{% if doc.sign\_date == ‘Today’ %}February 16, 2023{% elif doc.sign\_date == ‘Choose Different Date’ %}{{doc.sign\_date\_alternate}}{% else %}xxxx[date]xxxx{% endif %}

Dear xxxxx,

On {{ propound\_svc\_date }}, our client {{ disco.propounder }} propounded {{ disco.type }}, Set {{ disco.set\_no }}, consisting of {{ number\_propounded }} interrogatories, upon {{ responder }}.

On {{ response\_svc\_date }}, {{ disco.responder }} served responses.

Please consider this letter our initial outreach in a good-faith attempt to meet-and-confer regarding your client’s responses.

{{ disco.responder }}’s interrogatory responses were deficient as follows:

{%p for p in pet %}

***Interrogatory No. {{ p }}***

Interrogatory No. {{ p }} states:

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

{{ responder }}’s response was:

yyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyyy

The above response is not code-compliant.

{%p if pet[p].custom\_critique %}

First, {{ pet[p].custom\_critique }}

{%p endif %}

{%p for row in pet[p].selected\_labels\_df.iterrows() %}

{% if pet[p].custom\_critique %}Next, {% endif %}{{ row[1]["Blurb"] }}

{%p if pet[p].specific\_request\_for\_further\_response %}

{{ pet[p].specific\_request\_for\_further\_response }}

{%p endif %}

{%p endfor %}

{%p endfor %}

Cordially,

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

Big Shot Lawyer