

**[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 the following **[discovery / protective order]** matters:

- **[LIST ISSUES TO BE RESOLVED]**

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date(s): **[LIST DATE(S)]**.

Delaware Counsel:

[LIST COUNSEL]

Lead Counsel:

[LIST COUNSEL]

The parties are available for a teleconference on the following dates: **[LIST THREE DATES]**.