

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

RE: [Case Name] / [Case Number] - Good Faith Meet and Confer Regarding Discovery Disputes

Dear [Counsel Name],

This letter serves as a formal request to meet and confer in a good faith effort to resolve discovery disputes prior to the filing of a motion to compel, pursuant to [Local Rule/Civil Procedure Rule].

Specifically, we have identified the following deficiencies in your responses to [Name of Discovery Request, e.g., Plaintiff's First Set of Interrogatories], served on [Date]:

- 1. [Discovery Request No. X]:** [Briefly describe the issue, e.g., The response consists only of boilerplate objections and fails to provide substantive information regarding...].
- 2. [Discovery Request No. Y]:** [Briefly describe the issue, e.g., Documents were withheld based on privilege, but no privilege log has been produced...].

Our position is that these items are relevant to the claims and defenses in this action and are proportional to the needs of the case because [Briefly state legal/factual reason].

We would like to resolve these matters without court intervention. Please let us know if you are available for a telephonic conference on [Date] at [Time] or [Date] at [Time] to discuss these issues.

If we are unable to reach a resolution or if I do not hear from you by [Date/Time], we will be forced to seek relief from the Court.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]