

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

Re: [Case Name and Court Reference Number]

Subject: Meet and Confer Regarding Delinquent Privilege Log

Dear [Counsel Name],

I am writing to meet and confer in good faith regarding your client's failure to provide a privilege log in response to [Plaintiff/Defendant]'s [Name of Discovery Request, e.g., First Set of Requests for Production], served on [Date].

Although you have asserted various privileges (including attorney-client privilege and work product protection) in your written responses dated [Date], you have failed to produce a privilege log that complies with [cite specific Local Rule or Civil Procedure Rule, e.g., FRCP 26(b)(5)].

As you are aware, a party withholding information based on 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 enables other parties to assess the claim.

To date, we have received no such log. Please be advised that if a compliant privilege log is not received by [Time] on [Date], we will be forced to seek judicial intervention. This may include a Motion to Compel production of the log and a request for a finding that all asserted privileges have been waived due to your client's non-compliance.

I am available to discuss this matter via telephone at [Phone Number] on [Date/Time] if you believe a conference will resolve this issue without the need for a formal motion.

We look forward to your prompt response and the immediate production of the log.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Contact Information]