

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

[Date]

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

Re: [Case Name]
Case No.: [Case Number]
Subject: Meet and Confer Regarding Defendant's Proposed Motion for Summary Judgment

Dear [Opposing Counsel Name],

I am writing pursuant to [Local Rule/Code Section] to meet and confer regarding your stated intention to file a Motion for Summary Judgment or Summary Adjudication.

Based on our review of the discovery and evidence to date, we believe there are several triable issues of material fact that preclude summary judgment. Specifically, we dispute the following points:

- [Issue 1: Describe the disputed fact or legal theory]
- [Issue 2: Describe the disputed fact or legal theory]
- [Issue 3: Describe the disputed fact or legal theory]

In light of the evidence regarding [Reference specific evidence, deposition testimony, or documents], the Plaintiff intends to vigorously oppose the motion. We believe a motion at this stage would be a waste of judicial resources and the parties' time.

To avoid unnecessary motion practice, we propose the following:

- [Option 1: A brief stay of the motion to conduct further discovery]
- [Option 2: Narrowing the scope of the motion to specific causes of action]
- [Option 3: Settlement discussions or mediation]

Please let me know by [Date/Time] if you are willing to discuss these issues or if you intend to proceed with the filing. I am available for a phone call on [Date] at [Time] to discuss this further.

Sincerely,

[Your Signature]
[Your Printed Name]
Counsel for Plaintiff