

[Your Name/Law Firm Name]

[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] v. [Case Name]

Case No.: [Court Case Number]

Subject: Objections to Subpoena Duces Tecum served on [Name of Recipient]

Dear [Counsel Name],

This office represents [Name of Recipient] regarding the subpoena duces tecum served on [Date]. Please be advised that [Name of Recipient] objects to the scope of the subpoena based on the following grounds:

- 1. Overbreadth:** The requests seeking [specify categories of documents] are overbroad as to time and subject matter, and are not limited to the specific issues relevant to this litigation.
- 2. Undue Burden:** The subpoena requires the production of [describe volume or type of data], the collection of which would impose an undue financial and administrative burden on [Name of Recipient] that outweighs the potential benefit to the requesting party.
- 3. Relevance:** Certain requests, specifically [Request Numbers], seek information that is neither relevant to the claims or defenses of any party nor proportional to the needs of the case.
- 4. Confidentiality/Privilege:** To the extent the subpoena seeks documents protected by the attorney-client privilege, the work-product doctrine, or trade secret protections, [Name of Recipient] objects to their production.

[Name of Recipient] is willing to meet and confer to discuss narrowing the scope of these requests to reach a reasonable accommodation. Please contact me by [Date] to schedule a conference.

Sincerely,

[Your Signature]

[Your Printed Name]