

[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]

LEGAL MEET AND CONFER PURSUANT TO [LOCAL RULE/PROCEDURE]

Dear [Opposing Counsel Name],

I represent [Defendant Name] in the above-referenced matter. I am writing to meet and confer in good faith regarding Defendant's intention to file a Motion to Dismiss the Complaint pursuant to [Applicable Rule, e.g., FRCP 12(b)(6)].

Based on our review of the Complaint and relevant public records, it appears that the Plaintiff's claims are barred by the applicable statute of limitations. Specifically:

- The causes of action alleged in the Complaint arose on [Date of Incident/Breach].
- The applicable statute of limitations for these claims is [Number] years pursuant to [Citing Statute/Code].
- The statutory period expired on [Date of Expiration].
- The Complaint was not filed until [Date of Filing], which is [Number] days/months after the deadline.

There appears to be no legal basis for tolling or an extension of the limitations period. As a result, the Complaint fails to state a claim upon which relief can be granted as a matter of law.

To avoid unnecessary motion practice and the expenditure of judicial resources, we request that you voluntarily dismiss the Complaint with prejudice. Please let me know by [Time] on [Date] if you are willing to dismiss the action.

If we do not receive a response or a voluntary dismissal by that time, we will proceed with filing the Motion to Dismiss and will seek all available remedies, including any applicable costs or fees.

I am available to discuss this matter via telephone at your earliest convenience if you believe a conversation would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]