

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

[Date]

VIA [E-MAIL/U.S. MAIL]

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

Re: [Case Name] / [Case Number]

Subject: SUPPLEMENTAL GOOD FAITH LETTER REGARDING OUTSTANDING DISCOVERY AND PRODUCTION DELAYS

Dear [Opposing Counsel Name],

I am writing this supplemental letter following our previous correspondence dated [Date of previous letter] and our meet-and-confer session on [Date of meeting] regarding [Plaintiff/Defendant]'s outstanding discovery responses and document production.

To date, the following deficiencies remain unresolved:

- 1. Overdue Document Production:** Despite your previous assurances that documents would be produced by [Agreed Date], we have yet to receive [specify missing items, e.g., electronically stored information (ESI), bank statements, or personnel files].
- 2. Incomplete Responses to Interrogatories:** Your responses to Interrogatory Nos. [Numbers] remain incomplete. Specifically, [describe the deficiency, e.g., the failure to identify witnesses or provide specific dates].
- 3. Improper Objections:** We maintain that the boilerplate objections regarding [Relevance/Privilege/Burdensomeness] asserted in response to [Request Nos.] are improper and lack the specificity required under [State/Federal] Rule of Civil Procedure [Rule Number].
- 4. Privilege Log:** We have yet to receive a privilege log for those documents withheld from production, as required by [Rule Number].

We have attempted to resolve these matters in good faith without court intervention. However, the current delays are impacting our ability to prepare for [upcoming depositions/expert deadlines/trial].

Please provide the missing discovery and a formal response to the issues raised above by [Deadline Date/Time]. If we do not receive the production or a meaningful commitment to a production schedule by that time, we will have no choice but to seek the Court's assistance by filing a Motion to Compel.

I look forward to your prompt response and to resolving these issues amicably.

Sincerely,

[Your Signature]

[Your Printed Name]