

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

[Date]

[Opposing Counsel/Party Name]
[Opposing Address]
[City, State, Zip Code]

RE: [Case Name/Reference Number] - Notice of Breach of Agreement and Discovery Non-Compliance

Dear [Name],

This letter serves as formal notice that you are in material breach of the [Title of Agreement, e.g., Client Service Agreement/Settlement Agreement] dated [Date], and are further in non-compliance with your discovery obligations under [State Rules of Civil Procedure/Specific Court Order].

1. Breach of Agreement:

Specifically, you have failed to perform the following obligations as outlined in Section [Section Number] of the Agreement:

[Detail the specific breach, e.g., failure to pay, failure to provide services, or unauthorized disclosure].

2. Discovery Non-Compliance:

Pursuant to the [Interrogatories/Request for Production] served on [Date], your responses were due on [Due Date]. To date, we have not received:

[List missing documents or responses].

Your failure to provide these materials is hindering the progress of this matter and constitutes a violation of our discovery rules.

Required Action:

To cure these defaults, you must provide the outstanding discovery responses and remedy the aforementioned breach no later than [Deadline Date/Time].

Failure to comply with this demand will result in immediate legal action, which may include filing a Motion to Compel, seeking evidentiary sanctions, and pursuing all available remedies for breach of contract, including the recovery of attorney's fees and costs.

Please govern yourself accordingly.

Sincerely,

[Your Signature]

[Your Printed Name]