

**[JOINT] MOTION FOR TELECONFERENCE
TO RESOLVE [PROTECTIVE ORDER or DISCOVERY] DISPUTE**

[Name or Names of parties] respectfully moved this Court to schedule a teleconference to address outstanding disputes regarding discovery matters.

As a result of a previous teleconference with Chambers, the parties will provide submissions and present their respective positions consistent with the Court's Order on Discovery Matters during a teleconference on **[date and time]** with counsel for **[party]** to initiate the call.

Date: