

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

[Date]

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

Re: [Case Name and Court Docket Number]
Subject: Good Faith Consultation Regarding Discovery Disputes

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to resolve several outstanding discovery disputes in the above-referenced matter, pursuant to [Insert Local Rule or Procedure, e.g., Federal Rule of Civil Procedure 37(a)(1)].

Specifically, we have identified the following deficiencies regarding [Plaintiff's/Defendant's] responses to [Insert Set of Discovery, e.g., First Set of Interrogatories]:

- **[Interrogatory/Request No. X]:** [Briefly state why the response is insufficient, such as "Defendant provided boilerplate objections" or "The response is non-responsive."]
- **[Interrogatory/Request No. Y]:** [Briefly state the issue, such as "Documents were promised but have not been produced."]

Our position is that these requests are relevant and proportional to the needs of this case because [Brief Reason]. We would like to avoid the necessity of filing a Motion to Compel and believe we can reach a resolution without court intervention.

Please let me know if you are available for a "meet and confer" telephone call on [Date] at [Time] to discuss these issues. If that time is not convenient, please provide alternative dates and times.

We look forward to receiving your supplemental responses or discussing this further.

Sincerely,

[Your Signature]

[Your Printed Name]