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

JPMORGAN CHASE BANK, N.A.'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO THIRD-PARTY COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Civil Rule 7.1, Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC") respectfully submits this consent motion for an extension of time (the "Consent Motion") to file an answer or otherwise respond to Third-Party Plaintiff Chain Bridge Bank, N.A.'s ("Chain Bridge Bank") Third-Party Complaint (ECF No. 43), and states as follows:

1. On October 13, 2020, Chain Bridge Bank, N.A. filed its Third-Party Complaint against JPMC.

2. On October 19, 2020, Chain Bridge Bank served JPMC with the Third-Party Complaint.

3. Thus, in accordance with Federal Rule of Civil Procedure 12, the deadline for JPMC to answer or otherwise respond to the Third-Party Complaint is November 9, 2020.

4. JPMC, through its counsel, consulted with counsel for Chain Bridge Bank regarding an extension of time for JPMC to answer or otherwise respond to the Third-Party Complaint. On October 27, 2020, Chain Bridge Bank, through counsel, consented to the requested relief, and the parties agreed to extend the deadline for JPMC to answer or otherwise respond to the Third-Party Complaint by seven days, until November 16, 2020.

5. JPMC believes this short extension will permit it to meaningfully consider how to respond to the Third-Party Complaint.

6. JPMC has not previously requested any extension of time to answer or otherwise respond to the Third-Party Complaint. Chain Bridge Bank has agreed to this extension and would not suffer any prejudice by the Court permitting JPMC the requested extension of time. A hearing is waived on this Consent Motion.

7. A proposed order is attached as Exhibit A.

In consideration of the foregoing, JPMC respectfully moves this Court to extend the time for JPMC to file its responsive pleading until November 16, 2020.

Dated: October 28, 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 pending*)
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.