

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

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

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

Dated: