

Instruction: This is a model letter. Adapt to fit your facts and circumstances.

D A T E

N A M E
C O M P A N Y
A D D R E S S L I N E
C I T Y , S T A T E Z I P C O D E

Re: N A M E vs. N A M E.; **County Circuit Court No.**

Dear Judge N A M E:

The purpose of this letter is to briefly respond to the Response filed by N A M E ("N A M E") in connection with the Motions for Summary Judgment filed by N A M E. While I am not sure that a co-defendant has the right to object to a Motion for Summary Judgment against the Plaintiff, absent the existence of a cross-claim, it appears that the material facts which N A M E's alleges to be in dispute relate to issues solely between N A M E's and N A M E. I do not believe that there is anything contained in the Response of N A M E's or the other pleadings in this matter which dispute the fact that N A M E sold the note and security agreement to N A M E more than 2 1/2 years before the alleged trespass occurred, and N A M E had no connection with the note, security agreement or collateral at any time after D A T E . In particular, there is no dispute as to the fact that N A M E was not involved in any way with the decision to repossess the mobile home or any actions taken in connection with said repossession.

My understanding that the dispute of facts alleged by N A M E's relates solely to issues between N A M E and N A M E's was verified by a telephone conversation I had with N A M E, the attorney for N A M E's shortly after receiving the Response which N A M E filed. In our conversation, N A M E confirmed to me that the Response that she filed on behalf of N A M E was not intended to indicate that any dispute as to material facts existed with regard to N A M E. Based on my conversation with N A M E, it is my understanding that N A M E has no basis for disputing N A M E's Motion for Summary Judgment.

Again, we respectfully request that N A M E's Motion for Summary Judgment be granted. Based on the undisputed facts, there is no theory under which N A M E could be liable to the Plaintiff for the alleged trespass.

Sincerely,

N A M E

BY:

N A M E

pc: :
N A M E