

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

[Date]

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

RE: [Case Name / Case Number]

Subject: Meet and Confer Regarding Deficiencies in Rebuttal Expert Witness Disclosures

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the Rebuttal Expert Witness Disclosures served by your office on [Date]. Upon review, we have identified several deficiencies that fail to comply with [cite applicable Code of Civil Procedure or Federal Rule of Civil Procedure].

Specifically, the disclosures are deficient for the following reasons:

- **Improper Rebuttal Scope:** The opinions disclosed for [Expert Name] do not "rebut" the testimony of our initial experts, but instead attempt to introduce new case-in-chief theories that should have been disclosed during the initial exchange.
- **Insufficient Information:** The disclosure fails to provide a complete statement of all opinions, the basis and reasons for those opinions, or the data considered by the witness.
- **Missing Documentation:** The disclosure did not include the expert's current CV, a list of publications, or a list of previous cases in which the expert has testified.
- **Failure to Produce Report:** No written report was provided as required by [Rule Number].

To avoid the necessity of filing a Motion to Strike or a Motion to Compel, we request that you provide supplemental disclosures that address these deficiencies by [Date/Time].

Please let me know by the end of business tomorrow if you are available for a brief call to discuss this matter further, or if you intend to provide the supplemental information by the date requested above.

Sincerely,

[Your Signature]
[Your Printed Name]