

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

[Date]

VIA [Email/U.S. Mail]

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

Re: [Case Name]
Case No.: [Case Number]
Subject: Meet and Confer Regarding Third-Party Subpoena to [Name of Third Party]

Dear [Opposing Counsel Name],

I am writing to meet and confer in good faith regarding the scheduling of the deposition of [Name of Third Party] pursuant to the subpoena issued on [Date Subpoena was Issued].

Currently, the deposition is noticed for [Current Date and Time]. However, [state reason for conflict, e.g., the witness is unavailable, a scheduling conflict with counsel, or more time is needed for document production].

To ensure the deposition proceeds efficiently, I propose the following alternative dates and times:

- [Proposed Date 1] at [Time]
- [Proposed Date 2] at [Time]
- [Proposed Date 3] at [Time]

Please let me know by the close of business on [Date] if any of these dates are acceptable to you and your client. Once we reach an agreement on the timing, I will [issue an amended notice / coordinate with the third party to finalize the arrangements].

I look forward to your prompt response so that we may resolve this matter without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]