

Instruction: This is a model letter. Adapt to fit your facts and circumstances.

Date

Name
Address Line 1
Address Line 2
City, State Zip Code

VIA FACSIMILE

Re: Name v. Name

Dear Name:

It was my understanding from our telephone conversation on Date, that you had just learned that one of the individuals Name planned to designate as a 30(b)(6) representative would not be available on Date. Based this information and our ongoing efforts to reach agreement on a Stipulation regarding testimony on 30(b)(6) topics, we have decided not to go forward with the 30(b)(6) deposition on Date.

Please consider letter our notice to you that the Rule 30 (b)(6) deposition has again been postponed, to be re-noticed for a later date, if necessary. We do intend to proceed with the depositions of Name and Name as scheduled.

I look forward to seeing you in Name and working with you on the 30(b)(6) stipulation.

Sincerely,

Name

by:
Name

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