

[Sender Name]  
[Sender Law Firm]  
[Sender Address]  
[City, State, Zip Code]  
[Email Address]

[Date]

**Via [Method of Delivery: e.g., Email / U.S. Mail]**

[Recipient Name]  
[Recipient Law Firm]  
[Recipient Address]  
[City, State, Zip Code]

**Re: [Case Name], Case No. [Case Number]**  
**Subject: Deficiency in Discovery Responses - Missing Privilege Log**

Dear [Recipient Name],

I am writing to follow up regarding [Party Name]'s responses and document production served on [Date], in response to [Moving Party]'s [First/Second/Third] Set of Requests for Production of Documents.

While your responses include general and specific objections based on the attorney-client privilege and/or the work-product doctrine, we have not yet received a corresponding privilege log. Pursuant to Federal Rule of Civil Procedure 26(b)(5) [or applicable State Local Rule], a party withholding information based on a claim of privilege must expressly make the claim and describe the nature of the documents in a manner that, without revealing privileged information, enables other parties to assess the claim.

Without a privilege log, we are unable to evaluate the validity of your assertions or determine if documents are being improperly withheld. Please provide a privilege log that includes the following for each withheld document:

- The date of the document;
- The identity of the author(s);
- The identity of the recipient(s);
- A description of the subject matter; and
- The specific privilege or protection being asserted.

Please provide the missing privilege log by [Date]. If we do not receive the log or a definite timeline for its production by that date, we will be forced to seek the Court's intervention to compel production and/or request that the Court deem any such privileges waived.

I am available to discuss this matter via telephone on [Date/Time] if you believe a meet-and-confer call would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]  
Counsel for [Client Name]