

[Date]

[Opposing Counsel Name]

[Opposing Law Firm]

[Address]

[City, State, Zip]

Re: [Case Name and Docket Number] - Initial Meet and Confer Regarding ESI Protocols

Dear [Opposing Counsel Name],

In accordance with [Applicable Rule, e.g., FRCP 26(f)], I am writing to initiate a meet and confer regarding the preservation and production of electronically stored information (ESI) in this matter.

To ensure an efficient discovery process, we propose discussing the following topics during our upcoming conference:

- **Preservation:** Confirmation that all parties have issued litigation holds and suspended automatic deletion policies for relevant data.
- **Custodians:** Identification of the key individuals whose ESI will be searched.
- **Date Ranges:** Agreement on the relevant time periods for data collection.
- **Search Methodology:** Discussion of search terms, predictive coding, or other filtering technologies to be utilized.
- **Production Format:** Agreement on file formats (e.g., Native, TIFF, or PDF), load files, and the handling of metadata.
- **Privilege:** Protocols for a privilege log and "clawback" agreements under [Applicable Rule, e.g., FRE 502(d)].

We suggest holding this conference on [Proposed Date] at [Time] via [Phone/Video Link]. Please let us know if this time is convenient for you, or propose an alternative schedule.

We look forward to working cooperatively to streamline the ESI process.

Sincerely,

[Your Name]

[Your Law Firm]