

[Your Name/Law Firm]
[Your 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 No: [Case Number]
Subject: Meet and Confer Regarding Discovery Deficiencies

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer effort regarding your client's responses to [Name of Discovery Set, e.g., Plaintiff's First Set of Interrogatories], which were served on [Date]. Upon review, we find the responses to be deficient for the following reasons:

1. Interrogatory/Request No. [Number]:

[Describe deficiency, e.g., The response is evasive, contains boilerplate objections, or fails to provide specific dates requested.]

2. Interrogatory/Request No. [Number]:

[Describe deficiency, e.g., Your client has failed to produce the documents identified in the response or has claimed privilege without providing a privilege log.]

3. General Objections:

[Address general objections that hinder the discovery process.]

We request that you provide supplemental responses and/or the missing production by [Date]. We are available to discuss these issues via telephone on [Date/Time] if you believe a conversation will help resolve these matters without court intervention.

Please be advised that if we do not receive adequate supplemental responses or reach an agreement by the aforementioned date, we will be forced to file a Motion to Compel.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]