

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

[Date]

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

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

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding your "Expert Witness Designation" served on [Date]. Upon review, we have identified the following deficiencies that fail to comply with [Cite Local/State/Federal Code of Civil Procedure Section]:

- 1. Failure to Provide Narrative Statement:** Your designation for [Expert Name] does not include a brief narrative statement of the qualifications of the expert or the general substance of the testimony that the expert is expected to give.
- 2. Incomplete Expert Declaration:** The declaration provided for [Expert Name] fails to state that the expert has agreed to testify at trial and is prepared to give a meaningful oral deposition concerning their specific testimony and fees.
- 3. Failure to Produce Reports/CV:** You have failed to produce the current Curriculum Vitae and/or the expert report for [Expert Name] as required by [Cite Rule].
- 4. Improper Non-Retained Designation:** You have listed [Expert Name] as a non-retained expert; however, the anticipated testimony appears to fall within the scope of a retained expert, requiring a full declaration and report.

Please provide a supplemental expert designation that corrects these deficiencies no later than [Date]. If we do not receive a compliant disclosure by that time, we will be forced to file a motion to compel or a motion in limine to exclude this expert testimony at trial.

I am available to discuss this matter via telephone on [Date/Time] if you believe a conversation would resolve these issues without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]