

**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

CONSENT MOTION

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

CONSENT MOTION TO RESCHEDULE FINAL PRETRIAL CONFERENCE

Pursuant to Rule 7(G) of this Court's Local Civil Rules, Plaintiff Blue Flame Medical LLC, Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A., Defendants John J. Brough, and David M. Evinger, and Third-Party Defendant JPMorgan Chase Bank, N.A. (collectively, the "Parties"), by and through their undersigned counsel, respectfully request a continuance of the Final Pre-Trial Conference currently scheduled for January 21, 2021, to April 8, 2021 (the Thursday of the week following the close of discovery in this case), or any other date after the close of discovery that the Court deems appropriate. A proposed order reflecting the requested relief is attached hereto as Exhibit A. In support of this Motion, the Parties respectfully state as follows:

1. In its Scheduling Order of September 9, 2020, the Court set January 15, 2021, as the date for completion of discovery in this matter and set a Final Pre-Trial Conference for January 21, 2021, to coincide with completion of discovery. *See* Dkt. 33.

2. On December 3, 2020, the Court entered an order extending the deadline for completing discovery to and including March 31, 2021. *See* Dkt. 71.

3. In light of the extension of the discovery period, the Parties respectfully request that the Final Pre-Trial Conference be rescheduled for April 8, 2021 (the Thursday of the week following the close of discovery in this case), or any other date after the close of discovery that the Court deems appropriate.

4. The Parties waive any hearing on this Motion.

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WHEREFORE, the Parties move that the Court enter an order, substantially in the form attached hereto as Exhibit A, rescheduling the Final Pre-Trial Conference from January 21, 2021 to April 8, 2021, or any other date after the close of discovery that the Court deems appropriate.

Dated: January 8, 2021

Respectfully submitted,

/s/ Donald Burke

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