

[Your Name/Law Firm]
[Your Address]
[City, State, Zip Code]
[Your Phone Number]
[Your 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 Discovery Requests dated [Date]

Dear [Opposing Counsel Name],

I am writing this letter to meet and confer in good faith regarding the [Interrogatories / Requests for Production / Deposition Notice] served by your office on [Date]. We are seeking to resolve these discovery issues without the need for judicial intervention. However, if we cannot reach an agreement, we intend to file a Motion for Protective Order.

Specifically, we object to the following items:

[Item Number/Request Number]:

This request is [overbroad / burdensome / seeks privileged information / irrelevant to the subject matter]. [Provide brief explanation of why the request is improper]. We propose narrowing the scope of this request to [Propose Alternative Scope].

[Item Number/Request Number]:

This request seeks [Confidential / Proprietary] information. We are willing to produce responsive documents only upon the execution of a mutually agreeable Stipulated Protective Order.

Please review our objections and let us know by [Date/Time] if you are willing to withdraw or modify these requests as suggested. We are available to discuss these matters via telephone on [Date] at [Time].

We hope to resolve these issues amicably and look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]