

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

[Date]

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

Re: [Case Name]
Case No.: [Court Case Number]
Subject: Meet and Confer Regarding Deficient Expert Witness Disclosures

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding your [Date] Expert Witness Designation and Disclosure. Upon review, your disclosure regarding [Expert Name] is procedurally and substantively deficient under [Insert Local Rule or Code of Civil Procedure Section].

Specifically, your description of the scope of testimony for [Expert Name] is impermissibly vague. You state that the expert will testify regarding "[Insert Vague Quote, e.g., 'all issues related to liability and causation']". This generalized statement fails to provide the required "brief narrative statement of the qualifications" and "sufficiently detailed description of the matters on which the expert is expected to testify."

As it stands, we are unable to adequately prepare for a deposition or understand the specific opinions this expert intends to offer at trial. To avoid the necessity of a motion to compel or a motion to preclude expert testimony, we request that you provide a supplemental disclosure by [Date] that includes:

- A specific list of the opinions the expert has formed.
- The factual basis and data relied upon for each opinion.
- A clear definition of the technical or professional areas the testimony will cover.

Please let me know by [Time] on [Date] if you intend to supplement this disclosure or if you would like to schedule a call to discuss this further. It is my hope that we can resolve this matter without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]