

privilege, and the deliberative process privilege. Accordingly, as permitted under the Court's Initial Pretrial Order and Rule 37(a) of the Federal Rules of Civil Procedure, FERC respectfully requests that, following the filing of a joint discovery chart on FERC's objections, the Court issue a protective order barring Defendants' noticed deposition. FERC will file the Court's discovery dispute chart on or before June 22, 2021.

The parties met and conferred the morning of June 8, 2021 but were unable to successfully resolve this dispute. FERC certifies that it will make a good faith effort to resolve the disputes listed above and that it will continue to work cooperatively with Defendants towards a possible resolution of these issues.

FEDERAL ENERGY REGULATORY COMMISSION

By its attorneys,

Dated: June 8, 2021

_____/s/_____
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CERTIFICATE OF SERVICE

I certify that on June 8, 2021, I filed the foregoing notice using the CM/ECF system, which will send a notification of such filing to counsel of record in this matter.

_____/s/_____
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