

**MOTION FOR TELECONFERENCE TO RESOLVE
[DISCOVERY/PROTECTIVE ORDER] DISPUTES**

[PARTY] respectfully moves 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]**.