

**SENT VIA EMAIL AND U.S. MAIL**

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

**RE: [Case Name] / [Case Number] - Meet and Confer Regarding Motion to Strike [Title of Pleading]**

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer effort pursuant to [Local Rule/Code of Civil Procedure] regarding our intent to file a Motion to Strike portions of the [Complaint/Answer/Pleading] filed on [Date].

Specifically, we seek the removal of the following sections:

- **[Section/Paragraph Number]:** [Brief description of the specific language].
- **[Section/Paragraph Number]:** [Brief description of the specific language].

Our motion is based on the following legal grounds:

**1. Irrelevant or Immaterial Matter:** The allegations in [Paragraphs] do not relate to the essential elements of the causes of action and serve only to prejudice the jury and clutter the record.

**2. False or Sham Allegations:** The statements in [Paragraphs] are demonstrably false based on [Record/Evidence] and lack any good faith basis in fact.

**3. Improper Damages:** The request for [Punitive Damages/Attorney Fees] in [Section] is not supported by the underlying facts or the applicable statutes under [State/Federal] law.

**4. Redundant or Scandalous Matter:** The language used in [Paragraphs] is unnecessarily inflammatory and is not drawn in conformity with the rules of pleading.

We request that you voluntarily amend your pleading or stipulate to strike these portions to avoid unnecessary motion practice and the expenditure of judicial resources. Please let us know by [Date/Time] if you are willing to make these corrections.

We are available to discuss this matter further via telephone on [Date] at [Time].

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]