

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

[Date]

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

Re: [Case Name and Docket Number]

Subject: Notice of Deficiencies Regarding Privilege Log and Delayed Production

Dear [Opposing Counsel Name],

I am writing in good faith to meet and confer regarding the status of your document production and the deficiencies found in the privilege log provided on [Date].

Delayed Document Production

To date, your responses to our [First/Second] Request for Production of Documents remain incomplete. Specifically, the following categories of documents are outstanding: [List specific missing categories]. Please provide a definitive date by which we can expect the remaining production. Failure to provide these documents promptly is hindering our ability to proceed with [Depositions/Upcoming Deadlines].

Privilege Log Deficiencies

Upon reviewing your privilege log, we find it fails to meet the requirements of [Applicable Civil Rule, e.g., Rule 26(b)(5)]. The log is deficient in the following areas:

- **Vague Descriptions:** Entries such as "[Example: Legal Advice]" do not provide sufficient factual information to assess the claim of privilege.
- **Missing Information:** Several entries lack the [Date, Author, or Recipient] necessary to verify the communication.
- **Inadequate Basis:** It is unclear how the [Attorney-Client Privilege / Work Product Doctrine] applies to [Specific Entry Numbers] given that [Reason, e.g., third parties were included in the communication].

We request that you provide an amended privilege log and the outstanding documents by [Date]. If we cannot resolve these issues, we will be forced to seek the Court's intervention through a Motion to Compel.

Please let me know if you are available for a brief call on [Date/Time] to discuss these matters further.

Sincerely,

[Your Signature]

[Your Printed Name]