

[Defendant's Attorney Name]
[Law Firm Name]
[Address]
[City, State, Zip Code]
[Email Address]
[Phone Number]

[Date]

Sent Via Email

[Plaintiff's Attorney Name]
[Law Firm Name]
[Address]
[City, State, Zip Code]

Re: [Case Name]
Case No.: [Case Number]
Subject: Meet and Confer Regarding Joint Case Management Conference Statement

Dear [Plaintiff's Attorney Name],

Pursuant to [Local Rule Number/Federal Rule of Civil Procedure 26], I am writing to provide Defendant's positions for the upcoming Joint Case Management Conference Statement due on [Date].

Defendant's positions regarding the required sections are as follows:

1. Jurisdiction and Service:

[State whether Defendant agrees with jurisdiction or intends to challenge it. Confirm status of service.]

2. Facts and Procedural History:

[Provide Defendant's brief summary of the case and defense theories.]

3. Legal Issues:

[List the primary legal issues from Defendant's perspective, including affirmative defenses.]

4. Discovery Plan:

[Detail proposed limitations, subjects of discovery, and the ESI protocol. Note any objections to Plaintiff's proposed timeline.]

5. ADR/Settlement:

[State Defendant's preferred ADR method: Mediation, Early Neutral Evaluation, or Settlement Conference.]

6. Trial Schedule:

[State Defendant's requested trial date, estimated length of trial, and whether a jury is demanded.]

I have attached a draft of the Joint Statement incorporating these points. Please review and provide your feedback or edits by [Date/Time] so we may finalize the document for filing.

I am available for a telephonic meet and confer on [Date] at [Time] if you wish to discuss these points further.

Sincerely,

[Your Signature]

[Your Printed Name]

Counsel for Defendant [Defendant Name]