

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

[Date]

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

RE: [Case Name / Case Number] - Meet and Confer Regarding Discovery Deficiencies

Dear [Opposing Counsel Name],

I am writing this letter in a good faith effort to meet and confer regarding the discovery requests served by your office on [Date]. Specifically, we are seeking to resolve disputes regarding [List specific requests, e.g., Interrogatories 5-10 or Requests for Production 2, 4, and 7] prior to filing a Motion for a Protective Order.

As we discussed briefly on [Date of any previous conversation], my client objects to these requests on the following grounds:

- **Relevance:** The information sought is not relevant to the claims or defenses of any party.
- **Overbreadth/Undue Burden:** The scope of the request is overly broad and the burden of production outweighs its likely benefit.
- **Privilege/Privacy:** The requests seek information protected by [Attorney-Client Privilege / Work Product Doctrine / Right to Privacy].

We believe these requests are improper because [Provide brief legal/factual justification].

We are willing to provide [State any compromise or limited production you are offering] in exchange for your withdrawal of the disputed requests. However, if we cannot reach an agreement regarding these items by [Date/Time], we will be left with no choice but to seek judicial intervention by filing a Motion for a Protective Order pursuant to [State Local Rule/Civil Procedure Rule].

Please let me know if you are available for a brief call on [Date] at [Time] to discuss this further.

Sincerely,

[Your Signature]

[Your Printed Name]