

[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 and Docket Number] - Meet and Confer Regarding Third-Party Subpoena Search Terms

Dear [Counsel Name],

I am writing to meet and confer regarding the Electronically Stored Information (ESI) search terms proposed for the subpoena served on [Third Party Name] on [Date].

Upon reviewing the initial list of terms provided on [Date], we find that the current parameters are overbroad and likely to capture a significant volume of irrelevant or privileged information. To ensure a more targeted and efficient production that minimizes unnecessary burden on the third party, we propose the following modifications:

1. Proposed Narrowing of Search Terms:

- **Original Term:** [Term A]
Proposed Modification: [Term A] AND [Specific Project/Name]
- **Original Term:** [Term B]
Proposed Modification: [Term B] within 5 words of [Keyword]
- **Proposed Deletions:** [List terms to be removed as too generic]

2. Revised Date Range:

We propose narrowing the temporal scope from [Original Date Range] to [Proposed Date Range] to align more closely with the relevant events in this litigation.

3. Custodian Limitations:

We suggest limiting the search to the following key custodians who are most likely to possess responsive information: [Name 1, Name 2].

Our goal is to reach an agreement that facilitates the discovery of relevant evidence without necessitating motion practice. Please let us know by [Date/Time] if these modified terms are acceptable or if you are available for a brief call to discuss these adjustments further.

Sincerely,

[Your Signature]

[Your Printed Name]