

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

[Date]

[Recipient Name]  
[Recipient Law Firm]  
[Address]  
[City, State, Zip Code]

**RE: [Case Name / Case Number] - Rule 37 Pre-Filing Conferral Regarding Discovery Disputes**

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number/Federal Rule of Civil Procedure 37], this letter serves as a formal request to meet and confer regarding the outstanding discovery issues in the above-referenced matter. We are sending this in a good faith effort to resolve these disputes without court intervention.

Specifically, the following responses to [Name of Discovery Request, e.g., Plaintiff's First Set of Interrogatories] dated [Date] remain deficient:

- **[Request Number]:** [Briefly describe why the response or objection is insufficient, e.g., "The defendant asserted a boilerplate 'overly broad' objection and failed to produce any responsive documents regarding..."]
- **[Request Number]:** [Briefly describe the deficiency.]

We request that you provide supplemental responses and the missing production by [Date/Time]. If we cannot resolve these issues, we intend to file a Motion to Compel with the Court.

I am available to discuss these matters via telephone on [Date] at [Time]. Please let me know if this time works for you, or propose an alternative time for our conference.

Sincerely,

[Your Signature]  
[Your Printed Name]