

[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 and Case Number]**

Dear [Opposing Counsel Name],

This letter serves as a formal "meet and confer" regarding the proposed Protective Order in the above-referenced matter, pursuant to [State/Federal Rule Number].

We have reviewed the draft Protective Order provided by your office on [Date]. We find the current draft to be overbroad for the following reasons:

- [Reason 1: e.g., The definition of "Confidential" material is not limited to trade secrets.]
- [Reason 2: e.g., The "Attorneys' Eyes Only" designation is applied to non-sensitive documents.]
- [Reason 3: e.g., Disagreement regarding the disposal of documents at the conclusion of the case.]

Our position is that the Protective Order should be modified to [State Proposed Modification]. We believe this change will ensure the protection of sensitive information without unnecessarily hindering the discovery process or the public's right to access judicial records.

I am available to discuss these issues further via telephone on [Date] at [Time]. Please let me know if this time works for you, or propose an alternative time so we may resolve this dispute in good faith without court intervention.

I look forward to hearing from you.

Sincerely,

[Your Signature]  
[Your Printed Name]