

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

[Date]

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

RE: Follow-Up Meet and Confer Regarding Third-Party Production Deficiencies

Case Name: [Case Name]

Case Number: [Case Number]

Dear [Opposing Counsel Name],

I am writing to follow up on our [Date of previous meeting/correspondence] meet and confer regarding the production of documents received from [Name of Third Party] in response to the subpoena dated [Date of Subpoena].

To date, the following deficiencies remain unresolved:

- **Missing Responsive Documents:** Despite the categories outlined in the subpoena, the production lacks [Specific missing categories or date ranges].
- **Incomplete Metadata:** The production was delivered without [Specific fields, e.g., Bates stamping, parent-child relationships, or OCR text], rendering the data non-searchable.
- **Redaction Issues:** Several documents contain excessive redactions for which no privilege log has been provided.
- **Technical Format:** The current format does not comply with the ESI protocol previously agreed upon on [Date].

As we discussed, these documents are critical to the upcoming [Deposition/Hearing/Deadline] scheduled for [Date]. Our position is that [Party Name] has a duty to ensure that the third-party production they are relying upon is complete and transparent.

Please let me know by [Date/Time] if you intend to supplement this production or provide a privilege log. If we are unable to resolve these issues, we will be forced to seek the Court's intervention through a Motion to Compel or a request for a discovery conference.

I am available for a brief call on [Date] at [Time] if you believe further verbal discussion would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]