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**
CHAIN BRIDGE BANK, N.A., Third-Party Plaintiff, v. JPMORGAN CHASE BANK, N.A., Third-Party Defendant.	

CONSENT MOTION TO AMEND
STIPULATED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER

Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC"), submits this consent motion to amend the Stipulated Confidentiality Agreement and Protective Order in this case.

1. On October 7, 2020, this Court entered a Stipulated Confidentiality Agreement and Protective Order (ECF No. 42), governing the confidentiality of discovery material in this case. At that time, this case was a bilateral dispute between Plaintiff Blue Flame Medical LLC ("Blue Flame") and Defendants Chain Bridge Bank, N.A. ("Chain Bridge"), John J. Brough, and David M. Evinger.

2. On October 13, 2020, Third-Party Plaintiff Chain Bridge filed a Third-Party Complaint against JPMC.

3. JPMC is not currently a party to the Stipulated Confidentiality Agreement and Protective Order, and it is therefore not protected or bound by its terms. JPMC therefore requests that this Court amend the Stipulated Confidentiality Agreement and Protective Order to add JPMC as a party thereto and make several other changes.

4. All parties to this action are in agreement that maintaining the confidentiality of certain discovery is necessary in this case, and as such, good cause exists for entry of an amended Protective Order.

5. JPMC, through counsel, consulted with counsel for Chain Bridge and counsel for Blue Flame regarding the requested amendment. On November 16, 2020, both Chain Bridge and Blue Flame, through their respective counsel, consented to the requested relief.

6. JPMC has not previously requested that this Court enter a protective order or amendment thereto. Chain Bridge and Blue Flame have agreed to the requested relief and would not suffer any prejudice by the Court granting JPMC's requested amendment. A hearing is waived on this Consent Motion.

7. A proposed Amended Stipulated Confidentiality Agreement and Protective Order is attached as Exhibit A.

Dated: November 17, 2020

Respectfully submitted,

WILMER CUTLER PICKERING HALE AND DORR LLP

/s/ Meredith K. Loretta
Meredith K. Loretta (92369)
1875 Pennsylvania Ave NW
Washington, DC 20006
Tel.: (202) 663-6981
meredith.loretta@wilmerhale.com

Alan E. Schoenfeld (*pro hac vice*)
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel.: (212) 230-8800
alan.schoenfeld@wilmerhale.com

Attorneys for Third-Party Defendant JPMorgan Chase Bank, N.A.