

[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 Outstanding Privilege Log**

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding [Defendant/Plaintiff]'s failure to produce a privilege log in connection with [his/her/its] responses to [Name of Discovery Request, e.g., Plaintiff's First Set of Requests for Production], which were served on [Date].

In the responses provided on [Date], [Defendant/Plaintiff] withheld numerous documents based on assertions of attorney-client privilege and/or the work-product doctrine. However, to date, no privilege log has been produced. Pursuant to [Federal Rule of Civil Procedure 26(b)(5) / State Code Section], a party withholding discovery on the basis of privilege must expressly make the claim and describe the nature of the documents in a manner that enables other parties to assess the claim.

The current lack of a privilege log prevents us from evaluating the validity of your privilege assertions and is causing a delay in the discovery process. We request that you provide a compliant privilege log that includes the following for each withheld document:

- Date of the document;
- Identity of the author(s);
- Identity of all recipients (including CC and BCC);
- The specific privilege being asserted; and
- A description of the subject matter sufficient to justify the privilege claim.

Please let us know by [Date/Time] when we can expect to receive the log. If we do not receive the log or a definitive production date by that time, we will be forced to seek the Court's intervention and request an order compelling production, as well as any applicable sanctions.

I am available to discuss this matter further via telephone on [Date] at [Time] should you wish to resolve this informally.

Sincerely,

[Your Signature]

[Your Printed Name]