

**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 A ONE-WEEK POSTPONEMENT OF THE JANUARY 13,
2022 STATUS CONFERENCE**

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 postponing the January 13, 2022, status conference for one-week until January 20, 2022, or such other time as may be convenient for the Court, and states as follows:

1. On November 5, 2021, FERC filed a Motion for a Protective Order ("Motion") with regards to a subpoena issued by Powhatan for FERC's FED. R. CIV. P. 30(b)(6) deposition. ECF No. 251.

2. The parties briefed the matter and the Court held a hearing on December 14, 2021. The Court took the Motion under advisement. ECF Nos. 270, 271.

3. The Court had a follow-up status conference on the Motion on December 28, 2021. The Court found significant progress had been made in resolving the Motion and granted the

parties additional time to resolve the Motion and set a status conference for January 13, 2022. ECF No. 281.

4. Lead counsel for Powhatan on this issue has been unable to engage in further discussions with FERC on the Motion and stipulations due to illness.

5. Counsel for Powhatan, with the consent of counsel for FERC, respectfully requests the Court allow the parties one additional week to attempt to resolve the Motion without needing to burden the Court.

6. No other requests for a postponement of this status conference have been made or granted.

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

WHEREFORE, Defendant Powhatan Energy Fund, LLC, respectfully requests that the Court enter an Order postponing the January 13, 2022 status conference for one-week, or such other time that may be convenient for the Court.

Dated: January 7, 2022

Respectfully Submitted,

/s/ Jeffrey Brundage

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CERTIFICATE OF SERVICE

I certify that on January 7, 2022, 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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