

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

[Date]

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

RE: [Case Name]; Case No. [Case Number] - Meet and Confer Regarding Motion to Dismiss Pursuant to Rule 19

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number] and the Federal Rules of Civil Procedure, I am writing to meet and confer regarding a deficiency in the current Complaint. Specifically, [Defendant Name] intends to file a Motion to Dismiss for failure to join an indispensable party under Rule 12(b)(7) and Rule 19.

Based on our review of the pleadings, [Name of Indispensable Party] is a necessary party to this litigation because [State reason: e.g., the court cannot accord complete relief among existing parties, or the party claims an interest relating to the subject of the action]. Because [Name of Indispensable Party] cannot be joined due to [State reason: e.g., jurisdictional limits], and because their absence is prejudicial to [Defendant/All Parties], this action cannot proceed in equity and good conscience.

The purpose of this letter is to determine whether [Plaintiff Name] will agree to [amend the complaint to include the party / voluntarily dismiss the action without prejudice].

I am available to discuss this matter via telephone on [Date] at [Time]. Please let me know if this time works for you, or propose an alternative time so that we may discuss this in good faith before we seek relief from the Court.

Sincerely,

[Your Signature]

[Your Printed Name]