

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

[Date]

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

**RE: [Case Name] / Case No. [Case Number]**

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number/Code of Civil Procedure Section], I am writing to meet and confer in a good faith effort to resolve the legal deficiencies in the [Complaint/Amended Complaint] prior to Defendant filing a Motion to Dismiss.

Defendant intends to move for dismissal of the following causes of action on the grounds stated below:

**1. [Cause of Action Number and Name]**

[Explain specific deficiency, e.g., failure to exhaust administrative remedies, statute of limitations, or failure to state a claim under Rule 12(b)(6)].

**2. [Cause of Action Number and Name]**

[Explain specific deficiency, e.g., lack of factual allegations to support a claim of discriminatory intent].

We believe these deficiencies cannot be cured by amendment. However, if you are willing to voluntarily dismiss these claims or file a First Amended Complaint that addresses these issues by [Date], we may avoid the necessity of formal motion practice.

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 for us to speak.

We look forward to your prompt response.

Sincerely,

[Your Signature]  
[Your Printed Name]  
Counsel for Defendant [Company Name]