

[Your Name]  
[Your Address]  
[Your Email]  
[Your Phone Number]

[Date]

[Opposing Counsel Name]  
[Opposing Law Firm]  
[Opposing Counsel Address]

**RE: Meet and Confer Regarding Discovery Deficiencies - [Case Name / Case Number]**

Dear [Opposing Counsel Name],

I am writing to you in a good faith effort to resolve discovery disputes prior to the filing of a Motion to Compel, pursuant to [State Local Rule/Federal Rule of Civil Procedure 37].

To date, we have not received sufficient responses to the following requests served on [Date]:

- **Request for Production No. [Number]:** [Briefly describe the missing or incomplete documents].
- **Interrogatory No. [Number]:** [Briefly describe why the answer is evasive or incomplete].
- **Request for Admission No. [Number]:** [Briefly describe the issue].

Specifically, your objections based on [mention objection, e.g., overbreadth or privilege] are unsupported because [briefly state legal reason].

Please provide the outstanding discovery or supplemental responses by [Date/Time]. If we cannot resolve these issues by that time, I will be forced to seek the Court's intervention and request an award of attorney's fees and costs incurred in bringing the motion.

I am available to discuss this matter via telephone on [Date] at [Time] if you believe a verbal conference would facilitate a resolution.

Sincerely,

[Your Signature]

[Your Printed Name]