

[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: Meet and Confer Regarding Deposition of [Deponent Name] in [Case Name/Number]**

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the deposition of [Deponent Name] which took place on [Date]. This letter serves as a formal request to resolve issues stemming from your late arrival and the premature termination of the proceedings.

The deposition was noticed to begin at [Scheduled Start Time]. However, you and the deponent did not arrive until [Actual Arrival Time], resulting in a delay of [Duration]. Furthermore, at [Time of Termination], you unilaterally terminated the deposition despite the fact that I had not completed my examination and significant time remained under the statutory limits.

As a result of these actions, I was unable to question the witness on several key areas, including: [List Brief Topics].

Please provide three alternative dates within the next fourteen (14) days to resume and complete this deposition. We expect the deponent to be produced for the remaining [Number] hours of testimony. Additionally, we request that you reimburse our firm for the unnecessary court reporter and videographer fees incurred due to the shortened session.

If we do not receive a response confirming new dates by [Date/Time], we will be forced to seek relief from the Court, including a motion to compel and a request for monetary sanctions.

I look forward to your prompt response to resolve this matter without judicial intervention.

Sincerely,

[Your Signature]

[Your Printed Name]