

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

[Date]

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

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

**Subject: Meet and Confer Regarding Excessive and Frivolous Objections During Deposition of [Witness Name]**

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding your conduct during the deposition of [Witness Name] held on [Date]. During this proceeding, you interposed a series of excessive and frivolous objections that served to disrupt the flow of testimony and suggest answers to the witness.

Specifically, the record reflects that you engaged in the following:

- **Speaking Objections:** You frequently provided legal arguments or factual summaries within your objections, effectively coaching the witness on how to respond.
- **Baseless Instructions Not to Answer:** You instructed the witness not to answer questions that did not involve privileged information, in violation of [Reference Local Rule/Civil Procedure Rule].
- **Redundant Objections:** You repeatedly objected to the form of questions that were clear and concise, seemingly to frustrate the questioning process.

Under [Cite Relevant Statute or Rule, e.g., FRCP 30(c)(2)], objections must be stated concisely and in a non-argumentative and non-suggestive manner. Your conduct failed to meet this standard and resulted in [mention consequence, e.g., unnecessary delay/increased costs/need for a second session].

I request that we schedule a call by [Date/Time] to discuss these issues. It is my hope that we can reach an agreement to refrain from such tactics in future depositions to avoid the necessity of seeking a protective order or moving for sanctions and costs from the Court.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]