

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

[Date]

VIA [Email/U.S. Mail]

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

Re: [Case Name], Case No. [Case Number]
Subject: Meet and Confer Regarding ESI Production Delays and Discovery Deficiencies

Dear [Counsel Name]:

I am writing in good faith to address outstanding issues regarding [Party Name]'s discovery responses and the production of Electronically Stored Information (ESI). To date, your client's participation in the discovery process remains incomplete and procedurally deficient.

I. Delays in ESI Production

Despite the deadlines set forth in the [Scheduling Order/Rule 34], the following ESI remains outstanding:

- [Description of missing ESI, e.g., Email archives for Key Custodians]
- [Description of missing ESI, e.g., Native format Excel spreadsheets]
- [Description of missing ESI, e.g., Metadata logs]

The continued delay in producing these materials is prejudicial to our ability to prepare for depositions and upcoming motion deadlines.

II. Substantive Discovery Deficiencies

In addition to the production delays, your written responses dated [Date] are substantively deficient for the following reasons:

- **Interrogatory No. [X]:** Your response is evasive and fails to provide [specific missing information].
- **Request for Production No. [Y]:** You have asserted boilerplate objections without specifying whether responsive documents are being withheld.

- **Privilege Log:** The log provided lacks sufficient detail to evaluate the claims of privilege for [specific entries or categories].

III. Proposed Resolution

We request that you provide the missing ESI and supplemental responses by [Date]. Please let us know by [Time/Date] if you are available for a brief meet-and-confer call to resolve these matters without court intervention.

If we do not receive the outstanding discovery or a firm commitment to a production schedule by the aforementioned date, we will have no choice but to seek relief from the Court, including a Motion to Compel and a request for sanctions.

Sincerely,

[Your Signature]

[Your Printed Name]
Counsel for [Plaintiff/Defendant]