

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

[Date]

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

**Re: [Case Name and Case Number]**

Dear [Opposing Counsel Name],

I am writing to meet and confer in good faith regarding your client's [objections/responses] to [Propounding Party's Name]'s [First/Second] Set of [Interrogatories/Requests for Production], served on [Date].

Specifically, we are concerned with the objections regarding the scope of discovery for the following requests: [List Request Numbers, e.g., Request Nos. 5, 8, and 12].

You have objected to these requests on the grounds that they are [overbroad / burdensome / not proportional to the needs of the case / irrelevant]. We disagree with these characterizations for the following reasons:

- **Relevance:** The information sought is directly relevant to [Specific Issue/Claim/Defense] as it pertains to [Brief Explanation].
- **Proportionality:** The burden of production is minimal compared to the high evidentiary value of these materials, which are within your client's exclusive control.
- **Temporal Scope:** The time period requested ([Date Range]) is reasonably limited to the events surrounding the litigation.

We would like to resolve this matter without court intervention. Please let us know if you are willing to withdraw these objections and provide supplemental responses by [Date].

I am available for a telephonic conference to discuss these issues further on [Date] at [Time]. Please let me know if that works for your schedule.

Sincerely,

[Your Signature]  
[Your Printed Name]