

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

[Date]

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

Re: [Case Name] / [Case Number] - Good Faith Meet and Confer Regarding Discovery Deficiencies

Dear [Opposing Counsel Name],

This letter serves as a formal good faith effort to resolve outstanding discovery disputes pursuant to [Local Rule/State Rule, e.g., Rule 37] prior to the filing of a Motion to Compel.

To date, [Party Name]'s responses to our [First/Second] Set of Interrogatories and Requests for Production remain deficient. Specifically, we note the following issues:

1. Electronic Production Delays

Despite previous assurances, the production of Electronically Stored Information (ESI) is significantly overdue. The agreed-upon deadline of [Date] has passed, and we have not received the [Specific ESI, e.g., email archives/database exports]. Further delays are hindering our ability to prepare for upcoming depositions and meet court-mandated deadlines.

2. Deficient Responses to Requests for Production

The following requests remain unsatisfied:

- **Request No. [X]:** [Briefly describe missing documents].
- **Request No. [Y]:** [Briefly describe missing documents].

3. Improper Objections

Several of your responses rely on boilerplate objections (e.g., "overly broad" or "unduly burdensome") without providing the specific factual basis required by law. Please provide supplemental responses that address the substance of these requests.

We are committed to resolving these matters without judicial intervention. However, if we do not receive the outstanding ESI and supplemental responses by [Date/Time], we will have no choice but to seek an order from the Court to compel production and request appropriate sanctions.

Please let us know by [Date] if you are available for a brief call to discuss a final production schedule.

Sincerely,

[Your Signature]

[Your Printed Name]