

**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 MOTION TO FILE AN UNREDACTED
MEMORANDUM IN OPPOSITION TO CHAIN BRIDGE BANK, N.A.’S MOTION TO
ESTABLISH THE AMOUNT OF INDEMNIFIED FEES AND EXPENSES TO BE
AWARDED FROM JPMORGAN CHASE BANK, N.A. UNDER PROVISIONAL SEAL**

Under Federal Rule of Civil Procedure 26, Local Civil Rule 5(C), this Court’s September 24, 2020 Order (Dkt. 37), and the Amended Stipulated Confidentiality Agreement and Protective Order (Dkt. 68) (“Protective Order”), Third-Party Defendant JPMorgan Chase Bank, N.A. (“JPMC”) moves the Court for an order granting JPMC’s Motion to File An Unredacted Memorandum in Opposition to Chain Bridge’s Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal. The motion seeks to file under provisional seal an unredacted version of JPMC’s memorandum in opposition to Chain

Bridge's motion. An unredacted version of that memorandum in opposition is being electronically filed under seal concurrently with this Motion. A courtesy copy of the unredacted memorandum in opposition is being delivered to the Court's chambers. JPMC is publicly filing a redacted version of the memorandum concurrently with this Motion.

As set forth in the accompanying Memorandum in Support, JPMC files its memorandum in opposition in accordance with Paragraph 7 of the Protective Order because Chain Bridge has designated certain material "Confidential." JPMC takes no position on the designations.

Dated: November 18, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

/s/ Meredith K. Loretta

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JPMorgan Chase Bank, N.A.*

CERTIFICATE OF SERVICE

I certify that on this 18th day of November, 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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