

[Your Name/Law Firm]
[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: Meet and Confer Regarding Proposed Motion for Summary Judgment / Lack of Triable Issues

Dear [Opposing Counsel Name],

Pursuant to [Insert Local Rule/Statute, e.g., CCP § 437c or Local Rule], I am writing to meet and confer in a good faith effort to resolve issues regarding the upcoming Motion for Summary Judgment/Adjudication in the above-referenced matter.

After a thorough review of the discovery produced to date, including [mention specific depositions, interrogatory responses, or documents], it is our position that there are no triable issues of material fact as to [mention specific claims, e.g., the Plaintiff's first cause of action for negligence].

Specifically, the evidence establishes the following undisputed facts:

- [Undisputed Fact 1]
- [Undisputed Fact 2]
- [Undisputed Fact 3]

In light of these facts, [Moving Party] is entitled to judgment as a matter of law because [State Legal Reason, e.g., the defendant owed no duty of care/the statute of limitations has expired].

We request that you consider a voluntary dismissal of [the entire action / the specific causes of action mentioned above] to avoid the necessity of formal motion practice and the resulting expenditure of judicial resources and legal fees. If you believe there are material facts in dispute that create a triable issue, please identify them and provide the supporting evidence for our consideration.

Please let me know your position by [Date/Time]. I am available to discuss this further via telephone at your earliest convenience.

Sincerely,

[Your Signature]

[Your Printed Name]