

**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-MRC
v.)	
)	
POWHATAN ENERGY FUND, LLC,)	
HOULIAN "ALAN" CHEN,)	
HEEP FUND, INC., and)	
CU FUND, INC.,)	
)	
Defendants.)	
)	

**CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE
FEDERAL ENERGY REGULATORY COMMISSION'S MOTION FOR A
PROTECTIVE ORDER**

COMES NOW, Defendant Powhatan Energy Fund, LLC ("Powhatan"), with the consent of Plaintiff Federal Energy Regulatory Commission ("FERC"), and moves this Court for the entry of an Order allowing a four (4) day extension of time to respond to FERC's Motion for a Protective Order, and in support thereof states as follows.

1. On December 13, 2021, FERC filed a Motion for a Protective Order with regards to a subpoena issue by Powhatan to Google, LLC. ECF No. 268.
2. Pursuant to Local Rule 7(F)(1), Powhatan's opposition is due in 14 calendar days, or on December 27, 2021.
3. December 27, 2021 is the Monday after Christmas, Saturday, December 25, 2021.
4. Counsel for Powhatan requests a brief four (4) day extension of time until December 31, 2021, to file its opposition due to the holiday and associated travel.

5. No other requests for an extension of time to respond to FERC's Motion for a Protective Order have been sought or granted.

6. No party will be prejudiced by granting this Motion and the ultimate resolution of this matter will not be delayed.

7. FERC has provided Google, LLC a copy of the filed protective order.

WHEREFORE, Defendant Powhatan Energy Fund, LLC, respectfully requests that the Court enter an Order allowing Powhatan until December 31, 2021 to file an opposition to FERC's Motion for a Protective Order (ECF No. 268).

/s/ Jeffrey Brundage

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CERTIFICATE OF SERVICE

I certify that on December 16, 2021, I filed the foregoing with the Court's CM/ECF system, which caused a copy to be served on counsel of record for all parties to this action.

/s/ Jeffrey Brundage

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