

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

[Date]

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

**Re: [Case Name], Case No. [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 dated [Date]. After reviewing the production, we find it to be inadequate and inconsistent with the requirements of [Applicable Rules of Civil Procedure].

Specifically, we have identified the following deficiencies:

**1. Inadequate Production and Missing Documents**

The production does not contain documents responsive to [Request Nos.]. Specifically, we believe the following categories of documents are missing: [List specific missing items]. Please confirm if these documents exist and when they will be produced.

**2. Improper Redactions**

We have noted extensive redactions in documents [List Bates Numbers]. These redactions appear to be improper because [State reason, e.g., the information is relevant and not protected by privilege]. Furthermore, you have failed to provide a corresponding privilege log explaining the legal basis for each redaction. We request that you provide unredacted versions or a detailed privilege log by [Date].

**3. Missing Metadata/Format Issues**

The documents were produced in a format that lacks [mention specific metadata or searchable text] as required by our ESI agreement. We request that these files be reproduced in the proper format.

We are available to discuss these issues via telephone on [Date] at [Time]. It is our hope to resolve these matters without the need for a Motion to Compel or court intervention. We look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]