

[Sender's Name]
[Law Firm Name]
[Address]
[City, State, Zip Code]
[Email Address]
[Phone Number]

[Date]

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

Re: [Case Name and Court Case Number]

Dear [Opposing Counsel's Name],

I am writing this letter to meet and confer regarding the unacceptable conduct that occurred during the deposition of [Deponent Name] on [Date].

Specifically, your behavior during the proceedings was physically intimidating and aggressive. According to the record and observations made during the session, you engaged in the following actions: [List specific behaviors, e.g., leaning into the deponent's personal space, shouting, slamming objects on the table, or blocking exits].

Such conduct violates the standards of professional courtesy and the rules of civil procedure. Physical intimidation and aggressive posturing interfere with the integrity of the discovery process and create a hostile environment for the witness and counsel.

This letter serves as a formal request that you immediately cease all aggressive and intimidating tactics for the remainder of this litigation. I propose the following remedies to ensure future depositions proceed professionally:

- Strict adherence to professional codes of conduct;
- Maintaining a respectful physical distance from the witness at all times;
- [Optional] The presence of a discovery referee or videographer to monitor conduct;
- [Optional] Conducting future sessions via remote video platform to ensure physical safety.

Please contact me by [Date] to discuss how we can ensure that future depositions are conducted in a professional and safe manner. If we are unable to reach an agreement regarding these behavioral standards, I will be forced to seek a protective order and sanctions from the Court.

I look forward to your prompt response.

Sincerely,

[Sender's Signature]

[Typed Name]