

SENT VIA EMAIL AND U.S. MAIL

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

Re: [Case Name]; Case No. [Case Number]
Subject: FINAL GOOD FAITH LETTER REGARDING UNCURED DISCOVERY DEFICIENCIES

Dear [Opposing Counsel Name],

This letter serves as a final good faith attempt to resolve the outstanding discovery deficiencies in the above-referenced matter prior to [Party Name] seeking judicial intervention through a Motion to Compel and/or Request for Sanctions.

To date, the following discovery issues remain unresolved despite prior correspondence dated [List Dates of Previous Letters/Emails]:

- **Overdue Responses:** [Specify Requests, e.g., Interrogatories, Set One] were due on [Original Due Date] and remain outstanding.
- **Incomplete Production:** Your production on [Date] failed to include documents responsive to [Specify Request Numbers].
- **Unjustified Objections:** Your boilerplate objections to [Specify Request Numbers] are improper under [Cite Local Rule/Statute].
- **Prolonged Delays:** Despite your previous assurances on [Date] that production would be completed by [Date], we have received no further documents.

We have attempted to be reasonable regarding extensions; however, the continued delay is now significantly prejudicing our ability to meet the court's scheduling deadlines and prepare for [Depositions/Trial].

Please provide the missing responses and/or the complete document production no later than [Insert Date and Time]. If we do not receive the materials by this deadline, we will have no choice but to file a Motion to Compel without further notice. We will also seek an award of reasonable attorney's fees and costs incurred in bringing such a motion.

I look forward to your immediate compliance to avoid the necessity of court involvement.

Sincerely,

[Your Name]
[Your Law Firm]

[Your Phone Number]

[Your Email]

cc: [Client Name/Co-Counsel]