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 TO FILE UNDER PROVISIONAL SEAL

Pursuant to Local Civil Rule 5 and the Amended Stipulated Confidentiality Agreement and Protective Order (ECF No. 68) ("Protective Order"), Third-Party Plaintiff Chain Bridge Bank, N.A. respectfully moves for an order allowing the filing of a redacted version of Exhibit 104 to the Declaration of Donald Burke in Support of Defendants'/Third-Party Plaintiff's Memoranda in Opposition to Blue Flame Medical LLC and JPMorgan Chase Bank, N.A.'s Motions for Summary Judgment. Third-Party Plaintiff sets forth the authority supporting its motion in an accompanying Memorandum in Support in accordance with this Court's Local Rules 5 and 7(F)(1).

As described in the Memorandum in Support, Third-Party Plaintiff seeks to file a redacted version of this exhibit because Third-Party Defendant JPMorgan Chase Bank, N.A. has designated portions of this document as "Highly Confidential" under the terms of the Amended Stipulated Confidentiality Agreement and Protective Order (ECF No. 68) entered in this case. Third-Party Plaintiff takes no position on the designation.

Date: May 20, 2021

Respectfully submitted,

/s/ Donald Burke

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 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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