

SENT VIA EMAIL

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

Re: [Case Name / Case Number]

Subject: Meet and Confer Regarding Deposition Limitations for [Name of Deponent]

Dear [Opposing Counsel Name],

I am writing to meet and confer in a good faith effort to resolve our dispute regarding the deposition of [Name of Deponent], currently scheduled for [Date].

Specifically, we object to the following limitations/requirements proposed in your recent correspondence dated [Date]:

- **Duration:** [Explain why the time limit is insufficient or why the requested extension is unreasonable].
- **Scope of Inquiry:** [Explain objection to limitations on specific topics or instructions not to answer].
- **Location/Method:** [Explain objection to remote vs. in-person or location requirements].
- **Document Production:** [Address issues regarding documents requested in the subpoena duces tecum].

Our position is supported by [Cite relevant Rule of Civil Procedure, e.g., Rule 30], which provides that [Briefly state the legal basis]. The proposed limitations unduly restrict our ability to develop relevant evidence and prepare for trial.

We would like to resolve this matter without court intervention. Please let me know your availability for a brief call on [Date] at [Time] to discuss these issues further. If we cannot reach an agreement, we will be forced to seek relief from the Court via a [Motion to Compel / Motion for Protective Order].

I look forward to your prompt response.

Sincerely,

[Your Name]
[Your Law Firm]
[Your Phone Number]
[Your Email]