

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

[Date]

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

Re: [Case Name and Case Number]

Subject: FINAL MEET AND CONFER REGARDING SUBPOENA TO [THIRD PARTY NAME]

Dear [Opposing Counsel Name],

This letter serves as our final attempt to meet and confer regarding the subpoena duces tecum issued to [Third Party Name] on [Date Subpoena was Served]. To date, our previous discussions on [Dates of Previous Communication] have failed to resolve our objections.

As previously stated, we object to the subpoena on the following grounds:

- [Objection 1: e.g., The request seeks information protected by attorney-client privilege.]
- [Objection 2: e.g., The subpoena is overbroad and not proportional to the needs of the case.]
- [Objection 3: e.g., The request seeks private financial or personnel records irrelevant to the claims.]

Despite our efforts to reach a compromise, you have indicated that you will not [withdraw/limit/modify] the subpoena. Please be advised that if we do not receive written confirmation by [Time] on [Date] that you intend to [withdraw the subpoena/narrow the scope as requested], we will have no choice but to file a Motion to Quash and/or Motion for Protective Order.

We remain open to a reasonable resolution that protects my client's rights while providing relevant discovery. However, we must proceed with motion practice if this matter is not resolved immediately.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]