

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

[Date]

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

Re: [Case Name], Case No. [Case Number]

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the conduct of your office during the deposition of [Deponent Name] held on [Date]. Specifically, we are concerned with the frequent use of "speaking objections" and improper coaching of the witness.

During the deposition, you repeatedly interjected with objections that went beyond stating the legal basis, such as [provide specific examples, e.g., "if you remember," "asked and answered," or explanations that suggested an answer to the witness]. Under [State/Federal] Rule of Civil Procedure [Insert Rule Number, e.g., 30(c)(2)], objections must be stated concisely and in a non-argumentative and non-suggestive manner.

These interjections disrupt the flow of the examination and interfere with our right to obtain the witness's spontaneous and independent testimony. This letter serves as a formal request that you cease these practices in all future depositions in this matter.

I am available on [Date] at [Time] to discuss this issue further to avoid the necessity of seeking a protective order or moving for sanctions from the Court. Please let me know if this time works for you, or propose an alternative time for a brief call.

Sincerely,

[Your Signature]
[Your Printed Name]