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

[Date]

[Seller's Name or Seller's Attorney Name]
[Address]
[City, State, Zip Code]

RE: Notice of Title Objection - Pending Litigation

Property Address: [Full Property Address]
Title Commitment/File Number: [File Number]

Dear [Name],

This firm represents [Buyer's Name] in connection with the purchase of the above-referenced property. Pursuant to the terms of the Purchase and Sale Agreement dated [Date], we have reviewed the title commitment provided by [Title Company Name].

This letter serves as formal notice of a title objection regarding the following matter disclosed in the title report:

Objection: Pending Litigation (Lis Pendens)
The title commitment reflects a pending lawsuit/notice of Lis Pendens under Case Number [Case Number] filed in [Court Name], titled [Plaintiff Name] vs. [Defendant Name]. This litigation appears to involve [briefly describe, e.g., a dispute over ownership/foreclosure/boundary lines], which constitutes a cloud on the title and renders it unmarketable.

In accordance with the contract, the Buyer requests that the Seller take all necessary actions to clear this objection prior to the closing date. This includes, but is not limited to, obtaining a formal dismissal of the litigation with prejudice and the recording of a release of Lis Pendens in the public records.

Please provide a written response within [Number] days confirming the steps being taken to resolve this matter. The Buyer reserves all rights under the contract, including the right to extend the closing date or terminate the agreement should the title not be cleared as required.

Sincerely,

[Your Signature]

[Your Printed Name/Firm Name]

cc: [Title Company Representative]