

[Date]

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

Re: [Case Name and Case Number]

Subject: Meet and Confer Regarding Threatening Language Toward Examining Counsel

Dear [Opposing Counsel Name],

I am writing to meet and confer regarding the conduct of your client, [Name of Deponent], during the deposition held on [Date].

During the course of the examination, [Name of Deponent] used threatening and abusive language directed toward me as examining counsel. Specifically, at [Time/Page/Line Number], the witness stated: "[Quote the specific threatening language]."

This behavior is a violation of the [State/Federal] Rules of Civil Procedure and the standards of professional conduct. Threatening language serves no purpose other than to harass, intimidate, and obstruct the discovery process. Such conduct is unacceptable and will not be tolerated.

I am requesting that you counsel your client regarding appropriate deposition decorum. We require a formal assurance that all future proceedings will be conducted in a professional and non-threatening manner. If this behavior continues, we will be forced to suspend the deposition and seek a protective order, as well as monetary sanctions and attorney's fees from the Court.

Please let me know by [Date/Time] if you are available to discuss this matter further or if you will provide the requested assurance in writing.

Sincerely,

[Your Name]
[Your Law Firm]
[Your Phone Number]
[Your Email]