

[Your Name/Law Firm Name]

[Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip Code]

Re: [Case Name] vs. [Case Name]

Case No.: [Case Number]

Subject: Meet and Confer Regarding Subpoena to [Name of Subpoenaed Party]

Dear [Counsel Name],

This letter serves as a formal meet and confer regarding the subpoena issued by your office on [Date] to [Name of Subpoenaed Party]. We demand that you formally withdraw this subpoena by [Date/Time] for the reasons set forth below.

The subpoena is improper and legally deficient because:

- **[Reason 1, e.g., Overbroad/Unduly Burdensome]:** The request seeks information that is not proportional to the needs of the case and imposes an undue burden.
- **[Reason 2, e.g., Privilege]:** The documents requested are protected by [Attorney-Client Privilege / Work Product Doctrine / Privacy Rights].
- **[Reason 3, e.g., Relevance]:** The information sought is not relevant to any claim or defense in this litigation.
- **[Reason 4, e.g., Procedural Defect]:** The subpoena failed to provide adequate notice or was improperly served under [Code Section].

Please confirm in writing by [Deadline Date] that you will withdraw the subpoena. If you refuse to withdraw the subpoena or narrow its scope to an acceptable level, we will be forced to file a Motion to Quash and/or Motion for a Protective Order. Please be advised that we will seek an award of monetary sanctions and attorney's fees incurred in bringing such a motion.

I am available to discuss this matter further via telephone on [Date] at [Time] if you believe a conversation will resolve this dispute without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]