

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

[Date]

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

Re: [Case Name] / Case No: [Case Number]
Subject: Progress Update on Trial Exhibit Stipulations

Dear [Opposing Counsel Name],

I am writing to provide an update regarding the status of our review of the proposed trial exhibits and the ongoing efforts to reach a stipulation as to their admissibility.

To date, we have completed our review of the following exhibit categories: [List categories or exhibit numbers]. Based on this review, we are prepared to stipulate to the authenticity and admissibility of the exhibits listed in the attached "Draft Stipulation List."

However, we are still evaluating the following items: [List pending exhibits or categories]. We anticipate completing this review by [Date] and will provide our final position on these items at that time.

Additionally, we have identified objections to the following exhibits proposed by your office:

- Exhibit [Number]: [Brief reason, e.g., Hearsay/Relevance]
- Exhibit [Number]: [Brief reason]

We suggest a meet-and-confer conference on [Date/Time] to discuss these objections and finalize the joint exhibit list before the upcoming court deadline on [Court Deadline Date].

Please let me know if the proposed time works for you or suggest an alternative.

Sincerely,

[Your Signature]

[Your Printed Name]