

SENT VIA EMAIL

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

Re: [Case Name], Case No. [Case Number]

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

Dear [Counsel Name],

I represent [Your Client's Name] in the above-referenced matter. This letter serves as a formal request to meet and confer regarding the subpoena duces tecum served on [Third Party Name] on [Date].

Upon review, [Your Client's Name] objects to the scope of the subpoena on the grounds that it is overbroad and seeks information that is not proportional to the needs of the case. Specifically, our objections include:

- **Temporal Scope:** The subpoena requests documents dating back to [Year], which far exceeds the relevant time period of the allegations in the complaint.
- **Subject Matter:** Requests [Number] through [Number] seek "any and all" communications and documents regardless of their connection to the specific legal claims at issue.
- **Privacy/Relevance:** The subpoena seeks sensitive commercial or personal information that has no bearing on the disputed facts of this litigation.

We believe the subpoena should be narrowed to the following parameters: [Proposed Narrowed Scope].

We would like to resolve this matter without the need for motion practice or an application for a protective order. Please let us know your availability on [Date] at [Time] to discuss these issues over the phone.

We look forward to hearing from you.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Contact Information]