

[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] / [Case Number]

Subject: Meet and Confer Regarding Missing Expert Witness Testimony History

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the expert witness disclosure served by your office on [Date of Disclosure] for [Expert Witness Name].

Upon review of the disclosure and the attached materials, it appears that the production is incomplete. Specifically, the disclosure fails to include a complete list of all other cases in which the witness testified as an expert at trial or by deposition within the preceding four years, as required by [Insert Local/Federal Rule, e.g., FRCP 26(a)(2)(B)(v)].

The current disclosure [is missing the list entirely / only provides a partial list / contains insufficient detail]. Without this history, we are unable to properly prepare for the expert's deposition or evaluate the witness's qualifications and prior testimony.

Please provide a supplemental disclosure containing the following information for each case within the last four years:

- The name of the case;
- The court and case number;
- The nature of the testimony (deposition or trial); and
- The date of the testimony.

We request that you provide this information by [Date]. If we do not receive the missing testimony history by this time, 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 via telephone on [Date/Time] if you believe a conversation would expedite the resolution of this issue.

Sincerely,

[Your Signature]

[Your Printed Name]