

[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 Stipulation of Facts for Summary Judgment

Dear [Opposing Counsel Name],

I am writing pursuant to [Insert Local Rule, e.g., Local Rule 7.1 / Rule 56] to meet and confer regarding the upcoming Motion for Summary Judgment that [Party Name] intends to file on or before [Date].

In the interest of judicial economy and to narrow the scope of the issues for the Court, I propose that we stipulate to certain material facts that are not in genuine dispute. By agreeing to these facts now, we can reduce the volume of the Separate Statement of Undisputed Material Facts and focus the Court's attention on the legal issues and the truly contested factual matters.

I have attached a "Draft Stipulation of Undisputed Facts" for your review. These facts are based on [refer to specific evidence, e.g., deposition testimony, admissions, or authenticated documents].

Please review the attached list and let me know by [Date] which facts you are willing to stipulate to. If there are minor phrasing changes that would allow you to agree to a specific point, please provide your proposed revisions. Additionally, if you have facts you believe are undisputed and should be added to this stipulation, please send them over for my consideration.

I am available to discuss this further via telephone on [Date/Time] if that would be more efficient.

I look forward to your prompt response.

Sincerely,

[Your Signature]
[Your Printed Name]

Enclosure: Draft Stipulation of Undisputed Material Facts