.g., financial ledgers for 2023]. Please confirm if these documents exist and when they will be produced.

2. Missing Metadata: The documents were produced in [Format, e.g., static PDF] without the required metadata. As per our [ESI Agreement / Initial Disclosures], all Electronically Stored Information (ESI) must be produced in native format or with accompanying load files including, but not limited to:

- Custodians
- Date Created / Date Sent
- Author / Recipient
- File Extension / File Name
- Hash Values

3. Improper Formatting: The current production lacks searchable text and does not maintain the parent-child relationship between emails and attachments. This makes the production unusable for the purposes of discovery.

Please let us know by [Date] when we can expect a supplemental production that corrects these issues and includes the missing metadata fields. We are available to discuss this on [Date/Time] if you believe a phone call would be more productive.

We hope to resolve this matter without the need for court intervention. However, if we do not receive a satisfactory response, we will be forced to seek a Motion to Compel.

Sincerely,

[Your Signature]

[Your Printed Name]