

Meet And Confer Letter

May 4, 2012

{YOUR INFO HERE}

Re: {JDB} v. {YOU}

Dear Mr. Harris,

I am in receipt of Plaintiff's responses to Defendant's Request for Production of Documents for the above referenced matter. As you must know, the responses received are incomplete in material ways and further responses are required. This is an attempt to meet and confer to avoid the necessity of motions to compel. For ease of reference, I set forth below defendant's request, plaintiff's response, and the reason why a further response must be provided:

Defendant's Request for Production of Documents No. 2:

ALL DOCUMENTS relating to or constituting ANY assignment to Plaintiff of the account referred to in the complaint.

Plaintiff's Response to Request No 2:

"Responding Party objects to this demand on the grounds that it requests documents that are protected by the attorney-client and work product privileges, and the request also seeks documents that are privileged, trade secret and proprietary in nature. Without waiving the foregoing objections and subject thereto, plaintiff responds as follows: Attached hereto as EXHIBIT 1 are non-privileged documents responsive to this demand"

Reason Why Further Response Should be Provided:

Exhibit 1 is a copy of terms and agreements for a chase card account. These documents in no way show any assignment of the account in question to the Plaintiff. Nowhere is there any reference to any account number or any assignment to the Plaintiff. The documents requested, if they exist, constitute agreements between plaintiff and the original creditor. There is no good faith basis for plaintiff to contend that responsive documents are protected by the attorney-client privilege, the work product doctrine, or constitute trade secrets.

If plaintiff does not have a valid assignment of the account at issue in the complaint, it does not have standing to pursue its claims. Please produce all documents responsive to this request.

If plaintiff does not do so within 10 days, defendant will file a motion to compel and will seek sanctions for having to bring an unnecessary motion.

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If you need to speak with me further about the matter feel free to contact me at the phone number at the top of this letter.

Thank You,

{YOUR NAME HERE}

In pro per