

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

[Opposing Counsel Name]

[Opposing Law Firm]

[Address]

[City, State, Zip Code]

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

Subject: Rule [Insert Local Rule Number] Good Faith Meet and Confer Regarding Defendant's/Plaintiff's Forthcoming Motion for Summary Judgment

Dear [Opposing Counsel Name],

Pursuant to [Local Rule Number/Court Procedure], I am writing to meet and confer in good faith regarding [Party Name]'s intention to file a Motion for Summary Judgment in the above-referenced matter.

Based on the discovery completed to date, we believe there are no genuine disputes as to any material facts regarding the following issues/claims:

- [Issue/Claim 1]
- [Issue/Claim 2]

Accordingly, we believe [Party Name] is entitled to judgment as a matter of law because [Brief Statement of Legal Basis].

The purpose of this letter is to determine whether you will oppose this motion or if you are willing to stipulate to the dismissal of these claims/defenses to avoid unnecessary litigation and expenditure of judicial resources. Furthermore, we wish to discuss narrowing the scope of the issues to be presented to the Court.

Please let me know by [Date/Time] if you are available for a brief telephonic conference to discuss this matter further. If we cannot reach an agreement, we will proceed with the filing as scheduled.

I look forward to hearing from you.

Sincerely,

[Your Signature]

[Your Printed Name]