

[Your Name/Law Firm Name]

[Address]

[City, State, Zip Code]

[Phone Number]

[Email]

[Date]

[Opposing Counsel Name]

[Opposing Law Firm]

[Address]

[City, State, Zip Code]

Re: [Case Name]

Case No.: [Case Number]

Subject: Meet and Confer Regarding Deficient Expert Witness Designations

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the Expert Witness Designation served by your office on [Date]. Upon review, we find that the description of the subject matter for the following expert(s) is overbroad and fails to comply with [Cite Local Rule or Code of Civil Procedure, e.g., CCP § 2034.260]:

Expert(s) at Issue: [List Expert Names]

Deficiency:

The current designation states that the expert will testify on "[Quote the overbroad language, e.g., all issues related to liability and damages]." This catch-all description is impermissibly broad. It fails to provide sufficient notice of the specific technical or specialized areas the expert intends to address, thereby preventing our office from adequately preparing for deposition or rebuttal.

Request:

Please provide a supplemental designation for each expert listed above that specifically identifies the discrete subjects upon which the expert is expected to testify. We request this clarification no later than [Date].

Our goal is to avoid unnecessary discovery motions. However, if we cannot reach an agreement to narrow these subject areas, we will be forced to seek a protective order or a motion to compel further responses.

I am available to discuss this further via telephone on [Date] at [Time]. Please let me know if that works for your schedule.

Sincerely,

[Your Signature]

[Your Printed Name]