SENT VIA EMAIL AND U.S. MAIL

Date: [Date]

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

RE: [Case Name] / Case No. [Case Number]

Dear [Opposing Counsel Name],

This letter serves as a formal "meet and confer" regarding the outstanding discovery requests in the above-referenced matter. To date, we have not received responses to the following requests served on [Date of Original Service]:

- [Name of First Discovery Request, e.g., Plaintiff's First Set of Interrogatories]
- [Name of Second Discovery Request, e.g., Plaintiff's First Request for Production of Documents]

The deadline for these responses was [Original Due Date]. While we would prefer to resolve this matter without court intervention, your failure to provide timely responses is causing unnecessary delay in this litigation.

Please provide the complete, verified responses and all responsive documents by [Deadline Date/Time]. If we do not receive the responses by this time, we will be forced to file a Motion to Compel Discovery with the Court and seek all available sanctions, including an award of attorney's fees incurred in bringing the motion.

I look forward to your prompt compliance.

Sincerely,

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