

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

[Date]

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

**Re: [Case Name] / [Case Number]**  
**Subject: Meet and Confer Regarding Overdue Privilege Log**

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve a discovery dispute pursuant to [Insert Applicable State or Federal Statute/Rule, e.g., CCP § 2031.310 or Fed. R. Civ. P. 37].

On [Date], your office served responses to [Name of Discovery Request, e.g., Plaintiff's First Set of Requests for Production]. In those responses, you withheld several responsive documents based on various privileges, including [Attorney-Client Privilege / Work Product Doctrine]. However, your responses were not accompanied by a privilege log.

Pursuant to [Insert Rule, e.g., Fed. R. Civ. P. 26(b)(5)(A) or Local Rule], a party withholding information under a claim of privilege must expressly make the claim and describe the nature of the documents, communications, or tangible things not produced in a manner that will enable other parties to assess the claim. Your failure to provide a log prevents us from evaluating the validity of your assertions.

Please provide a comprehensive privilege log that includes the following for each withheld document:

- Date of the document;
- Identity of the author(s);
- Identity of the recipient(s);
- General subject matter/description of the document; and
- The specific privilege being asserted.

Please provide this log no later than [Date]. If we do not receive the log or a reasonable timeline for its production by that date, we will have no choice but to seek the Court's intervention through a Motion to Compel.

I am available to discuss this matter further should you wish to do so. I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]