

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

[Date]

VIA [METHOD OF DELIVERY: E-MAIL / 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 Untimely Expert Witness Disclosure

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the deficiencies in [Party Name]'s Expert Witness Disclosure, which was received by our office on [Date Received].

Pursuant to [State/Federal Rule of Civil Procedure, e.g., FRCP 26(a)(2) or Local Rule], the deadline for the exchange of expert witness information was [Scheduled Deadline Date]. Your disclosure was served on [Actual Date Served], making it [Number] days late.

In addition to the untimeliness of the disclosure, the following deficiencies were noted:

- [Specify Deficiency 1: e.g., Failure to provide a written report signed by the witness]
- [Specify Deficiency 2: e.g., Failure to provide a list of other cases in which the witness testified]
- [Specify Deficiency 3: e.g., Inadequate statement of the compensation to be paid]

The untimeliness of this disclosure has caused significant prejudice to my client by [explain briefly, e.g., shortening the time available for rebuttal expert preparation or deposition scheduling].

I am available to discuss this matter on [Date] at [Time]. My goal is to resolve this issue without the need for a formal motion to strike or a motion for sanctions. Please let me know if you are willing to [Proposed Remedy: e.g., stipulate to an extension of my client's rebuttal deadline / withdraw the witness].

If we do not receive a response or a commitment to cure these deficiencies by [Date/Time], we will be left with no choice but to seek judicial intervention and request appropriate sanctions, including the exclusion of the expert's testimony.

I look forward to hearing from you soon.

Sincerely,

[Your Signature]

[Your Printed Name]