

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

FEDERAL ENERGY REGULATORY COMMISSION,)	
)	
Plaintiff,)	Civil Action No. 3:15-cv-00452 (MHL)
v.)	
)	
POWHATAN ENERGY FUND, LLC, HOULIAN “ALAN” CHEN, HEEP FUND, INC., and CU FUND, INC.)	
)	
Defendants.)	
)	

CONSENT MOTION TO MODIFY DEFENDANTS’ DISCOVERY DEADLINE

Defendants Powhatan Energy Fund, LLC, Houlian “Alan” Chen, HEEP Fund, Inc., and CU Fund, Inc. (collectively, “Defendants”) move to modify the schedule for Defendants to respond to Plaintiff’s discovery requests, as established in the Court’s December 21, 2020 order (ECF No. 160) seven days from March 24, 2021 to March 31, 2021. Plaintiff Federal Energy Regulatory Commission consents to the requested relief on the condition that its deadline is extended equally. Defendants submit this proposed deadline to allow for limited additional time to respond to Plaintiff’s discovery requests while preserving adequate time within the present schedule to resolve any disputes between the Parties regarding written discovery, should they arise. Defendants do not seek nor plan to seek alteration of the April 23, 2021 deadline for the close of written discovery.

Respectfully Submitted,

/s/ Robert W. Warnement

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Dated: March 17, 2021

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*Attorneys for Federal Energy Regulatory
Commission*

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 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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