

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

[Date]

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

Re: [Case Name] / Case No: [Case Number]
Subject: Meet and Confer Regarding Discovery Deficiencies

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to resolve discovery disputes regarding [Plaintiff/Defendant]'s responses to [Insert specific discovery request, e.g., First Set of Interrogatories], which were served on [Date].

After reviewing the responses, we have identified the following deficiencies:

- 1. Interrogatory No. [X]:** [Explain why the response is insufficient, e.g., the response is evasive, or the objection based on privilege is not supported by a privilege log.]
- 2. Request for Production No. [Y]:** [Explain the deficiency, e.g., no documents were produced despite the statement that documents would be forthcoming, or the scope of the search was overly restrictive.]
- 3. General Objections:** [Address any boilerplate objections that hinder the discovery process.]

The information requested is relevant to the claims and defenses in this matter and is proportional to the needs of the case. We request that you provide supplemental responses and the missing production by [Insert Date].

Please let me know if you would like to schedule a call to discuss these issues further. It is our hope to resolve these matters without the need for court intervention via a Motion to Compel.

I look forward to hearing from you soon.

Sincerely,

[Your Signature]

[Your Printed Name]