

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

[Date]

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

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

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number, if applicable], I am writing to meet and confer regarding Defendant's intention to file a Motion to Dismiss for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1).

Based on our review of the Complaint, it is our position that this Court lacks subject matter jurisdiction over the claims asserted because:

- [Point 1: e.g., Lack of diversity of citizenship as both parties are residents of the same state.]
- [Point 2: e.g., The amount in controversy does not exceed the statutory threshold of \$75,000.]
- [Point 3: e.g., The claims do not arise under federal law, and there is no federal question jurisdiction.]
- [Point 4: e.g., The Plaintiff lacks Article III standing as no concrete injury has been alleged.]

In light of these jurisdictional defects, we request that you voluntarily dismiss this action. If you are unwilling to do so, we are available to discuss these issues telephonically on [Date] at [Time] to determine if a resolution can be reached without the need for motion practice.

Please let me know if you are available at that time or suggest an alternative time for us to speak. If we are unable to reach an agreement, we intend to file our Motion to Dismiss on or before [Date].

Sincerely,

[Your Signature]  
[Your Printed Name]