

[Your Name]
[Your Law Firm/Company]
[Your Address]
[Your Email]
[Your Phone Number]

[Date]

[Opposing Counsel Name]
[Opposing Law Firm]
[Opposing Counsel Address]

Re: [Case Name] / [Case Number]
Subject: Meet and Confer Regarding Request for Extension of Time for Document Production

Dear [Opposing Counsel Name],

I am writing to follow up on my previous request for an extension of time regarding [Plaintiff/Defendant]'s responses and production of documents to [Name of Document Request Set], which are currently due on [Current Due Date].

As we discussed, my client requires additional time to complete the collection and review of responsive documents due to [Reason for delay, e.g., the volume of electronic records, third-party processing time, or unavailability of key personnel]. We are acting in good faith to fulfill our discovery obligations but cannot complete a thorough production by the current deadline.

We are requesting an extension of [Number] days, making the new deadline [Proposed New Date].

The purpose of this letter is to meet and confer in a good faith effort to resolve this scheduling issue without court intervention. Please let me know by [Time/Date] if you will stipulate to this extension. If we are unable to reach an agreement, we will be forced to seek a protective order or an extension from the Court.

I look forward to your prompt response.

Sincerely,

[Your Signature]
[Your Printed Name]