

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

[Date]

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

Re: [Case Name]; Case No. [Case Number]

Subject: Meet and Confer Regarding Forthcoming Motion to Dismiss for Improper Venue

Dear [Opposing Counsel Name],

Pursuant to [Cite Local Rule or Civil Procedure Rule], I am writing to meet and confer regarding a Motion to Dismiss for Improper Venue that [Defendant's Name] intends to file in the above-referenced matter.

We believe that venue is improper in the [Current Court Name] because [State primary reason, e.g., none of the defendants reside in this district and no substantial part of the events occurred here]. Specifically, under [Cite Statute, e.g., 28 U.S.C. § 1391], the proper venue for this action is [Proposed Correct Venue] because [Provide brief factual/legal basis].

In the interest of judicial economy and to avoid unnecessary litigation expenses, we request that you voluntarily dismiss this action or agree to stipulate to a transfer of this case to the [Proposed Correct Venue].

Please let me know by [Date/Time] whether you will agree to the requested relief. If we cannot reach an agreement, we will proceed with filing our motion and will seek any available relief or costs associated with the filing.

I am available to discuss this matter via telephone at [Your Phone Number] on [Date] at [Time].

Sincerely,

[Your Signature]

[Your Printed Name]
Counsel for [Defendant's Name]