

**Date:** [Insert Date]

**To:** [Recipient Name/Opposing Counsel]

**From:** [Your Name/Law Firm]

**Case Name:** [Insert Case Name/Style]

**Matter Number:** [Insert Reference Number]

**Subject: Status Update Regarding Electronic Discovery Phase**

Dear [Recipient Name],

We are writing to provide a formal progress update regarding the Electronic Discovery (e-discovery) phase for the above-referenced matter.

**1. Data Collection Status:**

We have successfully identified and preserved data from [Number] key custodians. To date, collection is [Percentage]% complete. We expect to finalize all data harvesting by [Date].

**2. Processing and Filtering:**

The collected data is currently being processed. We are applying the agreed-upon search terms and date delimiters. Initial filtering has reduced the document pool to approximately [Number] items for manual review.

**3. Review and Production:**

Our legal team began the privilege and relevance review on [Date]. We are currently on schedule to meet the production deadline. We anticipate delivering the first rolling production on [Date].

**4. Technical Issues:**

[Describe any technical delays, such as encrypted files or legacy formats, or state "No significant technical issues have been encountered at this time."]

**5. Upcoming Milestones:**

- Completion of Search Term Validation: [Date]
- Privilege Log Delivery: [Date]
- Final Production Completion: [Date]

Please contact us if you have any questions regarding these updates or if you wish to schedule a brief meet-and-confer to discuss technical specifications.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title/Firm Name]