

[Sender Name]  
[Sender Law Firm/Company]  
[Address]  
[City, State, Zip Code]

[Date]

[Recipient Name]  
[Recipient Law Firm/Company]  
[Address]  
[City, State, Zip Code]

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

Dear [Recipient Name],

I am writing in a good faith effort to resolve ongoing discovery disputes pursuant to [Insert Local Rule or Statute, e.g., Rule 37 of the Federal Rules of Civil Procedure].

**Deficient Document Productions**

Upon review of your production dated [Date], we have identified the following deficiencies:

- **Missing Responsive Documents:** Specifically regarding Request Nos. [Numbers], your production failed to include [Description of missing documents].
- **Incomplete Data/Redactions:** Documents produced at [Bates Range] contain improper redactions that obscure non-privileged information relevant to [Issue].
- **Format Issues:** The production was not delivered in the agreed-upon [Native/Searchable PDF] format, rendering the metadata inaccessible.

**Scheduling Delays**

Furthermore, we are concerned regarding the repeated delays in the discovery schedule. To date, we have not received dates for the depositions of [Witness Names], despite our initial request on [Date]. Additionally, the responses to our [Second/Third] Set of Interrogatories are now [Number] days overdue.

**Proposed Resolution**

To avoid the necessity of court intervention, we request the following:

1. A supplemental production addressing the deficiencies noted above by [Date].
2. A definitive schedule for the outstanding depositions by the close of business on [Date].
3. A "meet and confer" conference call on [Date] at [Time] to discuss any remaining obstacles.

We hope to resolve these matters amicably. However, if we do not receive the outstanding discovery or a commitment to a reasonable production schedule by [Deadline], we will be left with no choice but to seek relief from the Court.

Sincerely,

[Your Signature]

[Your Printed Name]