

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

**VIA [METHOD OF DELIVERY: E-MAIL / U.S. MAIL]**

[Opposing Counsel Name]

[Opposing Law Firm Name]

[Address]

[City, State, Zip Code]

**Re: [Case Name]**

**Case No.: [Case Number]**

**Subject: Statutory Meet and Confer Regarding Defendant's Contemplated Motion to Strike**

Dear [Counsel Name]:

Pursuant to [Cite Applicable Statute, e.g., California Code of Civil Procedure Section 435.5], this letter serves as a formal meet and confer regarding Defendant [Name of Party]'s intent to file a Motion to Strike portions of the Complaint filed on [Date].

Defendant contends that the following portions of the Complaint are [irrelevant / false / improper / scandalous] and should be stricken:

**1. [Paragraph Number / Page and Line Number]:**

[Quote the specific language or describe the allegation].

**Basis for Striking:** [State legal grounds, e.g., Request for punitive damages fails to allege facts showing oppression, fraud, or malice under Civil Code 3294].

**2. [Paragraph Number / Page and Line Number]:**

[Quote the specific language or describe the allegation].

**Basis for Striking:** [State legal grounds, e.g., The request for attorney's fees is not supported by contract or statute].

The purpose of this letter is to determine whether Plaintiff will agree to voluntarily amend the Complaint to address these deficiencies, thereby avoiding the necessity of a formal motion and judicial intervention. Defendant is willing to provide an extension of time for you to file an amended pleading should you agree to do so.

Please let me know by [Date/Time] if you are willing to amend the Complaint or if you would like to schedule a telephonic conference to discuss these issues further. If we cannot reach an agreement, Defendant will proceed with filing the Motion to Strike.

I look forward to hearing from you.

Sincerely,

[Your Signature]

[Your Printed Name]

Counsel for [Defendant Name]