

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

[Date]

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

Re: [Case Name], Case No. [Case Number] - Meet and Confer Regarding Defendant's Anticipated Motion to Dismiss

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number, e.g., Local Rule 7.1], I am writing to meet and confer regarding Defendant [Name of Defendant]'s intent to file a Motion to Dismiss the Complaint for failure to state a claim upon which relief can be granted under [Federal/State] Rule of Civil Procedure 12(b)(6).

Defendant believes that the Complaint is legally deficient for the following reasons:

- **[Count/Claim 1]:** [Briefly describe legal deficiency, e.g., failure to allege specific facts showing a breach of contract].
- **[Count/Claim 2]:** [Briefly describe legal deficiency, e.g., the claim is barred by the applicable statute of limitations].
- **[General Deficiency]:** [e.g., The Complaint fails to meet the pleading standards set forth in Twombly and Iqbal].

The purpose of this letter is to determine whether Plaintiff is willing to voluntarily dismiss the deficient claims or file an amended complaint to address these issues, thereby avoiding the need for motion practice.

Please let me know by [Date/Time] if you are willing to amend the Complaint or if you wish to schedule a call to discuss these issues further. If we cannot reach an agreement, Defendant intends to file the Motion to Dismiss by [Filing Deadline].

I look forward to hearing from you.

Sincerely,

[Your Signature]
[Your Printed Name]