

VIA EMAIL

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

Re: [Case Name], Case No. [Case Number] - Joint Meet and Confer Regarding Proposed Protective Order

Dear [Counsel Name],

This letter summarizes the results of the meet and confer session held on [Date] between [Your Name] and [Opposing Counsel Name] regarding the entry of a Protective Order to govern the exchange of confidential information in this matter.

1. Points of Agreement:

The parties have reached an agreement on the following provisions of the Protective Order:

- The general definition of "Confidential" information.
- Procedures for designating and marking documents.
- Basic protocols for the storage and destruction of protected materials at the conclusion of litigation.
- [Insert other agreed points].

2. Points of Dispute:

Despite good faith efforts, the parties remain unable to resolve the following issues:

- **[Issue 1: e.g., "Attorneys' Eyes Only" Designation]:** [Plaintiff/Defendant] contends that [Reasoning]. [Plaintiff/Defendant] maintains that [Counter-argument].
- **[Issue 2: e.g., Scope of Third-Party Disclosures]:** [Plaintiff/Defendant] proposes [Proposal], whereas [Plaintiff/Defendant] objects based on [Reasoning].
- **[Issue 3: e.g., Challenging Designations]:** The parties disagree on the timeline and burden of proof regarding challenges to confidentiality designations.

3. Proposed Next Steps:

Because the parties have reached an impasse on the items listed above, [Party Name] intends to file a [Joint Motion/Request for Discovery Conference] with the Court to resolve these remaining disputes. Attached to this letter is a redlined version of the draft Protective Order showing the specific language in contention.

Sincerely,

[Your Name]
[Your Law Firm]
Counsel for [Your Client]

cc: [Co-Counsel or Opposing Counsel]