

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

[Date]

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

RE: [Case Name]; Case No. [Case Number]
Subject: Follow-Up Meet and Confer Regarding Proposed Protective Order

Dear [Opposing Counsel Name],

I am writing to follow up on our previous correspondence and discussion regarding the necessity of a Protective Order in the above-referenced matter. We last discussed this issue on [Date of Last Discussion].

As discussed, [Your Client Name] maintains that a Protective Order is necessary because [State brief reason, e.g., discovery requests seek confidential commercial information, trade secrets, or private medical records]. Under [State Local Rule or Civil Procedure Code], a Protective Order is appropriate to facilitate the exchange of sensitive information while protecting the parties from unnecessary disclosure.

To date, we have not reached an agreement on the following terms:

- [Disputed Term 1]
- [Disputed Term 2]

We believe our proposed draft, sent on [Date], is consistent with the standard model protective orders used in this District. In an effort to resolve this without court intervention, we are willing to [State any compromise or request for specific counter-proposals].

Please let me know by [Date/Time] if you are willing to stipulate to the current draft or if you have specific language changes to propose. If we cannot reach an agreement by that time, we will be forced to seek relief from the Court by filing a Motion for Protective Order.

I am available for a brief call on [Date] at [Time] if you would like to discuss this further.

Sincerely,

[Your Signature]

[Your Printed Name]