

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

[Date]

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

Re: [Case Name] / [Case Number]

Subject: SECOND MEET AND CONFER REGARDING DEFENDANT'S ANSWER

Dear [Opposing Counsel Name],

I am writing further to our initial meet and confer efforts regarding the deficiencies in the Answer filed by [Defendant Name] on [Date]. As we discussed on [Date of previous conversation/letter], the current Answer contains [briefly list issues, e.g., redundant material, immaterial matter, or legally insufficient defenses].

Specifically, we believe that the following portions of the Answer are subject to a Motion to Strike under [cite specific Code of Civil Procedure/Rule]:

- [First specific item/defense to be stricken]
- [Second specific item/defense to be stricken]

Despite our previous correspondence, these issues remain unresolved. This letter serves as a final attempt to resolve this matter informally without the need for court intervention. We request that you file an Amended Answer by [Date] to correct these defects.

If we do not receive an Amended Answer or a commitment to amend by the date specified above, we will proceed with filing a Motion to Strike. We will also seek the recovery of any applicable costs and fees incurred in bringing the motion.

I am available to discuss this further if you believe a telephone conference would be productive. I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]