

**SENT VIA EMAIL / FIRST CLASS MAIL**

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

**Re: [Case Name and Case Number]**

**Subject: Rule 37 Good Faith Conferral Regarding Discovery Deficiencies**

Dear [Counsel Name],

This letter serves as a formal "good faith conferral" pursuant to Federal Rule of Civil Procedure 37(a)(1) [or applicable Local Rule] regarding the outstanding discovery issues in the above-referenced matter.

Specifically, we are writing to address the following deficiencies in your [Discovery Request Type, e.g., First Set of Interrogatories/Requests for Production] served on [Date]:

1. **[Request No. X]:** [Briefly describe the issue, e.g., You provided a boilerplate objection regarding relevance; however, the documents are central to our claim regarding...]
2. **[Request No. Y]:** [Briefly describe the issue, e.g., No documents were produced despite your statement that you would comply...]
3. **[Request No. Z]:** [Briefly describe the issue, e.g., The privilege log provided lacks sufficient detail to evaluate the claims...]

Our goal is to resolve these discovery disputes without the need for court intervention. We request that you provide supplemental responses and/or produce the requested materials by [Date].

Please let us know if you are available for a brief telephonic conference on [Date] at [Time] to discuss these matters. If we are unable to resolve these issues or reach an agreement by [Date], we will be left with no choice but to seek the court's assistance through a Motion to Compel.

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

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email Address]