

Meet and Confer Letter-

I'm communicating over Case Number . I am the Defendant in this matter. Attached, you will find that I have propounded Request for Admissions (DISC-020) and Request for Form Interrogatories (DISC-020). As you know, the Code of Civil Procedure requires answers to be provided within 30 days of service of said documents.

I understand that your office works these matters at volume, and that it may make sense to sort this out ahead of your office's requirement to respond to discovery. Therefore, this communication is an invitation to make an offer. You represent the Plaintiff; therefore, it is incumbent upon the Plaintiff to make an initial offer. I would advise you to make two offers, one as a short-term resolution, involving a full pay-off to take place within three months. And the second, a longer-term payment plan.

Please note that nothing in this communication is admission of anything, nor does this communication in any way impact your office's requirement to answer my discovery requests. After 30 days from service, any answers from your office not yet received will need to be answered without objections thereafter.

I am fully prepared to proceed with an initial meet and confer, and then follow-up with a motion to compel, and/or motion to deem matters admitted in the alternative. Proposing a reasonable and practical offer promptly will eliminate the need for all of that.

Thank you for your anticipated cooperation.

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Matilde Garelik

Defendant in Pro Per