

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

[Date]

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

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

Dear [Opposing Counsel Name],

Pursuant to [Local Rule/Code of Civil Procedure], I am writing to follow up on our conference held on [Date] regarding the upcoming Case Management Conference scheduled for [Date of CMC].

Enclosed/Attached is the initial draft of the Joint Case Management Statement. This draft incorporates the points of agreement reached during our discussion, including:

- Proposed discovery deadlines and cutoff dates;
- Status of service and pleadings;
- Agreement regarding [Specific Topic, e.g., ESI Protocols or Alternative Dispute Resolution];
- [Additional Agreement Point].

I have identified the sections where our positions remain distinct, specifically under the headings [Section Names]. Please review the draft and provide your revisions, comments, or your respective sections of the statement by [Date/Time] so that we may finalize the document for filing by the [Deadline Date] deadline.

If you believe any part of this draft does not accurately reflect our verbal agreement or if you wish to discuss further modifications, please let me know as soon as possible.

I look forward to your prompt response.

Sincerely,

[Your Signature]

[Your Printed Name]
Counsel for [Plaintiff/Defendant]