

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

FEDERAL ENERGY REGULATORY COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civ. A. No. 3:15-cv-00452 (MHL)
	:	
POWHATAN ENERGY FUND, LLC, ET AL.,	:	
	:	
Defendants.	:	
	:	
	:	

**SECOND CONSENT MOTION TO MODIFY SUBPOENA RESPONSE SCHEDULE
FOR NON-PARTY PJM INTERCONNECTION, L.L.C.**

The parties and non-party PJM Interconnection, L.L.C. (“PJM”) consent to and ask the Court to modify the schedule for PJM’s response to defendants’ subpoena, as previously approved in the Court’s March 1, 2021 order (ECF No. 164). In particular, the parties and PJM seek to extend the deadline for PJM to produce responsive documents to March 24, 2021, to allow the parties to reach agreement about a proposed protective order. PJM agrees that it will agree to continue to work toward completing production, if additional follow up is needed, until the end of written discovery on April 23, 2021. PJM further agrees that it will not object should defendants or FERC seek leave of court to extend the document production schedule.

Respectfully Submitted,

/s/ Robert W. Warnement

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*Attorneys for Federal Energy Regulatory
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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, I filed the foregoing motion with the Clerk's Office, using the CM/ECF system, which will send a notification of such filing to counsel of record in this matter.

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