

[Date]

[Opposing Counsel Name]
[Opposing Counsel Law Firm]
[Address]
[City, State, Zip Code]

Re: [Case Name and Docket Number] - Meet and Confer Regarding Proposed ESI Search Terms

Dear [Counsel Name],

I am writing to meet and confer regarding the search terms and protocols for Electronically Stored Information (ESI) in the above-referenced matter. Pursuant to [Local Rule/Civil Procedure Rule], we propose the following parameters to ensure a focused and efficient discovery process.

Proposed Search Terms:

We propose that the following keywords and Boolean strings be applied to the identified ESI repositories:

- [Term 1]
- [Term 2] OR [Term 3]
- [Term 4] w/5 [Term 5]
- [Term 6] NOT [Term 7]

Proposed Custodians:

We have identified the following individuals as the primary custodians likely to possess relevant ESI:

- [Custodian Name 1]
- [Custodian Name 2]

Proposed Date Range:

We propose a temporal limitation for the search from [Start Date] to [End Date].

Next Steps:

Please review these terms and provide your feedback, including any counter-proposals or additional terms you believe are necessary. If we cannot reach an agreement via email, I am available for a telephonic meet and confer on [Date] at [Time].

We look forward to your response.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email Address]