

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

**Re: [Case Name and Docket Number] - Meet and Confer Regarding Third-Party ESI Protocols**

Dear [Counsel Name],

I am writing to initiate a meet and confer regarding the establishment of protocols for the production of electronically stored information (ESI) from third parties in the above-referenced matter.

To ensure consistency, technical compatibility, and to avoid unnecessary motion practice, we propose that the parties agree to a standardized ESI Protocol to be served with all Rule 45 subpoenas. We believe a uniform approach will streamline the review process and reduce costs for both the parties and the producing non-parties.

Specifically, we would like to discuss the following items:

- Standardization of production formats (e.g., Load files, TIFF/PDF images, and Native files).
- Requirement for extracted text and searchable metadata fields.
- Procedures for handling de-duplication and email threading.
- Methods for the secure transmission of produced data.
- Provisions for clawback agreements and Rule 502(d) orders applicable to third-party productions.

Please let me know your availability for a brief telephonic conference on [Date] at [Time] or [Date] at [Time] to discuss these protocols. If these times do not work for you, please suggest an alternative.

I look forward to hearing from you.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Contact Information]