

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Your Email]

[Your Phone Number]

[Date]

[Opposing Counsel Name]

[Opposing Counsel Law Firm]

[Address]

[City, State, Zip Code]

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

Subject: Meet and Confer Regarding Forthcoming Motion to Dismiss (Forum Non Conveniens)

Dear [Opposing Counsel Name],

Pursuant to [Insert Local Rule Number, e.g., Local Rule 7.1], I am writing to meet and confer regarding [Defendant's Name]'s intention to file a Motion to Dismiss the above-referenced action on the grounds of *forum non conveniens*.

Our position is that [Current Court Name] is an inconvenient forum for this litigation. We believe that dismissal or transfer is appropriate based on the following factors:

- **Adequate Alternative Forum:** [Insert Name of Alternative Jurisdiction] provides an adequate and available forum for this dispute.
- **Private Interest Factors:** Relevant evidence, key witnesses, and [Other Factors, e.g., the site of the incident] are located in [Alternative Jurisdiction], making trial in this district significantly burdensome.
- **Public Interest Factors:** This case involves [Insert State/Country] law and the local community in this district has minimal interest in the outcome compared to the alternative forum.

In light of these points, we request that the Plaintiff voluntarily dismiss this action or stipulate to a transfer to [Alternative Jurisdiction].

Please let me know by [Date/Time] if you are willing to stipulate to the dismissal or if you would like to schedule a call to discuss this matter further before we proceed with our formal filing. If we do not hear from you by that time, we will assume the motion is opposed.

I look forward to your response.

Sincerely,

[Your Signature]

[Your Printed Name]