

[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: [Case Name] / Case No: [Case Number]**  
**Subject: Meet and Confer Regarding Obstructionist Tactics and Deposition Delays**

Dear [Opposing Counsel Name],

I am writing this letter pursuant to [Local Rule/State Statute] to meet and confer in a good faith effort to resolve ongoing issues regarding the deposition of [Deponent Name], currently scheduled/previously attempted on [Date].

During the course of these proceedings, your conduct has hindered the fair examination of the witness. Specifically, our records indicate the following obstructionist tactics:

- Making speaking objections that suggest answers to the witness;
- Instructing the witness not to answer questions that do not involve privileged information;
- Engaging in private consultations with the witness while a question is pending;
- Frequent and unwarranted interruptions that disrupt the flow of the deposition.

These actions violate [Relevant Code of Civil Procedure/Rule] and serve only to delay the discovery process and increase the costs of litigation. We are entitled to a thorough and unobstructed examination of the witness.

Please consider this a formal request to cease these tactics immediately. Furthermore, we require that you provide [Available Dates] to complete/resume this deposition without further interference. If we cannot reach an agreement on the conduct of this deposition by [Date/Time], we will have no choice but to seek judicial intervention, including a motion for protective order or a motion to compel, and will request sanctions and reimbursement for attorney's fees.

I am available to discuss this matter via telephone on [Date] at [Time]. I look forward to your prompt cooperation.

Sincerely,

[Your Signature]

[Your Printed Name]