

[Sender's Name]
[Sender's Law Firm/Company]
[Address]
[City, State, Zip Code]
[Email]
[Phone Number]

[Date]

[Recipient's Name]
[Recipient's Law Firm]
[Address]
[City, State, Zip Code]

Re: [Case Name / Case Number]
Subject: Progress Update on Document Production Discovery

Dear [Recipient's Name],

I am writing to provide an update regarding the status of our document production in response to [Party Name]'s [First/Second] Request for Production of Documents, dated [Date of Request].

Current Status:

To date, we have completed the collection phase for [Number] out of [Total Number] identified custodians. Our technical team has finished the initial processing of electronic data and we are currently in the process of reviewing these materials for privilege and responsiveness.

Production Milestones:

- **Rolling Production:** We intend to produce documents on a rolling basis. The first set of responsive, non-privileged documents is expected to be delivered by [Date].
- **Privilege Log:** A corresponding privilege log for withheld documents will be provided on or before [Date].
- **Technical Issues:** [Optional: Mention any data corruption, encryption, or volume issues here, or state "No significant technical delays have been encountered at this time."]

Estimated Completion:

We currently anticipate completing the production for this phase by [Date]. We are making every effort to adhere to the discovery schedule and will notify you immediately if any unforeseen circumstances arise that may impact this timeline.

Please let us know if you would like to schedule a brief meet-and-confer to discuss any specific categories of documents that you would like prioritized in our upcoming rolling productions.

Sincerely,

[Signature]

[Sender's Printed Name]