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

[Date]

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

RE: [Case Name] v. [Case Name]
Case Number: [Case Number]
Subject: Notice of Deficiencies in Discovery Responses

Dear [Opposing Counsel Name],

I am writing to you regarding the discovery responses served by [Party Name] on [Date]. Upon review, we have identified several deficiencies that prevent us from moving forward with the discovery process. This letter serves as a formal request to meet and confer regarding these issues.

Specifically, the following responses are deficient:

- **[Interrogatory/Request No. X]:** [Explanation of deficiency, e.g., Response is evasive, incomplete, or contains boilerplate objections.]
- **[Interrogatory/Request No. Y]:** [Explanation of deficiency, e.g., Documents were referenced but not produced.]
- **[Interrogatory/Request No. Z]:** [Explanation of deficiency, e.g., Improper claim of privilege without a privilege log.]

We request that you provide supplemental responses and the missing production by [Date]. If we do not receive the corrected responses or a response to this letter by that time, we will be forced to seek the court's intervention via a Motion to Compel.

Please let me know if you are available for a brief call on [Date] at [Time] to discuss these matters and attempt to resolve them without court involvement.

Sincerely,

[Your Signature]

[Your Printed Name]