

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

[Date]

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

**RE: [Case Name] / [Case Number]**  
**SUBJECT: MEET AND CONFER REGARDING DEFICIENT DISCOVERY**  
**RESPONSES**

Dear [Opposing Counsel Name],

This letter serves as a formal "meet and confer" effort to resolve discovery disputes in good faith prior to the filing of a Motion to Compel, pursuant to [State/Federal Local Rule].

On [Date], we served our [First/Second] Set of [Interrogatories/Requests for Production] upon your client. We received your responses on [Date]. Upon review, we find the following responses to be deficient for the reasons set forth below:

- 1. [Request Number]:** [Briefly state why the response is deficient, e.g., "The response contains boilerplate objections and fails to produce any documents."]
- 2. [Request Number]:** [Briefly state why the response is deficient, e.g., "The answer provided is non-responsive and evasive."]

We believe these requests are relevant to the subject matter of this litigation and are reasonably calculated to lead to the discovery of admissible evidence. We request that you provide supplemental responses and/or the requested documents without further objection by [Date/Time].

It is our hope to resolve this matter without court intervention. However, if we do not receive supplemental responses or a meaningful commitment to produce the requested information by the deadline stated above, we will have no choice but to file a Motion to Compel and seek all available sanctions and fees.

Please contact me at [Phone Number] if you wish to discuss this matter further over the phone.

Sincerely,

[Your Signature]

[Your Printed Name]