

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

[Date]

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

Re: [Case Name] / [Case Number]

Subject: Good Faith Meet and Confer Regarding Deficient Responses to Requests for Admission and Untimely Production

Dear [Opposing Counsel Name],

I am writing in a good faith effort to resolve discovery disputes regarding [Party Name]'s recent discovery responses served on [Date]. Specifically, we find the responses to our First Set of Requests for Admission (RFA) to be deficient and the production of documents to be untimely and incomplete.

I. Deficient Requests for Admission

Upon review, several of your responses do not comply with [Applicable State/Federal Rule of Civil Procedure]. Specifically:

- **RFA Nos. [Numbers]:** Your responses consist of boilerplate objections and do not provide a clear admission or denial.
- **RFA Nos. [Numbers]:** You have claimed an inability to admit or deny without stating that a reasonable inquiry has been made or that the information known or readily obtainable is insufficient to enable an admission.

II. Untimely and Incomplete Production

Pursuant to our Request for Production of Documents served on [Date], the responsive materials were due on [Due Date]. To date, we have received [description of what was received, or "nothing"]. The following categories remain outstanding:

- [Description of missing document category]
- [Description of missing document category]

The failure to produce these documents in a timely manner hinders our ability to [prepare for depositions/meet court deadlines].

III. Proposed Resolution

We request that you provide supplemental responses to the RFAs and produce the outstanding documents by [Date]. If we do not receive these materials or a definitive timeline for their delivery by that time, we will be forced to seek the Court's intervention through a Motion to Compel and/or a request for sanctions.

I am available to discuss these matters via telephone on [Date] at [Time] if you believe a conversation would expedite the resolution of these issues.

Sincerely,

[Your Signature]

[Your Printed Name]