

**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

**Third-Party Plaintiff's and Third-Party
Defendant's Response to Order
Concerning Briefing Schedule on
Third-Party Plaintiff's Motion to Establish
Attorneys' Fees and Expenses**

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

**THIRD-PARTY PLAINTIFF'S AND THIRD-PARTY DEFENDANT'S RESPONSE TO
ORDER CONCERNING BRIEFING SCHEDULE ON THIRD-PARTY PLAINTIFF'S
MOTION TO ESTABLISH ATTORNEYS' FEES AND EXPENSES**

Pursuant to this Court's September 23, 2021 Order (Dkt. 176), Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC") submits the following proposed schedule to brief the amount of attorneys' fees and expenses to be awarded to Third-Party Plaintiff Chain Bridge Bank, N.A. ("Chain Bridge"). Chain Bridge does not object to the proposal, but has advised JPMC that it is prepared to proceed more expeditiously, should the Court so require.

1. Chain Bridge will file its Motion to Establish Amount of Attorneys' Fees and Expenses by October 28, 2021.

2. JPMC will file its Response to Chain Bridge's Motion to Establish Amount of Attorneys' Fees and Expenses by November 18, 2021.

3. Chain Bridge will file its Reply in Support of its Motion to Establish Amount of Attorneys' Fees and Expenses by November 29, 2021.

4. A proposed order is attached as Exhibit A.

Dated: October 7, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

/s/ Meredith K. Loretta

Meredith K. Loretta (92369)
Albinas J. Prizgintas (*pro hac vice*)
Whitney Russell (*pro hac vice*)
1875 Pennsylvania Avenue N.W.
Washington, DC 20006
Tel.: (202) 663-6981
Fax: (202) 663-6363
meredith.loretta@wilmerhale.com

Alan E. Schoenfeld (*pro hac vice*)
Marissa W. Medine (*pro hac vice*)
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel.: (212) 230-8800
Fax: (212) 230-8888
alan.schoenfeld@wilmerhale.com

Felicia Ellsworth (*pro hac vice*)
60 State Street
Boston, MA 02109
Tel.: (617) 526-6000
Fax: (617) 526-5000
felicia.ellsworth@wilmerhale.com

Margarita M. Botero (*pro hac vice*)
1225 17th Street, Suite 2600
Denver, CO 80202
Tel.: (720) 274-3135
Fax: (720) 274-3133
margarita.botero@wilmerhale.com

*Attorneys for Third-Party Defendant
JPMorgan Chase Bank, N.A.*