

PRIVILEGED AND CONFIDENTIAL: ATTORNEY-CLIENT COMMUNICATION

[Date]

[Claims Examiner Name]
[Insurance Company Name]
[Address]
[City, State, Zip]

RE: Monthly Litigation Progress Report

Insured: [Insured Name]
Claimant: [Claimant Name]
Claim Number: [Claim Number]
Matter: [Case Caption/Court Docket Number]
Reporting Period: [Month, Year]

Dear [Claims Examiner Name],

Below is the progress report for the above-referenced matter regarding legal activity during the past month.

1. Current Status and Recent Activities

[Summarize motions filed, hearings attended, or pleadings exchanged this month.]

2. Discovery Update

Written Discovery: [Status of Interrogatories and Requests for Production]
Depositions: [List depositions taken this month and those scheduled for next month]

3. Evaluation of Liability and Damages

Liability: [Note any changes in the assessment of fault or negligence]
Damages: [Update on medical records, billing, or expert evaluations of the claim value]

4. Settlement Status / Alternative Dispute Resolution

[Details on any demands, offers, or upcoming mediation dates.]

5. Upcoming Deadlines and Future Action Plan

- [Deadline 1]
- [Deadline 2]
- [Next Step 1]

6. Updated Budget/Reserve Recommendation

[Indicate if the current litigation budget remains accurate or if reserve adjustments are recommended.]

Please contact me if you have any questions or require further clarification.

Sincerely,

[Attorney Name]
[Law Firm Name]