

[Defense Attorney Name]
[Law Firm Name]
[Address]
[City, State, Zip Code]

[Date]

[Plaintiff Attorney Name]
[Law Firm Name]
[Address]
[City, State, Zip Code]

Re: [Case Caption/Style of Case]
Case No.: [Court Case Number]

Dear [Attorney Last Name],

Our office represents the Defendant in the above-referenced matter. This letter serves as a formal inquiry regarding the Plaintiff's efforts to mitigate damages alleged in this action.

As you are aware, a Plaintiff has a legal obligation to take reasonable steps to minimize the losses resulting from the alleged incident. To evaluate the extent of these efforts, please provide the following information and documentation within [Number] days:

- Detailed records of all medical treatment sought, including dates, providers, and reasons for any gaps in treatment.
- Evidence of job search activities, including applications, interviews, and correspondence, if a claim for lost wages or diminished earning capacity is being made.
- Documentation regarding any alternative employment or income sources obtained since the date of the alleged incident.
- Evidence of any repairs or corrective actions taken to prevent further property damage, if applicable.
- A list of any professional advice, training, or rehabilitation the Plaintiff has engaged in to reduce the impact of their alleged injuries.

Failure to provide this information may necessitate further discovery, including depositions specifically focused on mitigation. We request that you supplement your prior discovery responses to include these details.

Thank you for your prompt attention to this matter.

Sincerely,

[Signature]
[Printed Name]
Counsel for Defendant