

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

[Date]

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

Re: [Case Name / Case Number] - Meet and Confer Regarding ESI Privilege Log Deficiencies

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the privilege log served by your office on [Date] in response to [Discovery Request Set Name]. Upon review, we find the current log insufficient to evaluate the claims of privilege over the Electronically Stored Information (ESI) withheld from production.

Specifically, we identify the following deficiencies:

- **Lack of Specificity:** Descriptions such as "legal advice" or "attorney-client communication" are too categorical and do not provide the factual basis for the privilege claim.
- **Missing Metadata:** The log fails to include essential ESI metadata such as original file names, creation dates, and the specific "To/From/CC/BCC" fields for email threads.
- **Email Threading:** Several entries appear to suppress entire email threads without identifying the individual participants or specific dates for each message within the chain.
- **Incomplete Recipient List:** The log does not clarify whether all recipients on the communications are employees of the client or legal counsel, which is necessary to determine if privilege was waived.

We request that you provide an amended privilege log that complies with [State/Federal Rule of Civil Procedure Number] by [Date]. We are also proposing a telephonic meet and confer on [Date] at [Time] to discuss a streamlined ESI logging protocol, such as a "Metadata Plus" log or categorical logging for specific non-controversial date ranges.

Please let us know your availability to discuss these matters and whether you will provide the amended log without the need for court intervention.

Sincerely,

[Signature]
[Typed Name]