

[Sender's Name]  
[Law Firm Name]  
[Address]  
[City, State, Zip Code]  
[Email]  
[Phone Number]

[Date]

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

**Re: Meet and Confer Regarding Inadequate Document Production**

**Case Name:** [Case Name]

**Case No.:** [Case Number]

Dear [Opposing Counsel Name],

I am writing pursuant to Federal Rule of Civil Procedure 37(a)(1) and Local Rule [Number] to meet and confer in good faith regarding your client's production of documents served on [Date] in response to [Plaintiff/Defendant]'s [First/Second] Request for Production of Documents.

After reviewing the production, we find it to be deficient for the following reasons:

- **Missing Responsive Documents:** Despite your client's objections and subsequent agreement to produce responsive materials, we have not received documents related to [Specific Request Numbers or Categories].
- **Improper Objections:** Your client has asserted "boilerplate" objections regarding [Vagueness/Overbreadth/Undue Burden] without stating whether any responsive documents are being withheld based on those objections as required by Rule 34(b)(2)(C).
- **Form of Production:** The documents were not produced [as kept in the usual course of business / in a reasonably usable form / with searchable metadata] as required by Rule 34(b)(2)(E).
- **Incomplete Privilege Log:** While documents have been withheld on the basis of privilege, you have failed to provide a privilege log that complies with Rule 26(b)(5).

We believe these issues can be resolved without court intervention. Please let us know by [Date/Time] when you are available for a telephone conference to discuss a timeline for a supplemental production.

If we are unable to reach an agreement regarding these deficiencies, we will have no choice but to seek the Court's assistance through a Motion to Compel under Rule 37.

I look forward to your prompt response.

Sincerely,

[Signature]

[Your Printed Name]