

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

[Date]

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

RE: [Case Name / Case Number] - Notice of Intent to File [Type of Motion]

Dear [Counsel Name],

Pursuant to [Local Rule/Procedure], this letter serves as a formal notification regarding the complex motion our office is currently drafting. Below is a highlight of the primary legal and factual issues addressed in the forthcoming filing:

- **Factual Basis:** [Briefly describe the key events or discovery findings necessitating the motion].
- **Legal Grounds:** [Cite specific statutes, case law, or procedural rules being invoked].
- **Relief Requested:** [State clearly what you are asking the court to order].
- **Complexity Factors:** [Note if expert testimony, voluminous exhibits, or multi-jurisdictional issues are involved].

In accordance with the duty to confer, we propose the following regarding the motion's briefing schedule:

1. Filing Date: [Proposed Date]
2. Response Deadline: [Proposed Date]
3. Reply Deadline: [Proposed Date]

Please let us know by [Date/Time] if you will consent to the relief requested or if we should proceed with a contested filing. We are available to discuss these highlights via telephone at your earliest convenience.

Sincerely,

[Your Signature]
[Your Printed Name]