

UNOPPOSED MOTION TO CONTINUE MOTION HEARING
BY PLAINTIFF BLUE FLAME MEDICAL LLC

Plaintiff Blue Flame Medical LLC hereby moves the Court for an order continuing the hearing of: (1) JPMorgan Chase Bank, N.A.’s Motion for Summary Judgment (ECF No. 112); (2) Defendants’ Motion for Summary Judgment (ECF No. 118); (3) Third-Party Plaintiff Chain Bridge Bank, N.A.’s Motion for Summary Judgment Against Third-Party Defendant JPMorgan Chase Bank, N.A. (ECF No. 122); and (4) Plaintiff Blue Flame Medical LLC’s Motion for Partial Summary Judgment (ECF No. 127) (collectively, the “Summary Judgment Motions”) from Friday, June 25, 2021 at 10:00 AM to Friday, July 23, 2021 at 10:00 AM.

1. Counsel for Plaintiff has met and conferred with counsel for Defendants Chain Bridge Bank, N.A., John J. Brough, and David M. Evinger and counsel for Third-Party Defendant JPMorgan Chase Bank, N.A., and they do not oppose the granting of this Motion.
2. Counsel for all parties had previously met and conferred and agreed to the hearing of the Summary Judgment Motions on June 18, 2021. *See* ECF Nos. 114, 121, 124, & 129.
3. On June 1, 2021, this Court entered an Order continuing the hearing of the Summary Judgment Motions to Friday, June 25, 2021 at 10:00 AM. ECF No. 161.
4. Lead counsel for Plaintiff is unavailable on Friday, June 25, 2021 at 10:00 AM and, pursuant to Local Rule 83.1(D), must be present in all appearances before this Court on behalf of Plaintiff.
5. Counsel for Plaintiff has met and conferred with counsel for all parties and the earliest date all counsel are available is Friday, July 23, 2021 at 10:00 AM.
6. The Parties have agreed to waive any hearing on this Motion.
7. A proposed order is attached.

Dated : Washington, D.C.
June 2, 2021

Respectfully submitted,

/s/ Peter H. White

Peter H. White (VA Bar No. 32310)

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Counsel for Plaintiff Blue Flame Medical LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2021, I caused the foregoing document to be filed and served electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: June 2, 2021

/s/ Peter H. White

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