

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

[PLAINTIFF],)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 00-0000-XXX-JLH
)	
[DEFENDANT],)	
)	
Defendant.)	

**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]**.