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[Your Name]
[Street address]
[City, State ZIP]
[Telephone]
[Email]

[Date]

VIA EMAIL

[Counsel name]
[Firm]
[Address]
[Email]

Re: [Your Name] v. [Defendants], No. [_____] ([District])
Deficiencies in Defendants' Responses to Plaintiff's First
Requests
for Production and First Set of Interrogatories

Dear [Counsel]:

I write under Rule 37(a)(1) and Local Rule [__] to confer about
Defendants'
responses served on [date]. I have identified the deficiencies below
and ask
that Defendants cure each one by [proposed date, typically 10 to 14
days out].
If you believe any item is not deficient, please tell me why so we
can narrow
what remains in dispute.

1. Request for Production No. 3 (body-camera recordings).

Request: "All body-worn camera recordings from any officer
present at the
scene of Plaintiff's arrest on [date], from activation through
deactivation, in native format with metadata."

Response: "Objection, overbroad and unduly burdensome. Subject to
and
without waiving, see Exhibit 1."

Deficiency: The objection does not state the specific grounds or
whether
responsive material is being withheld, as Rule 34(b)(2)(B)-(C)
requires.

Exhibit 1 is a 90-second excerpt from one camera. The request
seeks the

complete recordings from every camera present.

Cure requested: Produce the complete recordings from each officer's camera in native format with metadata, or state specifically what is being withheld and on what ground.

2. Interrogatory No. 4 (facts supporting the resistance contention).

Request: "State every fact on which Defendants base the contention that Plaintiff resisted arrest, identifying the source of each fact."

Response: "See incident report and body-camera video."

Deficiency: An interrogatory must be answered in writing. Rule 33(d) permits reference to business records only where the answer may be derived from them with equal burden and the records are specified in sufficient detail. The response does neither.

Cure requested: A complete written answer stating each fact and its source, signed under oath by the answering Defendant as Rule 33(b)(3) and (5) require.

3. Request for Production No. 7 (internal affairs file).

Request: "The complete internal affairs or professional standards file concerning the incident of [date]."

Response: "Objection. Privileged under the law enforcement and deliberative process privileges."

Deficiency: No privilege log has been served. Rule 26(b)(5)(A) requires a description of each withheld document sufficient to assess the claim.

Rule 34(b)(2)(C) requires the objection to state whether material is being withheld.

Cure requested: A privilege log identifying each withheld document by date, author, recipients, type, subject matter, privilege asserted, and basis, and production of every responsive document not logged.

4. Request for Production No. 9 (use-of-force reports).

Request: "All use-of-force reports, supervisory reviews, and related forms created in connection with the incident of [date]."

Response: "None."

Deficiency: The response does not describe the search performed. Department General Order [__], produced as Bates [__], requires a use-of-force report whenever [trigger]. Plaintiff's complaint alleges that [trigger occurred].

Cure requested: A description of the search performed, including custodians and systems searched, and either production of the responsive reports or a statement, signed under Rule 26(g), that none were created.

[Continue, one numbered item per deficient request.]

Plaintiff reserves all rights, including the right to move to compel under Rule 37(a) as to any item not cured by [proposed date].

I am available to confer by telephone on [two or three dates and times]. Please let me know which works, or propose another.

Sincerely,

[Your Name]
Plaintiff, pro se

CONFERENCE RECORD

[Your Name] v. [Defendants], No. [_____]

Date / time	Method	Participants	Subject / result
-----	-----	-----	-----
[date, time]	Email	[Me]; [Counsel]	Sent deficiency
letter (4 items). Proposed			cure date
[date]. Offered call on [dates].			
[date, time]	Phone	[Me]; [Counsel]	Item 1: counsel
agreed to produce full			recordings by
[date]. Item 2: counsel will			supplement by
[date]. Item 3: counsel			maintains
privilege; will serve log by			[date]. Item 4:

counsel to confirm search

[date] Email [Counsel] to [Me]
recordings for two of three

supplement to Interrog. 4.

[date] Email [Me] to [Counsel]
on items 2-4. No response

by [date].
Received

officers. No

No log.
Requested status

as of [date].

Unresolved as of [date]: Items 2, 3, 4; Item 1 as to Officer [__]'s
camera.