

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

Re: Follow-Up to Meet and Confer Regarding ESI Protocols

Case Name: [Case Name]

Case Number: [Case Number]

Dear [Counsel Name],

I am writing to follow up on our meet and confer conference held on [Date] regarding the protocols for the production of Electronically Stored Information (ESI) in the above-referenced matter.

During our discussion, we addressed several key points, including:

- The scope of searchable data sources and custodians;
- Relevant date ranges for ESI collection;
- Specific keywords and search methodologies; and
- The preferred production format (e.g., Native, TIFF/Load File, searchable PDF).

Based on our conversation, it is my understanding that [Summary of Agreements Reached]. However, the following issues remain unresolved: [List Outstanding Issues].

Specifically, we request that you provide your position on [Specific Technical Requirement or Modification] by [Date]. We believe that reaching an agreement on these technical specifications now will prevent future discovery disputes and minimize the costs of production for both parties.

Please let me know if you would like to schedule a brief follow-up call to finalize the ESI Protocol order for submission to the court. I look forward to your prompt response.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email Address]