

**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
ESTABLISH THE AMOUNT OF INDEMNIFIED FEES AND EXPENSES TO BE
AWARDED FROM THIRD-PARTY DEFENDANT JPMORGAN CHASE BANK, N.A**

In accordance with this Court's Orders of September 23, 2021 (Dkt. 176) and October 7, 2021 (Dkt. 179), Third-Party Plaintiff Chain Bridge Bank, N.A., moves to establish the amount of indemnified fees and expenses to be awarded from Third-Party Defendant JPMorgan Chase Bank, N.A. 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.

WHEREFORE, Chain Bridge Bank, N.A. respectfully requests that this Court find that Chain Bridge incurred \$5,935,978.52 in fees and expenses as a result of JPMC's cancellation through September 30, 2021.

Dated: October 28, 2021

Respectfully submitted,

/s/ Donald Burke

Gary A. Orseck (*pro hac vice* pending)

Matthew M. Madden (*pro hac vice* pending)

Donald Burke (VA Bar No. 76550)

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Counsel for Third-Party Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 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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