

**SENT VIA EMAIL**

**DATE:** [Date]

**TO:** [Opposing Counsel Name]

**FROM:** [Your Name]

**RE:** Meet and Confer Regarding Improper Deposition Conduct in [Case Name/Number]

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer effort regarding your conduct during the deposition of [Witness Name] on [Date]. Specifically, this office objects to the repeated use of "speaking objections" and "coaching" of the witness, which interfered with the discovery process.

During the deposition, the following improper behaviors were noted:

- **Speaking Objections:** You provided suggestive objections that went beyond stating the legal basis, effectively signaling to the witness how to answer the question.
- **Witness Coaching:** On several occasions, you interrupted pending questions to consult with the witness or to provide "clarifications" that influenced the witness's testimony.
- **Improper Directions Not to Answer:** You instructed the witness not to answer questions that did not involve privileged information or court-ordered limitations.

Under [Insert Applicable Civil Procedure Rule, e.g., Federal Rule of Civil Procedure 30(c)(2)], objections must be stated concisely and in a non-argumentative and non-suggestive manner. Your conduct violated these standards and hindered my ability to obtain a fair and spontaneous examination of the witness.

We request that you confirm in writing by [Date/Time] that you will cease these practices for the remainder of this deposition and all future depositions in this matter. If we cannot reach an agreement, we will be forced to seek the court's intervention, including a protective order and a request for sanctions or the recovery of costs for a reconvened deposition.

I am available to discuss this matter via telephone at [Time] on [Date]. Please let me know if that works for your schedule.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Law Firm]

[Your Contact Information]