

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

BLUE FLAME MEDICAL LLC,

Plaintiff,

v.

CHAIN BRIDGE BANK, N.A.,
JOHN J. BROUGH, and
DAVID M. EVINGER,

Defendants.

Civil Action No. 1:20-cv-00658 (LMB/IDD)

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

**JPMORGAN CHASE BANK, N.A.’S NOTICE OF MOTION TO FILE AUDIO
RECORDING SUPPORTING MOTION FOR SUMMARY JUDGMENT UNDER
PROVISIONAL SEAL**

Notice is hereby given that Third-Party Defendant JPMorgan Chase Bank, N.A. (“JPMC”) will file a Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal, which seeks to file under provisional seal the following:

one audio recording of a call between Heather Schoeppe (Chain Bridge) and Joanna Williamson (Chain Bridge) ending on March 25, 2020 at 4:30 p.m. EDT, produced by Chain Bridge, bearing Bates number CBB00002797.

In support of this position, JPMC states the following. Under Local Civil Rule 5(C), parties and non-parties may submit memoranda in support of or in opposition to the Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal within

seven days after the filing of the Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal, and parties may designate all or part of such memoranda as confidential. Any person objecting to the Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal must file an objection with the Clerk within seven days after the filing of the Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal. If no objection is timely filed, the Court may treat the Motion to File Audio Recording Supporting Motion for Summary Judgment Under Provisional Seal as uncontested.

Dated: May 6, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

/s/ Meredith K. Loretta

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CERTIFICATE OF SERVICE

I certify that on this 6th day of May, 2021, I electronically filed the foregoing using the Court's CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ Meredith K. Loretta

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