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 COMPLETE DISCOVERY

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") submits this consent motion for an extension of time (the "Consent Motion") to complete discovery, and states as follows:

1. On September 24, 2020, this Court issued a Rule 16(b) Scheduling Order (ECF No. 37), setting forth a January 15, 2021, deadline for all discovery. At the time, this case was a bilateral dispute between Plaintiff Blue Flame Medical LLC and Defendants Chain Bridge Bank, N.A., 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 has filed this same day a consent motion (ECF No. 52) seeking an extension of its time to answer or otherwise respond to the Third-Party Complaint until November 16, 2020.

4. After the filing of its answer or otherwise responding to the Third-Party Complaint, and based on this Court's Rule 16(b) Scheduling Order, JPMC and Chain Bridge will have less than two months to complete fact and expert discovery with respect to Chain Bridge's Third-Party Complaint, which JPMC and Chain Bridge believe is insufficient given the issues in this case, particularly in light of demands of other cases, anticipated scheduling conflicts, and the upcoming holidays. JPMC therefore requests that this Court extend the following: (1) deadline to serve opening expert reports from November 23, 2020, to January 22, 2021; (2) deadline to serve rebuttal expert reports from December 23, 2020, to February 23, 2021; and (3) deadline to conclude all discovery from January 15, 2021, to March 19, 2021.

5. JPMC, through its counsel, consulted with counsel for Chain Bridge and counsel for Plaintiff Blue Flame Medical regarding the requested extension. On October 27, Chain Bridge Bank, through counsel, consented to the requested relief. On October 28, Blue Flame, through counsel, consented to the requested relief.

6. JPMC has not previously requested any extension of discovery. Chain Bridge Bank and Blue Flame have agreed to this extension and would not suffer any prejudice by the Court granting JPMC's 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 discovery deadlines as set forth in paragraph 4 of this Consent Motion.

Dated: October 28, 2020

Respectfully submitted,

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