

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

[Date]

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

RE: [Case Name] / [Case Number]
MEET AND CONFER REGARDING DEFICIENT EXPERT RELIANCE MATERIALS

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer regarding the production of materials relied upon by your designated expert witness, [Expert Name].

Upon reviewing the production dated [Date], we have identified the following deficiencies:

- **Missing Case Files:** The production does not include [specific documents, e.g., raw data, testing notes, or draft reports] referenced in the expert's report.
- **Literature and Authorities:** [Expert Name] cites [specific study or publication] as a primary basis for their opinion; however, a copy of this material was not provided.
- **Correspondence:** We have not received copies of communications between your office and the expert regarding the facts and data considered in forming the opinions.
- **Financial Disclosures:** The production is missing a current fee schedule or compensation statement for the expert's work on this matter.

Pursuant to [Insert Local Rule or Federal Rule of Civil Procedure, e.g., Rule 26(a)(2)(B)], a testifying expert must disclose all data or other information considered by the witness in forming their opinions. Failure to provide these materials prejudices our ability to prepare for the upcoming deposition scheduled for [Deposition Date].

Please provide the missing materials identified above by no later than [Date/Time]. If we do not receive these materials or a definitive timeline for their production by that time, we will be forced to seek the Court's intervention, including a request for a protective order or a motion to compel and/or exclude the expert's testimony.

I am available on [Date] at [Time] should you wish to discuss this matter via telephone.

Sincerely,

[Your Signature]

[Your Printed Name]