

[Your Name]
[Your Law Firm/Company]
[Your Address]
[Your Email]
[Your Phone Number]

[Date]

[Opposing Counsel Name]
[Opposing Law Firm]
[Opposing Counsel Address]

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

Dear [Opposing Counsel Name],

Pursuant to [Local Rule/Code Section], I am writing to meet and confer regarding your proposed Motion for Summary Judgment, which was discussed on [Date of Conversation/Correspondence].

After reviewing your proposed motion and the evidence currently on the record, we believe that summary judgment is inappropriate at this time for the following reasons:

1. **Disputed Material Facts:** There remain genuine disputes of material fact regarding [List specific issues, e.g., liability, damages, or specific events]. Specifically, the testimony of [Witness] and the documents provided in [Exhibit] contradict your position.
2. **Pending Discovery:** Discovery is still ongoing. We have yet to receive responses to [Specific Discovery Requests] or depose [Witness Name], which are essential to developing the facts of this case.
3. **Legal Standard:** Under the applicable law, [Cite specific statute or case], the moving party must prove [Legal Requirement], which we believe cannot be satisfied given the current record.

In the interest of judicial economy and avoiding unnecessary litigation costs, we request that you withdraw your intent to file this motion. If you choose to proceed, please consider this letter as our formal effort to resolve these issues without court intervention.

I am available to discuss this matter further via telephone on [Date] at [Time]. Please let me know if that works for your schedule.

Sincerely,

[Your Signature]
[Your Printed Name]