

SENT VIA EMAIL AND U.S. MAIL

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

Re: [Case Name and Docket Number]
Rule 37 Good Faith Meet and Confer Regarding Discovery Deficiencies

Dear [Opposing Counsel Name],

I am writing to you in a good faith effort to resolve outstanding discovery issues pursuant to Federal Rule of Civil Procedure 37(a)(1) [or applicable Local Rule]. To date, your production remains incomplete, and several responses are overdue.

Specifically, the following items remain outstanding:

- **Interrogatories:** Your responses to Interrogatory Nos. [Numbers] are incomplete or contain boilerplate objections that waive the required specificity.
- **Requests for Production (RFP):** Despite your initial response on [Date], you have failed to produce documents responsive to RFP Nos. [Numbers].
- **Missing Categories:** Specifically, we have not received [Describe specific missing records, e.g., email archives, financial statements, or personnel files].

The original deadline for these materials was [Original Deadline Date]. While we have attempted to be reasonable regarding extensions, the current delay is now prejudicing my client's ability to prepare for depositions and meet upcoming court deadlines.

Please provide the missing documents and supplemental responses by [Date]. If we do not receive these materials or a definitive production schedule by that time, we will be forced to seek the Court's intervention by filing a Motion to Compel.

I am available to discuss this via telephone on [Date] at [Time] if you believe a conference will resolve these issues without motion practice. Please let me know if that time works for you.

Sincerely,

[Your Name]
[Your Law Firm]
[Your Phone Number]
[Your Email]