

**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

DEFENDANTS' MOTION TO DISMISS

In accordance with Federal Rule of Civil Procedure 12(b)(6), Defendants Chain Bridge Bank, N.A., John J. Brough, and David M. Evinger move to dismiss Plaintiff Blue Flame Medical LLC's Complaint for failure to state a claim upon which relief can be granted. In accordance with this Court's Local Civil Rule 7(F)(1), Defendants set forth the authority supporting their motion in the accompanying memorandum.

Date: July 20, 2020

Respectfully submitted,

/s/ Donald Burke

Gary A. Orseck (admitted *pro hac vice*)

Matthew M. Madden (admitted *pro hac vice*)

Donald Burke (VA Bar No. 76550)

Megan D. Browder (admitted *pro hac vice*)

ROBBINS, RUSSELL, ENGLERT, ORSECK,
UNTEREINER & SAUBER LLP

2000 K Street, N.W., 4th Floor

Washington, D.C. 20006

Tel: (202) 775-4500

Fax: (202) 775-4510

dburke@robbinsrussell.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

Peter H. White, Esq.
SCHULTE ROTH & ZABEL LLP
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Tel: 202-729-7476
Fax: 202-730-4520
peter.white@srz.com
Counsel for Blue Flame Medical LLC

/s/ Donald Burke
Donald Burke (VA Bar No. 76550)
ROBBINS, RUSSELL, ENGLERT,
ORSECK,
UNTEREINER & SAUBER LLP
2000 K Street, N.W., 4th Floor
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
dburke@robbinsrussell.com