

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

[Date]

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

**Re: [Case Name/Case Number] - Good Faith Conferral Regarding Discovery Deficiencies**

Dear [Counsel Name],

This letter serves as a formal good faith effort to resolve discovery disputes pursuant to [Insert Applicable Local/State/Federal Rule, e.g., Rule 37]. We are sending this in hopes of avoiding the necessity of filing a Motion to Compel with the Court.

As of this date, your client's responses to [Insert Specific Discovery Set, e.g., Plaintiff's First Set of Interrogatories and Requests for Production] remain deficient for the following reasons:

- **[Item 1]:** [Explain the deficiency, e.g., No response provided to Interrogatory No. 5].
- **[Item 2]:** [Explain the deficiency, e.g., Improper boilerplate objections used for Request for Production No. 12].
- **[Item 3]:** [Explain the deficiency, e.g., Documents promised on (Date) have not yet been produced].

We believe these requests seek information that is relevant and proportional to the needs of this case. We request that you provide supplemental responses and the missing documentation by [Insert Date/Time].

Please let us know if you are available for a brief telephonic conference on [Insert Date] at [Insert Time] to discuss these matters further. If we do not receive the requested discovery or hear from you by the deadline stated above, we will have no choice but to seek the Court's intervention by filing a Motion to Compel.

We look forward to resolving this matter amicably.

Sincerely,

[Your Signature]  
[Your Printed Name]