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 NOTICE OF MOTION TO FILE UNDER SEAL

Notice is hereby given that Third-Party Plaintiff Chain Bridge Bank, N.A. (Chain Bridge) will file a Motion to File Under Seal (Motion) seeking to redact Exhibits 1-4 to the Declaration of Donald Burke in Support of Third-Party Plaintiff's Motion To Establish The Amount Of Indemnified Fees And Expenses To Be Awarded From Third-Party Defendant JPMorgan Chase Bank, N.A. These exhibits contain Chain Bridge's billing records that itemize the fees and expenses incurred by Chain Bridge as a result of JPMorgan Chase Bank, N.A.'s wire cancellation.

In accordance with Local Civil Rule 5(C), Third-Party Plaintiff states the following: All parties and non-parties may submit memoranda in support of or in opposition to the Motion To File Under Seal within seven (7) days after the filing of the Motion, and they may designate all or

part of such memoranda as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on the Motion. Any person objecting to the Motion must file an objection with the Clerk within seven (7) days after the filing of the Motion, and if no objection is filed in a timely manner, the Court may treat the Motion as uncontested.

Dated: October 28, 2021

Respectfully submitted,

/s/ Donald Burke
Gary A. Orseck (*pro hac vice* pending)
Matthew M. Madden (*pro hac vice* pending)
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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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