

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

[Date]

[Opposing Counsel Name]
[Opposing Law Firm]
[Opposing Counsel 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 repeated and unjustified instructions not to answer provided during the deposition of [Witness Name] held on [Date].

During the deposition, you instructed the witness not to answer [Number] separate questions. Under [Applicable Civil Procedure Rule, e.g., FRCP 30(c)(2)], an instruction not to answer is only appropriate when necessary to preserve a privilege, to enforce a limitation ordered by the court, or to present a motion to terminate or limit the examination.

A review of the transcript reveals that your instructions were based on [List improper objections, e.g., relevance, hearsay, or "asked and answered"], none of which constitute valid grounds to obstruct the witness's testimony. These repeated interruptions hindered the discovery process and prevented the disclosure of non-privileged information relevant to [Specific Issue/Claim].

This letter serves as a formal request that you withdraw these objections and produce the witness for a supplemental deposition, at your client's expense, to answer the questions previously blocked. We are also seeking an agreement that such instructions will not recur in future depositions in this matter.

Please let me know by [Date/Time] if you are willing to resolve this issue without court intervention. If we cannot reach an agreement, we will be forced to file a Motion to Compel and seek appropriate sanctions, including attorney's fees and costs associated with the frustrated deposition and the subsequent motion practice.

I am available to discuss this matter via telephone on [Date] at [Time].

Sincerely,

[Your Signature]

[Your Printed Name]