

Sample Written Discovery Dispute Chart¹
Submitted by (Plaintiff/Defendant)
Case No: 00-cv-00001

No./Type of Discovery Request	Disputed Response(s) or Objection(s)	Problem With Response
Plaintiff's Rog No. 2	1. Overbroad and burdensome; 2. Vague and ambiguous	Information sought is reasonably defined and limited in scope.
Plaintiff's Rog No. 6	1. Confidential and proprietary; 2. Remote in time	No privilege log provided. No explanation for time objection.
General Objection No. 2	Responses are based on information that is presently available.	Not applied in any specific response, therefore waived.
Plaintiff's RFP No. 8	1. Attorney-client privilege; 2. Not relevant; 3. Overbroad and burdensome; 4. Vague and ambiguous	No privilege log provided. Reasonably calculated to lead to discovery of admissible evidence. Information sought is reasonably defined and scope is limited.

¹ Acceptable abbreviations include "Rog" for Interrogatory, "RFP" for Request for Production; "RFA" for Request for Admission; "SDT" for Subpoena Duces Tecum.