

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

[Date]

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

**RE: [Case Name] / Case No: [Case Number]**

Dear [Opposing Counsel Name],

I am writing to you in a good faith effort to meet and confer regarding Plaintiff's request for an extension of time to complete expert disclosures. Currently, the deadline for expert disclosures is set for [Current Deadline].

Plaintiff is requesting an extension of [Number] days, which would move the deadline to [Proposed New Deadline]. This extension is necessary due to [State Reason, e.g., unavailability of expert for site inspection / delay in receiving medical records / complexity of technical data].

We believe this request is reasonable and will not result in prejudice to your client, nor will it necessitate a change to the current trial date of [Trial Date]. [Optional: Please also let me know if you would like to move the rebuttal expert disclosure deadline accordingly.]

Please let me know by the close of business on [Date] if you will stipulate to this extension. If we can reach an agreement, I will prepare a formal stipulation for your signature to be filed with the court.

I look forward to hearing from you.

Sincerely,

[Your Signature]  
[Your Printed Name]