

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

[Date]

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

**Re: [Case Name] / [Court Case Number]**

**Subject: Meet and Confer Regarding Unprofessional Conduct and Harassment during Deposition of [Deponent Name]**

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer effort regarding your conduct during the deposition of [Deponent Name] held on [Date].

The purpose of this letter is to address behavior that we believe violates [State/Federal] Rules of Civil Procedure and the local rules of professional conduct. Specifically, your actions during the proceedings were obstructive and harassed the deponent in the following ways:

- **Unprofessional Tone and Manner:** [Describe specific instances of shouting, aggressive posturing, or insults].
- **Improper Questioning:** [Describe repetitive, badgering, or argumentative questions intended to embarrass or intimidate].
- **Interference with Testimony:** [Describe interruptions or refusal to allow the deponent to finish answers].

Under [Cite Specific Rule, e.g., FRCP 30(d)], a deposition may be terminated or limited on the ground that it is being conducted in bad faith or in a manner that unreasonably annoys, embarrasses, or oppresses the deponent.

We request that you provide a written assurance by [Date/Time] that you will adhere to the rules of professional conduct for all remaining sessions. Failure to rectify this behavior will leave us no choice but to seek a protective order and request sanctions, including the costs and fees associated with bringing such a motion and the necessity of a supervised deposition.

I am available to discuss this matter via telephone on [Date] at [Time] to resolve this issue without further court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]