

**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

The Honorable Leonie Brinkema

CHAIN BRIDGE BANK, N.A.

Counterclaim Plaintiff,

V.

BLUE FLAME MEDICAL LLC

Counterclaim Defendant.

**PLAINTIFF/COUNTERCLAIM DEFENDANT'S
MOTION TO DISMISS COUNTERCLAIMS**

In accordance with Federal Rule of Civil Procedure 12(b)(6), Plaintiff/Counterclaim Defendant Blue Flame Medical LLC moves to dismiss Defendant/Counterclaim Plaintiff Chain Bridge Bank, N.A.'s Counterclaims for failure to state a claim upon which relief may be granted. In accordance with this Court's Local Civil Rule 7(F)(1), Plaintiff/Counterclaim Defendant sets forth the authority supporting its motion in the accompanying memorandum.

Dated: October 20, 2020

Respectfully submitted,

/s/ Peter H. White

Peter H. White, Esq. (VSB # 32310)
Jason T. Mitchell (admitted *pro hac vice*)
Gregory Ketcham-Colwill (admitted *pro hac vice*)
SCHULTE ROTH & ZABEL LLP
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Tel: (202) 729-7476
Fax: (202) 730-4520
pete.white@srz.com
jason.mitchell@srz.com
gregory.ketcham-colwill@srz.com

William H. Gussman, Jr. (admitted *pro hac vice*)
SCHULTE ROTH & ZABEL LLP
919 Third Avenue
New York, New York 10022
Tel: (212) 756-2044
Fax: (212) 593-5955
bill.gussman@srz.com

Counsel for Blue Flame Medical LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2020, I caused the foregoing document to be filed and served electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: October 20, 2020

/s/ Peter H. White

Peter H. White, Esq. (VSB# 32310)
SCHULTE ROTH & ZABEL LLP
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Tel: 202-729-7476
Fax: 202-730-4520
pete.white@srz.com

Counsel for Blue Flame Medical LLC