

**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 (LMB/IDD)

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

**NOTICE OF JPMORGAN CHASE BANK, N.A.'S MOTION TO FILE AN
UNREDACTED MEMORANDUM IN OPPOSITION TO CHAIN BRIDGE BANK,
N.A.'S MOTION TO ESTABLISH THE AMOUNT OF INDEMNIFIED FEES AND
EXPENSES TO BE AWARDED FROM JPMORGAN CHASE BANK, N.A.
UNDER PROVISIONAL SEAL**

Notice is hereby given that Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC") will file a Motion to File An Unredacted Memorandum in Opposition to Chain Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal, which seeks to file under provisional seal an unredacted version of JPMC's memorandum in opposition to Chain Bridge's motion.

Under Local Civil Rule 5(C), parties and non-parties may submit memoranda in support of or in opposition to the Motion to File An Unredacted Memorandum in Opposition to Chain

Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal within seven days after the filing of the Motion to File An Unredacted Memorandum in Opposition to Chain Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal, and parties may designate all or part of such memoranda as confidential. Any person objecting to the Motion to File An Unredacted Memorandum in Opposition to Chain Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal must file an objection with the Clerk within seven days after the filing of the Motion to File An Unredacted Memorandum in Opposition to Chain Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal. If no objection is timely filed, the Court may treat the Motion to File An Unredacted Memorandum in Opposition to Chain Bridge's Motion to Establish the Amount of Indemnified Fees and Expenses to Be Awarded From JPMC Under Provisional Seal as uncontested.

Dated: November 18, 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.*

CERTIFICATE OF SERVICE

I certify that on this 18th day of November, 2021, I electronically filed the foregoing using the Court's CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ Meredith K. Loretta

Meredith K. Loretta
1875 Pennsylvania Avenue N.W.
Washington, DC 20006
Tel.: (202) 663-6981
meredith.loretta@wilmerhale.com