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 ENTRY OF STIPULATED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER

Plaintiff Blue Flame Medical, LLC and Defendants Chain Bridge Bank, N.A., John J. Brough, and David M. Evinger (collectively, the "Parties") hereby request that the Court enter the Parties' Stipulated Confidentiality Agreement and Protective Order, attached hereto as Exhibit A, under Federal Rule of Procedure 26(c) to facilitate discovery and to protect proprietary, confidential, and sensitive information produced in discovery by restricting its dissemination and use. The Parties respectfully submit that, in light of their consent to the requested relief, good cause exists for entry of the Stipulated Confidentiality Agreement and Protective Order.

The Parties waive any hearing on this motion.

Dated: October 5, 2020

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 5, 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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