

[Your Name/Law Firm]
[Address]
[City, State, Zip Code]
[Phone Number]
[Email]

[Date]

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

Re: [Case Name] / Case No. [Case Number]
Subject: Meet and Confer Regarding ESI Production Format and Metadata

Dear [Opposing Counsel Name],

Pursuant to [Relevant Civil Procedure Rule, e.g., FRCP 26(f)], I am writing to initiate a meet and confer regarding the production of Electronically Stored Information (ESI) in the above-referenced matter.

To ensure an efficient discovery process and avoid future disputes, we propose the following production format for all ESI:

- **File Format:** ESI should be produced in [Single-page TIFF/Native/Searchable PDF] format, accompanied by industry-standard load files (.DAT and .OPT).
- **Metadata Fields:** Each production should include a load file containing the following metadata fields:
 - BegBates / EndBates
 - BegAttach / EndAttach
 - Custodian
 - Date Sent / Date Received / Date Created
 - Author / From / To / CC / BCC
 - Subject Line / File Name
 - MD5 Hash Value
- **Text Files:** Document level OCR or extracted text should be provided for all documents.
- **Native Files:** Spreadsheets (e.g., Excel), presentations (e.g., PowerPoint), and multimedia files should be produced in their native format with a placeholder image in the TIFF set.

Please let us know if you agree to these specifications or if you wish to propose alternative formats. We are available to discuss this on [Date] at [Time] via telephone/video conference.

We look forward to reaching an agreement on these technical specifications to facilitate a smooth discovery exchange.

Sincerely,

[Your Signature]

[Your Printed Name]