

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MEET AND CONFER REQUIREMENTS

The parties shall conduct substantive verbal communications. Exchanges of letters or e-mails are insufficient. A report that opposing counsel was not available or that the parties made reasonable efforts is likewise insufficient. If the parties cannot reach a resolution that eliminates the need for any of the above-mentioned motions, counsel for the moving party shall include, along with the motion, a certification that the parties met and conferred regarding the alleged pleading deficiencies or matter sought to be stricken.

The Court will deny any 12(b)(6), (e) or (f) motion or discovery motion that fails to conform with these requirements.

Sample certification:

The undersigned counsel certifies that on insert date the parties did meet and confer in an attempt to resolve list motion or topic that was addressed. As this matter was unable to be resolved through substantive verbal communications the attached Motion is being filed.

Each counsel should sign and date the certification.