

[Attorney Name]
[Law Firm Name]
[Address]
[City, State, Zip]
[Email Address]
[Phone Number]

[Date]

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

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

Dear [Opposing Counsel Name],

This letter serves as a formal meet and confer regarding Defendant's anticipated Motion for Summary Judgment, or in the Alternative, Summary Adjudication, pursuant to [State/Local Rule Number].

Defendant intends to move for summary judgment on the following grounds:

- [List Cause of Action/Issue 1]: [Briefly state legal/factual basis, e.g., Plaintiff cannot establish the element of causation].
- [List Cause of Action/Issue 2]: [Briefly state legal/factual basis, e.g., The claims are barred by the applicable statute of limitations].
- [List Cause of Action/Issue 3]: [Briefly state legal/factual basis].

Based on the evidence obtained during discovery, including [mention specific depositions or documents], Defendant believes there is no triable issue of material fact and that Defendant is entitled to judgment as a matter of law. We request that Plaintiff voluntarily dismiss the aforementioned claims to avoid unnecessary motion practice and the potential for a request for sanctions or costs.

Please let me know by [Date] if you are willing to dismiss these claims or if you would like to discuss this matter further. If we cannot reach a resolution, we will proceed with filing the motion on [Proposed Filing Date].

I am available to discuss this via telephone on [Date/Time] if you believe a conversation would be productive.

Sincerely,

[Your Signature]

[Your Printed Name]

Counsel for Defendant [Client Name]