

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

Blue Flame Medical LLC,
Plaintiff-Appellant,

v.

Chain Bridge Bank, N.A.,
Defendant and Third-Party Plaintiff-Appellee,
John J. Brough; David M. Evinger,
Defendants-Appellees,

v.

JPMorgan Chase Bank, N.A.,
Third-Party Defendant.

No. 21-2218 (L)
(1:20-cv-00658-LMB-IDD)

Blue Flame Medical LLC,
Plaintiff,

v.

Chain Bridge Bank, N.A.,
Defendant and Third-Party Plaintiff-Appellee,
John J. Brough; David M. Evinger,
Defendants,

v.

JPMorgan Chase Bank, N.A.,
Third-Party Defendant-Appellant.

No. 21-2219
(1:20-cv-00658-LMB-IDD)

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 46(c), Kathleen Foley respectfully requests that the Court withdraw her appearance as counsel for Plaintiff-Appellant Blue Flame Medical LLC in these matters, as Ms. Foley will no longer be affiliated with the law firm

Goldstein & Russell, P.C. Plaintiff-Appellant will continue to be represented by Eric F. Citron of Goldstein & Russell, P.C.

Undersigned counsel has informed counsel for Appellant JPMorgan Chase Bank and Appellee Chain Bridge Bank, in accordance with Local Rule 27(a). Both parties consent to the relief sought in this motion.

January 31, 2023

Respectfully submitted,

/s/ Kathleen Foley

Eric F. Citron

Kathleen Foley

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Counsel for Plaintiff-Appellant

Blue Flame Medical LLC

CERTIFICATE OF COMPLIANCE

In accordance with Fed. R. App. P. 32(g)(1), the undersigned certifies that this motion complies with the type-volume limit of Fed. R. App. P. 27(d)(2) because this motion contains 93 words, excluding the parts of the motion exempted by Fed. R. App. P. 32(f).

This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 2016, Times New Roman, 14-pt font.

/s/ Kathleen Foley
January 31, 2023

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system on January 31, 2023. All participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

/s/ Kathleen Foley
January 31, 2023