

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

[Date]

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

Re: [Case Name / Case Number]

Subject: Meet and Confer Regarding Third-Party Subpoena Compliance Extension

Dear [Counsel Name],

I am writing to formally request a meet and confer regarding the subpoena served on [Name of Third Party] on [Date Subpoena was Served].

At this time, [Name of Third Party] is requesting an extension of time to comply with the requests for production. The current deadline is [Current Deadline Date], and we are requesting a new deadline of [Proposed New Deadline Date].

This extension is necessary due to the following reasons:

- The volume of documents requested requires additional time for collection and processing.
- Key personnel required to identify responsive documents have been unavailable due to [Reason, e.g., prior commitments/medical leave].
- Additional time is required to conduct a thorough privilege review to ensure no protected information is inadvertently disclosed.

We are making this request in good faith to ensure a complete and accurate response without the need for court intervention. Please let me know by [Date/Time] if you will stipulate to this extension.

If we are unable to reach an agreement, we will be forced to seek a protective order or move to quash the subpoena to preserve our client's rights. I look forward to your prompt response.

Sincerely,

[Your Signature]
[Your Printed Name]