

**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.

**THIRD-PARTY PLAINTIFF CHAIN BRIDGE BANK, N.A.'S
MOTION FOR SUMMARY JUDGMENT AGAINST
THIRD-PARTY DEFENDANT JPMORGAN CHASE BANK, N.A.**

In accordance with Federal Rule of Civil Procedure 56, Third-Party Plaintiff Chain Bridge Bank, N.A. moves for summary judgment against Third-Party Defendant JPMorgan Chase Bank, N.A. Third-Party Plaintiff requests partial summary judgment with respect to liability on Count I of its Third-Party Complaint and entry of a declaratory judgment in its favor on Count II of its Third-Party Complaint, or, in the alternative, partial summary judgment with respect to liability on Count III of its Third-Party Complaint. In accordance with this Court's Local Civil Rule

7(F)(1), Third-Party Plaintiff sets forth the authority supporting its motion in the accompanying memorandum.

As required by this Court's order dated September 24, 2020 (Dkt. No. 37) and Local Civil Rule 7(E), counsel for Third-Party Plaintiff and Third-Party Defendant met and conferred by telephone regarding this motion, but were unable to narrow the areas of disagreement.

WHEREFORE, Chain Bridge Bank, N.A. respectfully requests that this Court (a) enter partial summary judgment in its favor with respect to liability on Count I and enter a declaratory judgment in its favor on Count II of the Third-Party Complaint; or (b) in the alternative, enter partial summary judgment in its favor with respect to liability on Count III of the Third-Party Complaint.

Date: May 6, 2021

Respectfully submitted,

/s/ Donald Burke

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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