

SENT VIA EMAIL

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

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

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 have identified several significant deficiencies that must be addressed to avoid motion practice.

1. Inadequate Document Production

The current production is missing responsive documents related to [Request Numbers].

Specifically, we noted the following gaps:

- [Description of missing categories]
- [Description of missing date ranges]

2. Omission of Key Custodians

It appears that documents from the following key custodians were omitted from the search and production, despite their central role in the matters at issue:

- [Custodian Name 1]
- [Custodian Name 2]

We request that you supplement your production to include all responsive communications and files from these individuals immediately.

3. Technical Deficiencies

[Optional: Insert details regarding missing metadata, non-searchable PDFs, or lack of load files].

Please provide a timeline for the supplemental production of these materials by [Date]. If we do not receive a commitment to cure these deficiencies, we will be forced to seek the Court's intervention.

I am available to discuss this on [Date/Time] if you believe a call would be productive.

Sincerely,

[Your Name]

[Your Law Firm]