

MEMORANDUM

To: Jane Doe, Senior Partner

From: John Smith, Associate

Date: June 5, 2024

Re: Statement of Facts “ABC Corp. vs. XYZ Ltd.

STATEMENT OF FACTS

1. ABC Corp. (“ABC”) is a corporation registered in Ontario, engaged in the manufacturing of electronic components.
2. On January 10, 2023, ABC entered into a supply contract with XYZ Ltd. (“XYZ”), a distributor based in Toronto, for the delivery of 1,000 units of microchips at an agreed price.
3. The contract stipulated that delivery would occur no later than February 28, 2023, with payment terms set at thirty (30) days from the invoice date.
4. ABC delivered the first shipment of 500 units on February 15, 2023. Subsequently, on March 2, 2023, a second shipment of 500 units was delivered.
5. XYZ issued partial payment of 50% for the first shipment but failed to remit further payments for the remaining balance and second shipment, citing alleged defects in some of the microchips.
6. ABC requested written documentation of the alleged defects; however, XYZ did not provide any supporting evidence or return the disputed products.
7. On April 12, 2023, ABC sent a formal demand letter, seeking full payment and offering to inspect or replace any defective products.
8. As of this date, XYZ has not responded to the demand letter or provided settlement of outstanding invoices.

Important Notes:

- Present only relevant background facts, avoiding argument or opinion.
- Facts should be clear, concise, and chronologically organized.
- A statement of facts is neutral and objective, forming the foundation for legal analysis.
- Reference parties and documents properly for clarity and precision.
- Always verify factual accuracy before finalizing the memorandum.