

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

[Date]

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

Re: [Case Name and Court Case Number]

Subject: Meet and Confer Regarding Deficiencies in Electronically Stored Information (ESI) Production

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the production of Electronically Stored Information (ESI) served by your office on [Date of Production] in response to [Plaintiff's/Defendant's] [Discovery Request Name]. Upon review, we have identified the following technical and substantive deficiencies:

1. Metadata Deficiencies: The production fails to include required metadata fields as previously agreed upon or as required by [Rule/ESI Protocol]. Specifically, fields such as [Insert specific fields, e.g., Date Sent, BCC, Author, Hash Values] are missing.

2. File Format and Load Files: The production was not delivered in [Native/Image] format as requested. Furthermore, the accompanying load files (.dat or .opt) are corrupt or improperly formatted, preventing successful ingestion into our review platform.

3. Text Searchability: Several documents, specifically [Reference Bates Ranges], were produced as non-searchable image files without corresponding OCR (Optical Character Recognition) text files.

4. Missing Attachments: We have identified parent emails (e.g., [Bates Number]) where the corresponding attachments are missing or have been detached in a manner that breaks the family relationship.

5. Threading and Deduplication: The production appears to contain excessive duplicates that were not suppressed, or conversely, entire email threads are missing from the production set.

We request that you remedy these deficiencies and provide a supplemental production by [Date]. Please let me know if you are available for a telephone conference on [Date] at [Time] to discuss these issues and ensure that future productions comply with the governing standards.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]