

URGENT: MEET AND CONFER REGARDING DISCOVERY DELINQUENCY

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

Re: [Case Name / Case Number]

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding your client's failure to provide a privilege log in response to [Plaintiff/Defendant]'s [Name of Discovery Request], served on [Date Discovery Served].

While you served responses on [Date Responses Served] asserting various privileges (including attorney-client privilege and work product protection), you have failed to provide a corresponding privilege log. Pursuant to [State/Federal Rule of Civil Procedure], a party withholding otherwise discoverable information by claiming privilege must expressly make the claim and describe the nature of the documents in a manner that enables other parties to assess the claim.

Your failure to provide a log prevents us from evaluating the validity of your assertions and is currently obstructing the discovery process. Please be advised that the continued failure to provide a privilege log may result in a waiver of those privileges.

We demand that you produced a comprehensive privilege log no later than [Date/Time]. If we do not receive the log by this deadline, we will have no choice but to seek judicial intervention, including filing a Motion to Compel and requesting associated sanctions.

I am available to discuss this matter via telephone on [Date] at [Time] should you wish to resolve this without motion practice.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]