

Date: [Insert Date]

To: [Recipient Name/Legal Counsel]

From: [Your Name/Firm Name]

Re: [Case Name/Reference Number]

Dear [Recipient Name],

The purpose of this letter is to outline our proposed case management strategy regarding the above-referenced matter. Our objective is to ensure an efficient resolution while minimizing unnecessary litigation costs.

1. Case Objectives

Our primary goals for this case include:

- [Objective 1: e.g., Settlement within 6 months]
- [Objective 2: e.g., Limitation of discovery scope]

2. Discovery Plan

We propose the following timeline and scope for discovery:

- Exchange of initial disclosures by: [Date]
- Completion of written discovery by: [Date]
- Deposition schedule to be finalized by: [Date]

3. Motion Practice

We anticipate filing the following motions to narrow the issues for trial:

- [Type of Motion: e.g., Motion for Summary Judgment]
- [Type of Motion: e.g., Motion to Compel]

4. Alternative Dispute Resolution (ADR)

We remain open to early mediation or settlement conferences. We suggest scheduling an ADR session on or before [Date].

5. Communication Protocol

To ensure streamlined progress, all correspondence should be directed to [Name] at [Email Address]. We propose bi-weekly status updates via [Phone/Email].

Please review this strategy and provide your feedback or concurrence by [Date]. We look forward to working toward a productive resolution.

Sincerely,

[Your Signature]
[Your Printed Name]
[Your Title]