

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

[Date]

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

Re: [Case Name], Case No. [Case Number] - Meet and Confer Regarding ESI Preservation Protocols

Dear [Opposing Counsel Name],

I am writing to schedule a meet and confer session, pursuant to [Local Rule/Federal Rule of Civil Procedure 26(f)], to discuss the preservation and production of Electronically Stored Information (ESI) in the above-referenced matter.

We believe it is essential to establish a clear protocol early in this litigation to avoid disputes regarding data loss or formatting. We propose discussing the following topics during our conference:

- **Identification of Custodians:** Identifying the individuals most likely to possess relevant ESI.
- **Date Ranges:** Establishing the relevant timeframes for data collection.
- **Data Sources:** Identifying systems to be searched, including servers, local hard drives, mobile devices, cloud storage, and ephemeral messaging platforms.
- **Search Terms and Methodologies:** Discussing the use of keywords, predictive coding, or other technology-assisted review (TAR).
- **Production Format:** Agreeing on file formats (e.g., Native, TIFF, or PDF) and the required metadata fields.
- **Privilege Logs:** Establishing the format and timing for privilege logs.
- **Preservation Obligations:** Confirming that litigation holds have been issued and discussing the suspension of "auto-delete" or "recycling" policies.

I am available to meet via [Telephone/Video Conference] at the following times:

- [Date and Time 1]
- [Date and Time 2]
- [Date and Time 3]

Please let me know which of these times works for you, or propose an alternative schedule. We look forward to a productive discussion.

Sincerely,

[Your Signature]

[Your Printed Name]