

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

[Date]

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

Re: [Case Name] / [Case Number]

**Subject: MEET AND CONFER REGARDING DEFENDANT'S INADEQUATE
DISCOVERY RESPONSES**

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to resolve discovery disputes regarding [Party Name]'s responses to our [First/Second] Set of Interrogatories and Requests for Production, served on [Date]. To date, your responses remain incomplete, and the production of documents is significantly delayed.

Inadequate Interrogatory Responses

Specifically, we find the following responses to be deficient:

- **Interrogatory No. [X]:** Your response consists of boilerplate objections regarding overbreadth and relevance. This information is central to [legal issue] and must be answered.
- **Interrogatory No. [Y]:** The response provided is evasive and fails to identify the specific individuals with knowledge of the facts requested.

Delays in Production of Documents

Furthermore, while your written responses were served on [Date], you have failed to produce the responsive documents for Requests No. [X] through [Y]. Despite previous assurances that the production was forthcoming, we have yet to receive the materials.

Request for Supplementation

Please consider this letter a formal request to meet and confer pursuant to [State/Federal Rule of Civil Procedure]. We request that you provide verified, supplemental responses and the outstanding document production by [Date/Time].

If we do not receive the supplemental materials or a definitive timeline for compliance by the aforementioned date, we will have no choice but to seek the Court's intervention by filing a Motion to Compel and seeking associated sanctions.

I am available to discuss these matters via telephone on [Date] at [Time] if you believe a conversation would expedite this process.

Sincerely,

[Your Signature]

[Your Printed Name]