

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

[Date]

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

**Re: [Case Name and Court Case Number]**

**Subject: Meet and Confer Regarding Failure to Produce Subpoenaed Documents**

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve a discovery dispute regarding the deposition of [Witness Name] held on [Date].

As you are aware, the Subpoena Duces Tecum served on [Date] required the witness to produce the following categories of documents at the time of the deposition: [List Specific Categories or Attached Exhibit].

During the deposition, the witness failed to produce the requested documents. Specifically, [describe the deficiency, e.g., the witness produced no documents, or the witness failed to produce documents related to category X]. This failure to comply with the subpoena significantly hindered the ability to conduct a full and fair examination of the witness.

Please be advised that under [cite relevant Civil Procedure Code/Rule], a witness is required to produce all documents in their possession, custody, or control as specified in a valid subpoena. We request that you provide the missing documents no later than [Date].

If we do not receive the documents by the aforementioned date, we will be forced to seek judicial intervention, including but not limited to a Motion to Compel, a request for sanctions, and the re-opening of the deposition at your client's or the witness's expense.

I am available to discuss this matter further should you wish to resolve this without formal motion practice. I look forward to your prompt response.

Sincerely,

[Your Signature]  
[Your Printed Name]