

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BLUE FLAME MEDICAL LLC	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Action No. 1:20-cv-00658
	)	
CHAIN BRIDGE BANK, N.A.,	)	The Honorable Leonie Brinkema
JOHN J. BROUGH, and	)	
DAVID M. EVINGER,	)	
	)	
<i>Defendants.</i>	)	
	)	
	)	
CHAIN BRIDGE BANK, N.A.	)	
	)	
<i>Third-Party Plaintiff,</i>	)	
	)	
v.	)	
	)	
JPMORGAN CHASE BANK, N.A.	)	
	)	
<i>Third-Party Defendant.</i>	)	
	)	

PLAINTIFF BLUE FLAME MEDICAL LLC'S WITNESS LIST

Pursuant to Rule 26 of the Federal Rules of Civil Procedure and this Court's September 9, 2020 Order (Dkt. No. 33), as modified by this Court on March 30, 2021 (Dkt. No. 80), Plaintiff Blue Flame Medical LLC hereby discloses the following list of witness it intends to or may call to testify at trial. Plaintiff reserves the right to call impeachment and/or rebuttal witnesses that are not disclosed on this list, and to amend, supplement, or otherwise modify this list, including pending the outcome of any pretrial motions or order of the Court. Plaintiff also reserves the right to call witnesses designated or disclosed by Defendants or Third-Party Defendant, as necessary.

Plaintiff also reserves the right to call any witness or witnesses necessary to authenticate and/or establish the manner in which records were kept.

Plaintiff anticipates presenting testimony, either live (“L”) or by deposition (“D”), or both, of the following witnesses at trial:

1. Mike Gula (L)
2. John Thomas (L)
3. Ethan Bearman (L)
4. John Brough (L) (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)
5. David Evinger (L) (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)
6. Heather Schoeppe (L) (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)
7. Maria Cole (L) (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)
8. Claudia Mojica-Guadron (L)¹ (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)
9. Sean O'Malley² (L)
10. Marc Prisament (L)
11. William Baskett (L)
12. Rakesh Korpai (L or D) (by cross-examination during Plaintiff’s case as part of Blue Flame Medical LLC’s case in chief)

¹ Ms. Mojica-Guadron may be contacted through counsel for Defendant Chain Bridge Bank, N.A.

² Sean O'Malley, Marc Prisament, and William Baskett may be contacted through the undersigned counsel.

13. Richard Chivaro (D)
14. Natalie Gonzales (D)
15. Daniel Kim (D)
16. Andrew Sturmfels (D)
17. Michael Wong (D)
18. Henry Huang (L or D)³
19. Any witness listed on Defendants' Witness List/Rule 26(a)(3) Disclosures and/or offered at trial.

If the need arises, Plaintiff may call the following witnesses at trial:

1. Joanna Williamson (L) (by cross-examination during Plaintiff's case as part of Blue Flame Medical LLC's case in chief)
2. Tim Coffey (L or D)
3. Stephanie Daily Smith (D)
4. Suuchi Ramesh (L)
5. William Lee (L)
6. Any witness listed on Defendants' Witness List/Rule 26(a)(3) Disclosures and/or offered at trial.

³ Mr. Huang, whom both Plaintiff and Defendants have sought to depose, has been unable to appear for deposition because he has been located in China for the pendency of this action, where local laws prevent him from testifying, and has been unable to travel outside of China due to travel restrictions imposed by the Chinese Government in response to the COVID-19 pandemic. Plaintiff intends to seek leave from the Court to conduct a deposition of Mr. Huang once such restrictions are lifted, and reserves the right to present his testimony at trial, either live or by deposition, if possible.

Dated: April 15, 2021

Respectfully submitted,

/s/ Peter H. White

Peter H. White (VA Bar No. 32310)

Jason T. Mitchell (*pro hac vice*)

Gregory Ketcham-Colwill (*pro hac vice*)

SCHULTE ROTH & ZABEL LLP

901 Fifteenth Street, NW, Suite 800

Washington, DC 20005

Tel.: (202) 729-7476

Fax: (202) 730-4520

pete.white@srz.com

jason.mitchell@srz.com

gregory.ketcham-colwill@srz.com

William H. Gussman, Jr. (*pro hac vice*)

SCHULTE ROTH & ZABEL LLP

919 Third Avenue

New York, New York 10022

Tel.: (212) 756-2044

Fax: (212) 593-5955

bill.gussman@srz.com

Counsel for Plaintiff Blue Flame Medical LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2021, I caused the foregoing document to be filed and served electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: April 15, 2021

/s/ Peter H. White

Peter H. White, Esq. (VSB# 32310)
SCHULTE ROTH & ZABEL LLP
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Tel: 202-729-7476
Fax: 202-730-4520
peter.white@srz.com

Counsel for Blue Flame Medical LLC