

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

[Date]

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

Re: Meet and Confer Regarding Redactions in Response to Subpoena Issued to [Third-Party Name] in [Case Name/Case Number]

Dear [Recipient Name],

I am writing to meet and confer regarding the document production served by [Third-Party Name] on [Date] in response to the subpoena issued on [Date]. Upon review of the production, we have identified several redactions that appear improper or overbroad.

Specifically, we challenge the following redactions:

- **[Document ID/Bates Range]:** [Briefly state reason, e.g., Redacted for "relevance" which is not a valid basis for unilateral redaction of responsive documents.]
- **[Document ID/Bates Range]:** [Briefly state reason, e.g., Information appears to be factual data rather than protected PII or privileged communication.]
- **[Document ID/Bates Range]:** [Briefly state reason, e.g., Redactions prevent the understanding of the context of the underlying transaction.]

Under applicable discovery rules, a party or third party may generally only redact information that is subject to a recognized privilege (such as attorney-client privilege) or is protected by specific privacy laws. Redacting information simply because it is deemed non-responsive or sensitive-where a Protective Order is already in place to govern confidentiality-is insufficient.

We request that you provide a comprehensive privilege log for these redactions or, alternatively, produce unredacted versions of these documents [subject to the existing Protective Order] by [Date].

I am available to discuss this matter further on [Date] at [Time] if you believe a telephonic conference would help resolve this dispute without court intervention. Please let me know your availability.

Sincerely,

[Your Signature]

[Your Printed Name]