

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

[Date]

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

**RE: [Case Name and Court Docket Number]**  
**Subject: Pre-Motion Meet and Confer Regarding Deficiencies in [Party Name]'s Privilege Log**

Dear [Opposing Counsel Name],

I am writing regarding the Privilege Log served by [Party Name] on [Date]. Following a review of the log, we have identified several deficiencies that prevent us from assessing the validity of your privilege assertions. This letter serves as our formal meet and confer effort to resolve these issues before seeking court intervention.

Specifically, the Privilege Log is deficient for the following reasons:

- **Generic Descriptions:** Multiple entries (e.g., [List Entry Numbers]) use vague descriptions such as "legal advice" or "attorney communication" without providing sufficient factual context to determine if the communication relates to legal advice rather than business matters.
- **Missing Information:** Several entries (e.g., [List Entry Numbers]) fail to include mandatory information such as the author, all recipients, or the date of the document.
- **Inadequate Foundation for Work Product:** Documents marked as "Work Product" (e.g., [List Entry Numbers]) do not indicate that the materials were prepared specifically in anticipation of litigation.
- **Inclusion of Non-Privileged Parties:** Certain entries (e.g., [List Entry Numbers]) list third parties among the recipients, which likely constitutes a waiver of any privilege.

To comply with [Local Rule/State Code], please provide a supplemental privilege log that addresses these deficiencies by [Date]. We are available to discuss these issues via telephone on [Date] at [Time] if you believe a conference would be more productive.

We hope to resolve this matter without the need for a Motion to Compel or an *in camera* review by the Court. We look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]