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.	

JOINT MOTION FOR STIPULATED AGREEMENT REGARDING REMOTE DEPOSITIONS

The parties respectfully submit this Joint Motion for Stipulated Agreement Regarding Remote Depositions.

1. The parties are scheduled to commence depositions this month, with the first currently set for January 11, 2021.

2. All discovery is set to conclude on March 31, 2021. Dkt. 71.

3. The parties are in agreement that a remote deposition protocol is necessary in this case, and as such, good cause exists for entry of the Stipulated Agreement Regarding Remote Depositions.

4. The parties are in agreement that no party would suffer any prejudice from the entry of the Stipulated Agreement Regarding Remote Depositions.

5. The parties waive any hearing on this Joint Motion.

6. A proposed the Stipulated Agreement Regarding Remote Depositions is attached as Exhibit A.

Dated: January 5, 2021

Respectfully submitted,

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