

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

[Date]

[Recipient Name]
[Recipient Law Firm/Company Address]
[City, State, Zip Code]

RE: [Case Name and Court Case Number] - Meet and Confer Regarding Objections to Subpoena Served on [Third Party Name]

Dear [Recipient Name],

I am writing to meet and confer regarding the objections served by [Third Party Name] on [Date] in response to the Subpoena Duces Tecum issued by [Plaintiff/Defendant] on [Date].

After reviewing the objections, we believe that [Third Party Name]'s refusal to produce the requested documents is unjustified. Specifically, we seek to address the following items:

[List Specific Objection/Request Number]: [Briefly state why the objection is overbroad, irrelevant, or why the privilege claim is insufficient].

[List Specific Objection/Request Number]: [Briefly state why the information is necessary for the litigation and why the burden of production is reasonable].

Our goal is to obtain the necessary discovery without the need for motion practice. We are willing to consider a reasonable modification of the scope or the implementation of a protective order to address confidentiality concerns.

Please let us know your availability for a brief telephone conference on [Date] at [Time] or [Date] at [Time] to discuss these issues in an effort to reach an informal resolution.

We look forward to hearing from you by [Date].

Sincerely,

[Your Signature]
[Your Printed Name]