

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

[Date]

[Name of Requesting Party/Attorney]  
[Law Firm Name]  
[Address]  
[City, State, Zip Code]

Re: [Case Name and Docket Number]  
Subject: Objections to Subpoena Duces Tecum dated [Date of Subpoena]

Dear [Name of Counsel/Requesting Party],

I am writing on behalf of [Your Name/Company Name] to formally object to the subpoena served on [Date of Service] in the above-referenced matter.

Specifically, [Your Name/Company Name] objects to [Request Numbers/All Requests] on the ground that the scope is overbroad, unduly burdensome, and seeks information that is neither relevant to the claims or defenses in this action nor proportional to the needs of the case.

The requests as currently drafted are not limited to a specific timeframe, subject matter, or individual, and would require an exhaustive search of records that are not material to the litigation. Compliance with the subpoena as written would impose an unreasonable financial and administrative burden on [Your Name/Company Name].

While [Your Name/Company Name] objects to the subpoena in its current form, we are willing to meet and confer in good faith to discuss a reasonable narrowing of the scope of these requests to reach a mutually agreeable resolution.

Please contact me by [Date] to discuss this matter further. [Your Name/Company Name] will not produce documents responsive to the overbroad requests until these objections are resolved.

Sincerely,

[Your Signature]

[Your Printed Name]