

[Your Name]  
[Your Law Firm/Company]  
[Your Address]  
[Your Phone Number]  
[Your Email]

[Date]

[Opposing Counsel Name]  
[Opposing Law Firm]  
[Opposing Counsel Address]

**Re: [Case Name and Case Number] - Meet and Confer Regarding Discovery Deficiencies**

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to resolve outstanding discovery issues prior to seeking court intervention. To date, your responses to [identify specific discovery requests, e.g., Plaintiff's First Set of Requests for Production] remain incomplete, and the production of documents is significantly delayed.

Specifically, the following deficiencies must be addressed:

- **Missing Documents:** We have not received documents responsive to Request Nos. [List numbers]. Despite your initial response, these items were omitted from the production set provided on [Date].
- **Incomplete Production:** Regarding Request No. [Number], the documents provided appear to be redacted or incomplete. [Briefly describe what is missing].
- **Expired Deadlines:** Your responses were originally due on [Date]. Although we granted an extension until [Date], we have yet to receive the remaining materials.

The missing information is critical to our ability to [state reason, e.g., prepare for upcoming depositions or meet expert witness deadlines]. We have been patient regarding these delays; however, the current timeline is no longer sustainable.

Please provide the missing documents and supplemental responses by [Date/Time]. If we do not receive the production by this date, we will have no choice but to file a Motion to Compel discovery and seek appropriate sanctions.

I am available to discuss this matter on [Date] at [Time] if you believe a telephonic conference would help expedite the resolution of these issues. Please let me know if that time works for you.

Sincerely,

[Your Signature]  
[Your Printed Name]