

**CONFIDENTIAL FOR SETTLEMENT PURPOSES ONLY / SUBJECT TO RULE 408**

[Sender's Name]  
[Sender's Law Firm]  
[Sender's Address]  
[Email Address]  
[Phone Number]

[Date]

[Recipient's Name]  
[Recipient's Law Firm]  
[Recipient's Address]

**Re: [Case Name] / [Case Number]**

**Subject: Meet and Confer Regarding Intent to File Motion to Strike Sham Pleadings**

Dear [Opposing Counsel's Name],

This letter serves as a formal meet and confer effort pursuant to [State/Local Rule Number] regarding the [Title of Pleading, e.g., Complaint/Answer] filed on [Date].

Upon review of the record, we have determined that certain allegations contained in the [Pleading Name] are "sham" allegations. Specifically, the following portions are demonstrably false and/or flatly contradict prior sworn testimony or judicial admissions without explanation:

- **Pleading Allegation:** [Identify Paragraph Number/Text]  
**Contradictory Evidence:** [Reference Deposition Page/Exhibit/Prior Pleading]
- **Pleading Allegation:** [Identify Paragraph Number/Text]  
**Contradictory Evidence:** [Reference Deposition Page/Exhibit/Prior Pleading]

Under [Applicable Statute/Case Law, e.g., the Sham Pleading Doctrine], a court may strike pleadings that are shown to be a sham, intended to delay the proceedings, or which contain allegations that the party knows to be false. The contradictions identified above are irreconcilable and cannot be cured by amendment.

We request that you voluntarily withdraw or amend the [Pleading Name] to remove these sham allegations by [Deadline Date]. If you decline to do so, we will proceed with filing a formal Motion to Strike. In that event, we will also seek an award of attorney's fees and costs incurred in bringing the motion.

Please let me know your position on this matter no later than [Time] on [Date]. I am available to discuss this by telephone if you believe a conversation would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]