

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

[Date]

Sent via Email and First Class Mail

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

Re: [Case Name and Court Docket Number]
Subject: Good Faith Attempt to Confer Regarding Pending Motion to Compel

Dear [Opposing Counsel Name],

I am writing this letter in a final good faith effort to resolve our ongoing discovery dispute regarding [describe specific discovery requests, e.g., Plaintiff's First Set of Interrogatories and Requests for Production] served on [Date].

To date, we have not received [complete responses/responsive documents/adequate answers] despite our previous correspondence dated [List dates of previous emails or letters]. Specifically, the following items remain outstanding:

- [Item 1: e.g., Response to Interrogatory No. 5]
- [Item 2: e.g., Production of financial records for 2023]
- [Item 3: e.g., Clarification on privilege log entries]

Pursuant to [Cite local court rule, e.g., Rule 37], we are required to confer with you before seeking court intervention. We would prefer to resolve these issues without the need for a formal Motion to Compel.

Please let me know by [Time] on [Date] if you are available for a brief telephone call to discuss a timeline for production. If we do not receive the outstanding discovery or a definitive commitment to produce it by [Date], we will proceed with filing a Motion to Compel Discovery and will seek any available sanctions or costs associated with the motion.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]