March 31, 2023

Dear xxxxx,

On February 1, 2023, our client Michael H. Anderson propounded Special Interrogatories, Set Three, consisting of 34 interrogatories, upon your client, Defendant Alexis Waterford.

On February 24, 2023, Waterford served a hybrid set of responses to each interrogatory containing objections and certain substantive responses.

Please consider this letter our initial outreach in a good-faith attempt to meet-and-confer regarding your client’s responses, which were deficient as follows:

{%p for method in methods %}

{% for ncr in objection\_categories[method].ncr.true\_values() %}

***{{ method }} No. {{ ncr }}***

{{ method }} No. {{ ncr }} states:

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Waterford’s ’s response was:

yyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyy

The above response is not code-compliant.

{% for objection in objection\_categories[method].objections[ncr].selected %}

{% for blurb in objection.blurbs %}

1. {{ blurb }}

{% endfor %}

{% endfor %}

{% endfor %}

{%p endfor %}

Cordially,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Big Shot Lawyer