

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

[Date]

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

Re: [Case Name] / [Case Number]

Subject: Meet and Confer Regarding Deposition Time Limits and Conduct

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve issues arising from the deposition of [Witness Name] held on [Date]. During this proceeding, several violations of the [State/Federal] Rules of Civil Procedure and the Court's guidelines occurred.

Specifically, the deposition exceeded the [7-hour / prescribed] time limit as set forth in [Rule Number]. Despite my notice that the time limit had expired, you continued to question the witness on matters that were repetitive and cumulative.

Furthermore, I am concerned regarding the following conduct:

- [Insert specific violation, e.g., Speaking objections that suggested answers to the witness]
- [Insert specific violation, e.g., Unreasonable interruptions and argumentative questioning]
- [Insert specific violation, e.g., Improper instructions to the witness not to answer]

Under [Rule Number], depositions must be conducted in a professional and efficient manner. The excessive duration and conduct noted above are prejudicial and have resulted in unnecessary delay and expense.

I request that we schedule a brief call by [Date] at [Time] to discuss how we will proceed with any remaining testimony and to ensure future depositions in this matter comply strictly with the time limits and guidelines. It is my hope to resolve this without seeking a protective order or moving for sanctions from the Court.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]