

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

Re: [Case Name and Court Case Number]

Subject: Meet and Confer Regarding Deficiencies in [Party Name]'s Document Production

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the document production served by your office on [Date] in response to [Moving Party]'s [Set Number] Request for Production of Documents.

Upon review, we have identified the following significant deficiencies that must be addressed:

1. Missing Attachments and Hyperlinked Documents

Several produced emails reference attachments or internal hyperlinks that were not included in the production. For example, [Reference Bates Numbers or Email Dates]. Please provide the missing attachments associated with these records immediately.

2. Incomplete Production

The production appears to be missing responsive documents related to [Specific Category of Documents, e.g., Financial Statements, Correspondence with X Person]. Specifically, [Explain why you believe documents are missing].

3. Improper Formatting or Metadata

The documents were produced in a format that [Explain issue, e.g., lacks searchable text, lacks original metadata, or is not in the agreed-upon ESI format].

We request that you supplement your production and provide the missing materials by [Date]. If we are unable to resolve these issues, we will be forced to seek the court's intervention via a Motion to Compel.

I am available to discuss this matter via telephone on [Date/Time] if you believe a conversation will expedite the resolution of these issues.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]