

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

[Date]

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

Re: [Case Name and Docket Number]
Subject: Objections to Subpoena Served on [Date]

Dear [Counsel Name],

This letter serves as a formal objection to the subpoena served on [Name of Recipient] on [Date of Service] in connection with the above-referenced matter. We object to the production of the requested materials on the grounds that the subpoena imposes an undue burden and expense.

Specifically, we object to the following requests: [List specific Request Numbers].

These requests constitute an undue burden because:

- [Reason 1: e.g., The scope of the request is overbroad and not limited by time or subject matter.]
- [Reason 2: e.g., The cost of searching, collecting, and reviewing the requested electronically stored information (ESI) exceeds the potential value of the evidence.]
- [Reason 3: e.g., The information requested is cumulative or can be obtained from a more convenient or less expensive source.]
- [Reason 4: e.g., Compliance would require significant disruption to business operations.]

Accordingly, we will not produce documents responsive to these requests as currently phrased. We are willing to meet and confer to discuss a narrowing of the scope of these requests to reduce the burden and expense of production.

Please contact me by [Date] to schedule a time to discuss these objections.

Sincerely,

[Signature]

[Typed Name]