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**

JOINT MOTION FOR
EXTENSION OF DEADLINES

Pursuant to Rule 7(I) of this Court's Local Civil Rules, Plaintiff Blue Flame Medical LLC and Defendants Chain Bridge Bank, N.A., John J. Brough, and David M. Evinger (together with Plaintiff, the "Parties"), by and through their respective undersigned counsel, respectfully request a 14-day extension of Defendants' time, to and including July 20, 2020, to answer, move to dismiss, or otherwise respond to Plaintiff Blue Flame Medical LLC's Complaint. The Parties further request a 14-day extension of Plaintiff's time, to and including August 17, 2020, to respond to any motion to dismiss filed by Defendants. A proposed order reflecting the requested relief is attached hereto as Exhibit A. In support of this Motion, the Parties respectfully state as follows:

1. Plaintiff's Complaint was filed on June 12, 2020. Each Defendant was served with the Complaint on June 15, 2020. Unless extended, the time within which to answer, move to dismiss, or otherwise respond to the Complaint will expire on July 6, 2020.

2. The Parties respectfully request a 14-day extension of Defendants' time, to and including July 20, 2020, within which to answer, move to dismiss, or otherwise respond to the

Complaint. Additionally, the Parties respectfully request a corresponding 14-day extension of Plaintiff's time, to and including August 17, 2020, to oppose any motion to dismiss filed by Defendants.

3. Defendants' counsel were retained only recently and therefore require additional time to analyze Plaintiff's claims, to investigate the facts at issue in this matter, and to prepare an answer, motion to dismiss, or other response to the Complaint. Additional time is also warranted due to the disruption to working conditions caused by the ongoing COVID-19 pandemic.

4. This Motion is filed before the expiration of Defendants' time to respond to the Complaint.

5. This is the Parties' first request for an extension of time.

6. The Parties waive any hearing on this Motion.

* * * * *

WHEREFORE, the Parties jointly move that the Court enter an order, substantially in the form attached hereto as Exhibit A, granting a 14-day extension of Defendants' time, to and including July 20, 2020, to answer, move to dismiss, or otherwise respond to the Complaint, as well as a 14-day extension of Plaintiff's time, to and including August 17, 2020, to oppose any motion to dismiss filed by Defendants.

Dated: June 23, 2020

Respectfully submitted,

/s/ Donald Burke
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 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:

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