

[Sender's Name]
[Sender's Law Firm/Company]
[Address]
[City, State, Zip Code]
[Email Address]
[Phone Number]

[Date]

[Recipient's Name]
[Recipient's Law Firm]
[Address]
[City, State, Zip Code]

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

Dear [Recipient's Name],

I am writing this letter in a good faith effort to resolve outstanding discovery issues regarding [Party Name]'s Responses to [Moving Party]'s [First/Second] Set of Interrogatories and Requests for Production of Documents, originally served on [Date].

Document Production Delays

To date, we have not received the documents requested in Request Nos. [List Numbers]. While your previous correspondence dated [Date] indicated that production was forthcoming, the deadline has passed. Please provide a firm date by which all responsive documents will be produced. If certain documents do not exist, please provide a formal statement to that effect.

Interrogatory Deficiencies

Furthermore, we find the following responses to our Interrogatories to be deficient:

- **Interrogatory No. [X]:** Your response is [incomplete/vague/evasive]. We requested [Specific Information], but the response provided only [Describe Deficiency]. Please supplement this response with specific facts.
- **Interrogatory No. [Y]:** You have asserted an objection based on [Privilege/Overbreadth/etc.]. We believe this objection is misplaced because [Reason why objection is invalid]. We request a full narrative response.

Proposed Resolution

Our goal is to resolve these matters without the need for court intervention. We request that you provide the missing documents and supplemental interrogatory responses by [Date].

If we do not receive the supplemental production or a reasonable timeline for compliance by the aforementioned date, we will have no choice but to seek a Discovery Conference with the Court or file a Motion to Compel.

I am available to discuss these issues via telephone on [Date] at [Time]. Please let me know if that works for your schedule.

Sincerely,

[Signature]
[Typed Name]