

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

[Date]

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

RE: [Case Name]
Case No.: [Case Number]
Subject: Meet and Confer Regarding Discovery Disputes for Joint Case Management Statement

Dear [Opposing Counsel Name],

I am writing pursuant to [Local Rule/Code Section] to meet and confer regarding the outstanding discovery disputes that must be addressed in our upcoming Joint Case Management Conference Statement, currently due on [Date].

Specifically, we have not yet reached a resolution regarding the following items:

- **[Discovery Request Set No. X]:** [Brief description of dispute, e.g., Plaintiff's failure to provide responsive documents to Request for Production No. 5].
- **[Discovery Request Set No. Y]:** [Brief description of dispute, e.g., Defendant's overbroad objections to Interrogatory No. 12].
- **[Deposition Issues]:** [Brief description of dispute, e.g., Disagreement over the date and location for the deposition of Witness Name].

As we are required to provide the Court with a joint statement of all unresolved discovery issues, I propose we discuss these matters on [Date] at [Time] via [Telephone/Video Conference] to determine if we can narrow the scope of these disputes or reach a compromise before filing.

Please let me know by [Date/Time] if the proposed time works for you, or suggest an alternative time so we can fulfill our meet and confer obligations.

Sincerely,

[Your Signature]

[Your Printed Name]