

**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.

**DECLARATION OF DONALD BURKE IN SUPPORT OF 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.**

I, Donald Burke, state as follows:

1. I am over twenty-one years of age, and I am competent to give this declaration. I have personal knowledge of the facts set forth in this declaration.

2. I am an attorney at Robbins, Russell, Englert, Orseck & Untereiner LLP (Robbins Russell), and counsel for Third-Party Plaintiff Chain Bridge Bank, N.A. (Chain Bridge) in the above-captioned case.

3. I submit this declaration in support of 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 order to place before the Court true and correct copies of certain documents that are relevant to this matter.

4. Attached hereto as Exhibit 1 are billing records from Robbins Russell to Chain Bridge in connection with this matter.

5. Attached hereto as Exhibit 2 are billing records from Weisbrod Matteis & Copley to Chain Bridge in connection with this matter.

6. Attached hereto as Exhibit 3 are billing records from Analysis Group to Chain Bridge in connection with this matter.

7. Attached hereto as Exhibit 4 are billing records from CRI Compliance to Chain Bridge in connection with this matter.

8. My firm has confirmed, based on a reasonably diligent investigation, that Chain Bridge has paid all of the bills found in Exhibits 1-4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 28, 2021
Washington, DC

/s/ Donald Burke
Donald Burke

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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/s/ Donald Burke
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