

Instruction: This is a model letter. Adapt to fit your facts and circumstances.

Date

Name
Address Line 1
Address Line 2
City, State Zip Code

VIA FACSIMILE AND U.S. MAIL

Re: Name v. Name.

Dear Name:

We are in receipt of Name 's Responses to Plaintiff's Second Request for Admissions and Plaintiff's Second Request for Production of Documents. Contrary to Name 's stated objection, the Order entered by the Court on Date **expressly provides** that Name was entitled to propound one or more sets of Interrogatories, Request for Production of Documents and Requests for Admissions. The only limitation was that the set or sets of interrogatories would not exceed 30. The Order did not limit additional discovery to **only** 30 additional interrogatories. Also, we believe it is the position of the Federal Court in to allow additional sets of Document Requests and Admissions without Court approval. Only interrogatories are limited by Local Rule and require Court approval to exceed the maximum of 30.

Moreover, we consider Name 's responses to have been filed in bad faith. This appears to be another blatant attempt to delay a trial of this matter by failing to respond to discovery so as to prevent or hinder Name from meeting the Date motion deadline or forcing Name to agree to an Amended Scheduling Order.

Please reconsider the objection asserted and inform me by end of business on Date whether Name intends to provide legitimate responses. If legitimate responses are not to be provided in the **very near** future, we will proceed with a Motion to Compel and seek recovery of our attorneys fees and costs.

Sincerely,

Name

by:
Name

/