

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

**Re: [Case Name] / [Case Number]**

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the Expert Witness Disclosure served by your office on [Date]. Upon review of the production, it appears that the disclosure for [Expert Name] is deficient under [State/Federal] Rule of Civil Procedure [Rule Number].

Specifically, the following required information is missing:

- **Qualifications:** The disclosure does not include a complete statement of the expert's qualifications, including a list of all publications authored in the previous 10 years.
- **Prior Testimony:** The disclosure fails to provide a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition.

To avoid the necessity of filing a Motion to Compel or a motion to preclude this expert's testimony, please provide the missing curriculum vitae and testimony history by [Date/Time].

I am available to discuss this matter via telephone on [Date] at [Time] if you believe a conference is necessary to resolve this issue.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]