

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

[PLAINTIFF],)
)
Plaintiff,)
)
v.) C.A. No. _____
)
[DEFENDANT],)
)
Defendant.)

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

[PARTY] respectfully moves this Court to schedule a teleconference to address outstanding disputes regarding the following [discovery/protective order] matters:

- [list of 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 dates: [list date(s) and amount of time spent on each date].

Plaintiff's Counsel:

Delaware Counsel: [list counsel]

Lead Counsel: [list counsel]

Defendant's Counsel:

Delaware Counsel: [list counsel]

Lead Counsel: [list counsel]

The parties are available for a teleconference on the following dates: [list three proposed dates].

This dispute is the [indicate whether first, second, etc.] time that a discovery or protective order dispute has been brought before the Court.