

**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 FILE UNDER SEAL**

Pursuant to Local Civil Rule 5, Third-Party Plaintiff Chain Bridge Bank, N.A. (Chain Bridge) respectfully moves for an order allowing the filing of a redacted version of its Reply in Support of Chain Bridge's Motion To Establish The Amount Of Indemnified Fees And Expenses To Be Awarded From Third-Party Defendant JPMorgan Chase Bank, N.A., and maintaining the unredacted version of Chain Bridge's Reply under permanent seal. Third-Party Plaintiff sets forth the authority supporting its motion in an accompanying Memorandum in Support in accordance with this Court's Local Civil Rules 5(C) and 7(F)(1).

Dated: November 29, 2021

Respectfully submitted,

/s/ Donald Burke

Gary A. Orseck (*pro hac vice*)

Matthew M. Madden (*pro hac vice*)

Donald Burke (VA Bar No. 76550)

ROBBINS, RUSSELL, ENGLERT,

ORSECK & UNTEREINER LLP

2000 K Street, N.W., 4th Floor

Washington, D.C. 20006

Tel: (202) 775-4500

Fax: (202) 775-4510

dburke@robbinsrussell.com

Counsel for Third-Party Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 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:

Meredith K. Loretta
WILMER CUTLER PICKERING HALE & DORR LLP
1875 Pennsylvania Ave NW
Washington, DC 20006
Phone: (202) 663-6981
Email: meredith.loretta@wilmerhale.com
Counsel for Third-Party Defendant JPMorgan Chase Bank, N.A.

Peter H. White, Esq.
SCHULTE ROTH & ZABEL LLP
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Phone: 202-729-7476
peter.white@srz.com
Counsel for Plaintiff Blue Flame Medical LLC

/s/ Donald Burke
Donald Burke (VA Bar No. 76550)
ROBBINS, RUSSELL, ENGLERT,
ORSECK & UNTEREINER LLP
2000 K Street, N.W., 4th Floor
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
dburke@robbinsrussell.com