

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

[Date]

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

RE: [Case Name / Case Number] - Meet and Confer Regarding Third-Party Privilege Log

Dear [Counsel Name],

We are writing to meet and confer regarding the privilege log provided by [Third-Party Name] on [Date] in response to the subpoena issued on [Subpoena Date]. After reviewing the log, we find the descriptions provided are insufficient to establish the claimed protections.

Specifically, we contest the following entries: [List Entry Numbers or Categories].

Our objections include the following points:

- **Vague Descriptions:** Entries [Numbers] fail to describe the nature of the documents or communications in a manner that allows us to assess the claim of privilege.
- **Incomplete Recipient Information:** Entries [Numbers] do not identify all authors and recipients, or their professional roles, making it impossible to determine if privilege was waived by disclosure to third parties.
- **Overbroad Assertions:** It appears that [Attorney-Client Privilege / Work Product Doctrine] is being applied to purely factual or business communications that do not involve legal advice.
- **Missing Information:** The log lacks [Dates / Subject Lines / Document Types] for several key entries.

Under [Applicable Federal/State Rule of Civil Procedure], a privilege log must provide sufficient underlying facts to support each element of the asserted privilege. The current log falls short of this standard.

We request that you provide an amended privilege log addressing these deficiencies or produce the withheld documents by [Date]. Please let us know if you are available for a telephonic conference on [Date/Time] to discuss this matter further before we seek judicial intervention.

Sincerely,

[Your Signature]

[Your Printed Name]