

[Plaintiff's Name or Law Firm]
[Address]
[City, State, Zip Code]
[Phone Number]
[Email Address]

[Date]

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

Re: Meet and Confer Regarding Plaintiff's Anticipated Motion for Summary Judgment

Case Name: [Case Name]
Case Number: [Case Number]

Dear [Counsel Name],

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and [Local Rule Number, if applicable], this letter serves as a formal request to meet and confer regarding Plaintiff's intention to file a Motion for Summary Judgment as to [entire case / specific claims or defenses].

Plaintiff believes that summary judgment is appropriate because there is no genuine dispute as to any material fact regarding the following issues:

- [Issue 1: e.g., Breach of contract liability]
- [Issue 2: e.g., Lack of evidence for Defendant's third affirmative defense]
- [Issue 3: e.g., Calculation of liquidated damages]

The purpose of this conference is to discuss the legal and factual bases for the motion, to determine if any issues can be resolved or narrowed by stipulation, and to discuss a briefing schedule for the court's consideration.

Specifically, we would like to discuss whether Defendant will stipulate to the following facts to streamline the Statement of Undisputed Material Facts:

1. [Fact A]
2. [Fact B]

I am available to meet and confer via telephone or video conference on the following dates and times:

- [Date/Time 1]
- [Date/Time 2]

- [Date/Time 3]

Please let me know which of these times works for you, or propose an alternative time so that we may fulfill our meet and confer obligations prior to the filing deadline.

Sincerely,

[Signature]

[Printed Name]

Counsel for Plaintiff