

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

[Date]

SENT VIA [EMAIL/U.S. MAIL]

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

Re: [Case Name]
Case No.: [Case Number]
Subject: Meet and Confer Regarding Deficiencies in Expert Report of [Expert Name]

Dear [Opposing Counsel Name],

I am writing to meet and confer in good faith regarding the expert witness report of [Expert Name], which was served by your office on [Date]. Upon review, we find the report to be incomplete and non-compliant with [Insert Applicable Rule, e.g., Rule 26 of the FRCP].

Specifically, the report suffers from the following deficiencies:

- **Incomplete Opinions:** The report fails to provide a complete statement of all opinions the witness will express and the basis and reasons for them regarding [Specific Topic].
- **Missing Data/Exhibits:** The report references [Specific Documents or Data] but fails to include the data or other information considered by the witness in forming the opinions.
- **Qualification Issues:** The report does not include a complete list of the witness's qualifications, including a list of all publications authored in the previous 10 years.
- **Compensation:** The report lacks a statement of the compensation to be paid for the study and testimony in the case.
- **Prior Testimony:** The report fails to list any other cases in which the witness has testified as an expert at trial or by deposition within the preceding 4 years.

Pursuant to [Local Rule/Statute], please provide a supplemental report addressing these omissions by [Date]. If we do not receive a compliant report or a confirmed timeline for its production by that date, we will be forced to seek relief from the Court, including a motion to compel or a motion to preclude the expert's testimony.

I am available to discuss this matter further on [Date] at [Time]. Please let me know if you are available for a brief call to resolve these issues without judicial intervention.

Sincerely,

[Your Signature]

[Your Printed Name]