

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

[Date]

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

RE: [Case Name]

Case No.: [Court Case Number]

Subject: Status of Negotiations Regarding Evidentiary Stipulations

Dear [Opposing Counsel Last Name],

I am writing to follow up on our recent discussions regarding the proposed evidentiary stipulations for the upcoming trial/hearing scheduled for [Date].

As of today's date, the status of our negotiations is as follows:

1. Agreed Stipulations:

We have reached an agreement regarding the following items:

- [List agreed item, e.g., Authenticity of medical records from X Provider]
- [List agreed item, e.g., Foundation for business records of Y Company]
- [List agreed item, e.g., Waiver of hearsay objections for Exhibit Z]

2. Pending Stipulations:

The following items remain under review or require further clarification:

- [List pending item and current hurdle]
- [List pending item and current hurdle]

3. Disputed Items:

It appears we are unable to reach a stipulation on the following, which will likely require a ruling from the Court or formal testimony:

- [List disputed item]

In light of the [Court's Name] deadline for filing the Joint Pre-Trial Statement on [Deadline Date], I suggest we finalize the written "Stipulation of Facts and Admissibility of Exhibits" by [Date].

Please let me know if the summary above matches your records or if you have any revisions to the proposed language sent on [Date of last draft]. I look forward to hearing from you soon so we may streamline the presentation of evidence for the Court.

Sincerely,

[Your Signature]

[Your Printed Name]