

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

[Date]

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

RE: [Case Name]; Case No. [Case Number]
Subject: Meet and Confer Regarding Deficient Non-Retained Expert Disclosures

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the non-retained expert witness disclosures served by your office on [Date]. Upon review, we find the disclosures for the following witnesses to be deficient under [Cite Applicable Civil Procedure Rule, e.g., Rule 26(a)(2)(C)]:

- [Name of Witness 1]
- [Name of Witness 2]
- [Name of Witness 3]

Specifically, the disclosures fail to provide sufficient detail regarding:

1. The specific subject matter on which the witness is expected to present evidence.
2. A summary of the actual facts and opinions to which the witness is expected to testify.

The current descriptions are overly broad and do not allow us to adequately prepare for depositions or trial. For example, [Detail a specific deficiency, e.g., the disclosure for Dr. Smith merely states he will testify regarding "medical treatment" without specifying the causation or prognosis opinions held].

Please provide supplemental disclosures that comply with the requirements of [Cite Rule] by [Date/Time]. If we do not receive adequate supplements by that time, we will be forced to seek relief from the Court, including a motion to preclude these witnesses from testifying.

I am available to discuss this further on [Date] at [Time] if you believe a telephonic conference would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]