

**VIA EMAIL AND U.S. MAIL**

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

**RE: [Case Name / Case Number] - Meet and Confer Regarding Trade Secret Confidentiality**

Dear [Name],

I am writing to meet and confer regarding the protection of trade secrets and confidential information in the above-referenced matter. We believe a robust Stipulated Protective Order is necessary before the exchange of sensitive data.

Our client intends to produce documents that contain highly sensitive proprietary information, including:

- [List specific category, e.g., Source code or technical specifications]
- [List specific category, e.g., Customer lists and pricing formulas]
- [List specific category, e.g., Internal strategic marketing plans]

Because the disclosure of this information to competitors or the public would cause irreparable competitive harm, we propose the following tiers of confidentiality:

**1. "Confidential" Designation:** For information that is sensitive but may be viewed by the parties and their counsel.

**2. "Highly Confidential - Attorneys' Eyes Only" (AEO):** For trade secrets and technical data that must not be disclosed to the receiving party's employees, officers, or directors, but only to outside counsel and retained experts.

We have attached a draft Protective Order for your review. Specifically, please note the provisions regarding:

- Procedures for challenging designations.
- Protocols for the return or destruction of materials at the conclusion of litigation.
- Inadvertent disclosure (Clawback) provisions.

Please let us know by [Date] if you agree to the terms of the attached draft or if you wish to schedule a call to discuss specific modifications. We look forward to resolving this matter efficiently.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]