

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

**Re: Name vs. Name; U. S. District  
Court Civil Action No.**

Dear Name:

We have reviewed Name's Answers and Objections to Plaintiff's Second Set of Interrogatories. We believe that many of the objections are meritless and simply further demonstrate Name's refusal to be cooperative regarding discovery in this matter. Most of the interrogatories request information similar to that requested in Plaintiff's First Set of Interrogatories which the Court compelled Name to answer after Name asserted similar meritless objections. Therefore, we respectfully request that Name reconsider its position and voluntarily provide the information requested.

In particular, we believe that the objections to Interrogatories No. request information that is relevant to preparation of Plaintiff's case and is no more burdensome than similar types of information which the Court has previously compelled Name to provide. Also, we believe that your objections to Interrogatory No. are inappropriate. Even counting sub-parts to previous interrogatories in a light most favorable to Name, Name does exceed the permitted additional interrogatories until after Interrogatory No. .

Please reconsider your objection and responses to these interrogatories and inform me whether Name intends to voluntarily answer these interrogatories in good faith. If you do not inform me of Name's intent to do so by the close of business on Date, we will file a Motion to Compel the information requested.

Further, I believe your Answer to Interrogatory No. relative to Name is incorrect. It is my understanding from another local attorney that Name gave deposition testimony on behalf of this attorney's client. This attorney also stated that he believed Name stated in that deposition he had testified in other cases and had been admitted as an expert by Judge Name.

Sincerely,

Name

BY Name