

[Sender's Name]
[Sender's Law Firm/Company]
[Address]
[City, State, Zip Code]
[Email Address]
[Phone Number]

[Date]

[Recipient's Name]
[Recipient's Law Firm]
[Address]
[City, State, Zip Code]

Re: [Case Name], Case No. [Case Number] - Meet and Confer Regarding Discovery Requests

Dear [Recipient's Name],

I am writing to meet and confer in good faith regarding [Plaintiff/Defendant]'s [Name of Discovery Set, e.g., First Set of Interrogatories], which were served on [Date].

After reviewing the requests, we find that several items are overbroad, unduly burdensome, and not proportional to the needs of the case as required by [Applicable Rule, e.g., Rule 26 of the Federal Rules of Civil Procedure]. Specifically, we have the following concerns:

- 1. Overbroad Scope:** Request Nos. [List Numbers] seek "all documents" related to [Topic] without any limitation to the specific claims at issue in this litigation. We request that you narrow these requests to a specific timeframe and subject matter.
- 2. Undue Burden:** Request Nos. [List Numbers] require a search of [Describe Burden, e.g., legacy backup tapes or thousands of irrelevant personnel files]. The cost and time required to fulfill these requests far outweigh their potential evidentiary value.
- 3. Vague/Ambiguous Terms:** Request Nos. [List Numbers] utilize terms such as "[Term]" which are not defined and are susceptible to multiple interpretations, making a concise response impossible.

Our goal is to provide relevant discovery while avoiding unnecessary expense. We propose the following modifications: [Insert Proposed Compromise, e.g., limiting the search to key custodians and a three-year period].

Please let me know if you are available to discuss these issues via telephone on [Date] at [Time]. If we are unable to reach an agreement, we will be forced to seek a protective order from the Court.

I look forward to hearing from you.

Sincerely,

[Your Signature]

[Your Printed Name]