

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

**Sent via [Email/Legal Mail]**

**RE: [Case Name and Case Number] - Final Meet and Confer Regarding Defendant's/Plaintiff's Motion for Summary Judgment**

Dear [Opposing Counsel Name],

Pursuant to [Insert Local Rule Number, e.g., Local Rule 7-3], I am writing to engage in a final meet and confer regarding [Party Name]'s intent to file a Motion for Summary Judgment. We have previously discussed the merits of this case, but we are providing this final opportunity to resolve the issues before moving for formal adjudication.

Based on the evidence produced during discovery, we believe there is no genuine dispute as to any material fact regarding the following issues:

- [Issue 1: e.g., The Statute of Limitations has expired.]
- [Issue 2: e.g., Plaintiff cannot establish the element of causation.]
- [Issue 3: e.g., The contract contains an express waiver of liability.]

Consequently, we believe [Party Name] is entitled to judgment as a matter of law. We are prepared to file our motion on [Date].

Please let us know by [Time/Date] if you are willing to dismiss the [Claims/Case] with prejudice to avoid the time and expense of further litigation. If you maintain that there are material facts in dispute, please specify those facts so that we may narrow the scope of the issues presented to the Court.

I am available for a brief telephone conference at [Time] on [Date] to discuss this further if you believe it would be productive. Otherwise, we will proceed with the filing as scheduled.

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]