

**JOINT MOTION FOR TELECONFERENCE
TO RESOLVE PROTECTIVE ORDER DISPUTE**

[Names of parties] respectfully move this Court to schedule a teleconference to address an outstanding dispute regarding the drafting of a protective order.

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

Date: