

**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

The Honorable Leonie Brinkema

CHAIN BRIDGE BANK, N.A.

Third-Party Plaintiff,

V.

JPMORGAN CHASE BANK, N.A.

Third-Party Defendant.

PLAINTIFF'S OBJECTIONS TO TRIAL EXHIBIT LISTS OF DEFENDANT/THIRD-PARTY PLAINTIFF CHAIN BRIDGE BANK, N.A. AND DEFENDANTS JOHN J. BROUGH AND DAVID M. EVINGER, AND THIRD-PARTY DEFENDANT JPMORGAN CHASE BANK, N.A.

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(B), as well as 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 ("Plaintiff") respectfully submits its objections to (1) the Exhibit List of Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A. and Defendants John J. Brough and David M. Evinger (collectively, "Defendants") (Dkt. No. 93) ("Defendants' Exhibit List"), and (2) JPMorgan Chase Bank, N.A.'s ("JPMC") Trial Exhibit List (Dkt. No. 90) ("JPMC's Exhibit List").

These objections are made based on information reasonably available to Plaintiff at this time and stage of the proceedings. As additional information becomes available, Plaintiff reserves the right to supplement, revise, waive, or otherwise amend these objections. Specifically, Plaintiff reserves the right to amend or modify any of the objections set forth below on the basis of: (1) any stipulation entered by the Parties; (2) any corrections, revisions, or other changes to the underlying exhibits; (3) any order from this Court; (4) facts as developed at trial; and/or (5) any ruling from this Court concerning admissibility.

Plaintiff reserves the right to file motions *in limine* concerning any exhibits identified by Defendants and/or JPMC. Plaintiff also reserves the right to interpose objections based on authentication and—depending on usage—hearsay, as well as to make foundational objections, where appropriate, as to each document identified by Defendants and/or JPMC unless the document is properly introduced through a witness at trial. Pursuant to, and as permitted by, Rule 26(a)(3)(B) of the Federal Rules of Civil Procedure, Plaintiff reserves the right to make additional objections pursuant to Rules 402 and 403 of the Federal Rules of Evidence.

Further, these objections are made only to the introduction and admission of the documents as affirmative evidence, and Plaintiff reserves the right to use and admit any document listed by Defendants and/or JPMC for impeachment purposes as necessary. Objections to proposed exhibits of Defendants and/or JPMC that are also on Plaintiff's exhibit list are limited to certain potential uses of such proposed exhibits and shall not constitute a waiver of Plaintiff's rights to seek the admission of such exhibit into evidence for other purposes.

For ease of use, the objections asserted are, where appropriate, abbreviated by the number of the Federal Rule of Evidence barring the introduction of the proposed exhibit, as listed in the

chart below. Objections may, in some instances, apply only to certain portions of the document or where the document is used for a specific purpose.

Federal Rule of Evidence Objection	
106	Incomplete
401/402	Relevance
403	Prejudicial/Confusing/Misleading/Cumulative
702/703	Improper Expert Opinion
801/802	Hearsay
901/902	Authenticity

Exhibit Number ¹	Bates Number	Description	Objection(s)
Objections to Defendants' Proposed Exhibits			
DTX001	BFM000163503-514	Email from Marc Serio to Michael Bueche re: Fwd: As Filed with the Committee, with attachment	403; 801/802
DTX002	N/A	Plaintiff's Responses to Defendants' First Set of Interrogatories to Blue Flame Medical LLC	
DTX003	BFM000008866-68	Email from Chad Jones to Michael Jensen with cc: Mike Gula, Bryan Krastins, Kate Arnold, John Thomas re 3m Mask POs?	801/802
DTX004	BFM000008593-94	Email from John Thomas to Jason Lee, Chad Jones, Mike Gula, Bryan Krasins, Kate Arnold, Michael Jensen re 100,000,000 masks sitting at port of long beach – intro	801/802
DTX005	BFM000200058-115	Texts between Matthew Littman and John Thomas	403; 801/802
DTX006	BFM000200119-133	Texts between Betty Yee (California) and John Thomas	801/802
DTX007	BFM000009263-65	Email from Mike Gula to Chad Jones with cc: Michael Jensen, Kate Arnold, John Thomas re Seller PO – Parkland (DRAFT)	401/402; 801/802
DTX008	BFM000115637-41	Email from Bill Simonson to John Thomas re FW: Email Connect – DGS and John Thomas	401/402; 801/802
DTX009	BFM000009832-33	Email from John Thomas to Bill Simonson with bcc: Mike Gula re Medical Supplies Listing with attachment	401/402; 403; 801/802
DTX010	BFM000200135-44	Texts between Michael Wong (California) and John Thom	403; 801/802
DTX011	CBB00002342-43 (CAL-OES-00000010-11)	Email from Abby Browning to Kim Danile, Mitchell Medigovich re specs for COVID-19 supply request with attachment	401/402; 403; 801/802
DTX012	BFM000066185-86	Email from John Thomas to Michael Wong with bcc: Jennilee@blueflame.agency re Medical Supplies Sheet with attachment	401/402; 403; 801/802
DTX013	BFM000066417-27	Email from John Thomas to Jennilee Brown, Ethan Bearman re Fwd: Medical Supplies Sheet	401/402; 403; 801/802
DTX014	BFM000074877	Texts between Betty Yee (California) and John Thomas	401/402; 403; 801/802

¹ The information in the "Exhibit Number," "Bates Number," and "Description" columns has been reprinted as it originally appeared in Defendants' Exhibit List or JPMC's Exhibit List, respectively.

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX015	BFM000012554-60	Email from John Thomas to Jennilee Brown, Ethan Bearman, Mike Gula re Fwd: Medical Supplies Sheet with attachment	401/402; 403; 801/802
DTX016	BFM000116156-62	Email from Michael Wong to John Thomas re Medical Supplies Sheet	401/402; 403; 801/802
DTX017	BFM000012804-05	Email from Mike Gula to John Thomas, Jennilee Brown, Ethan Bearman, Paris Pope re Invoice inventory with attachment	801/802
DTX018	BFM000110967-79	Email from John Thomas to Michael Wong re Medical Supplies Sheet	403; 801/802
DTX019	BFM000066391-92	Email from Ethan Bearman to Mike Gula with cc: Jennilee Brown, John Thomas re Gula make sure the bank knows the wire is coming	801/802
DTX020	BFM000111121-22	Email from John Thomas to Michael Wong re Invoice with attachment	801/802
DTX021	BFM000074887	Texts between Betty Yee (California) and John Thomas	801/802
DTX022	BFM000013558-59	Email from Ethan Bearman to John Thomas, Mike Gula, Jennilee Brown re Latest spreadsheet with attachment	401/402; 801/802
DTX023	BFM000013560-61	Email from Ethan Bearman to Mike Gula, John Thomas, Jennilee Brown re To get to 100MM with attachment	401/402; 801/802
DTX024	BFM000116497-98	Email from Ethan Bearman to John Thomas re Another version of the spreadsheet for Dan Kim with attachment	401/402; 801/802
DTX025	BFM000129957-60	Email from John Thomas to John Thomas re [no re line] with attachment	401/402; 801/802
DTX026	CBB00002221-89 (CAL-DGS-00000195-263)	Email from Ethan Bearman to John Thomas with cc: Michael Wong re Intro – Blueflame Corp Counsel with attachments	106; 403; 801/802; 901/902
DTX027	BFM000072285-86	Email from John Thomas to Michael Wong with cc: Ethan Bearman re Blue Flame Medical N95's	401/402; 801/802
DTX028	BFM000109726-30	Email from John Thomas to Michael Wong with bcc: Ethan Bearman re 100M Mask Order	401/402; 801/802
DTX029	BFM000076870-74	Email from John Thomas to Henry Huang with cc: Ethan Bearman, Wujin@winteam500.com re PO1-6 with attachments	801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX030	BFM000120324-27	Email from Ethan Bearman to Marc Serrio, John Thomas re URGENT PO 1-4 with attachments	401/402; 801/802
DTX031	BFM000125347-48	Email from Suuchi Ramesh to Mike Gula, John Thomas, Ethan Bearman with cc: Victor Cortes, Mark Herman re Please advise ASAP N95s CE (+FDA) certified stock	401/402; 801/802
DTX032	BFM000192584	Email from Marc Serrio to John Thomas, Mike Gula with cc: Ethan Bearman re Cash Balance Down to Minimum Levels	401/402; 403; 801/802
DTX033	N/A	Blue Flame Medical LLC v. Chain Bridge Bank, John Brough, David Evinger Complaint (E.D. Va. 20cv658)	
DTX034	CBB00000523-25	Delaware Certificate of Formation of Blue Flame Medical LLC	401/402
DTX035	BFM000009163-65	Email from Kate Arnold to Mike Gula, Chad Jones with cc: Stacie Monroe, Bryan Krastins, Michael Jensen, vitoc44@gmail.com re West Virginia and Louisiana	401/402; 801/802
DTX036	BFM000011436-45	Email from Mike Gula to Genevieve Hills re FW: Velox Medical Product Inventory	401/402; 801/802
DTX037	BFM000012055-59	Email from Mike Gula to Brian Chatwin with cc: Tom Datwyler re FW: south koren plant [sic]	401/402; 801/802
DTX038	BFM000012733-39	Email from Mike Gula to Michael Jensen with cc: Chad Jones, Kate Arnold, Bryan Krastins re Updated invitation: COVID-19 Supplies @Mon Mar 23, 2020 5:30pm	401/402; 801/802
DTX039	VLX-007876-907	iMessages for (202) 255-9745	401/402; 801/802; 901/902
DTX040	BFM000012837-39	Email from Mike Gula to Paul Sposito re Fwd: COVID help – supplies	401/402; 801/802
DTX041	BFM000013610-11	Email from Henry Huang to Mike Gula re Attachment order 002 revise with attachment	801/802
DTX042	BFM000095501	State of California General Services Procurement Division Purchasing Authority Purchase Order for Blue Flame Medical LLC	801/802
DTX043	CBB00001781-84	Email from Maria Cole to Mike Gula re wire with attachment	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX044	CBB00001518-19	Email from DocuSign System to Maria Cole re Please DocuSign: Blue Flame Medical LLC	801/802
DTX045	CBB00000555-56	Account Agreement for Blue Flame Medical LLC	801/802
DTX046	CBB00002563-71	Email from Mariano Castagnello to Mike Gula re Fwd: need BF Medical EIN/registration with attachments	801/802
DTX047	CBB00001202-03	Email from Tsega Yohannes to Mariano Castagnello re Expected activity	801/802
DTX048	BFM000110311	Email from Mike Gula to Doug Graham re [no re line]	401/402; 801/802
DTX049	BFM000110662-65	Email from Mike Gula to Todd Boulanger re Fwd: email thoughts with attachments	401/402; 801/802
DTX050	CBB00002794	Transcript of call between Mike Gula and Heather Schoeppe	801/802; 901/902
DTX051	CBB00002794	Call between Mike Gula and Heather Schoeppe	801/802
DTX052	CBB00001460-62	Email from Mike Gula to Maria Cole re wire	801/802
DTX053	CBB00001433-36	Email from Mike Gula to Maria Cole re wire	801/802
DTX054	BFM000074101-06	Email from Mike Gula to John Thomas re Contact Info	801/802
DTX055	BFM000202988-3009	Signal Texts between Ethan Bearman, Mike Gula, and John Thomas	401/402; 403; 801/802
DTX056	CBB00001938-39	Email from Chain Bridge Bank Wire Department to Mike Gula re INCOMING WIRE CONFIRMATION (send secure) with attachment	801/802; 901/902
DTX057	CBB00000639	Email from Mike Gula to David Evinger re Coming in. Are you there?	401/402; 403; 801/802
DTX058	BFM000067627-28	Email from Lindsay Angerholzer to lindsay@blueflame.com re COVID supply help	401/402; 801/802
DTX059	BFM000045714-21	Email from Mike Gula to Zach Hargett with cc: Morgan Nichols, Brielle Appelbaum re South Carolina COVID-19 Emergency Supply Collaborative with attachments	401/402; 801/802
DTX060	CBB00002313-32 (CAL-DGS-00000292-311)	Texts between Michael Wong (California) and John Thomas	801/802; 901/902
DTX061	BFM000116128-35	Email from John Thomas to Michael Wong re Medical Supplies Sheet with attachment	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX062	BFM000116274-76	Email from Ethan Bearman to Michael Wong, John Thomas re Bank Wire instructions for Blue Flame Medical LLC with attachment	801/802
DTX063	BFM000111148-50	Email from John Thomas to Michael Wong re Invoice	801/802
DTX064	BFM000116341	Email from John Thomas to Michael Wong with bcc: Jennilee Brown, Mike Gula re Reminder – Documents	801/802
DTX065	CBB00002291-312 (CAL-DGS-00000270-92)	Email from Mathew Littman to Michael Wong re Calif Details with attachments	401/402; 801/802; 901/902
DTX066	BFM000113888-94	Email from John Thomas to Michael Wong re 100M Mask Order	401/402; 801/802
DTX067	CBB00002281-86 (CAL-DGS-00000255-60)	Texts between Michael Wong (California), Dan Kim (California), and John Thomas	403; 801/802; 901/902
DTX068	BFM000206166-87	Executive Employment Agreement between Blue Flame Medical LLC and Ethan Bearman	401/402; 403; 801/802
DTX069	BFM000000675-81	Referral Fee Agreement between Velox Medical and Blue Flame Strategies LLC	401/402; 403; 801/802
DTX070	BFM000198682-700	Group texts between Ethan Bearman and John Thomas	401/402; 801/802
DTX071	BFM000115813-17	Email from Ethan Bearman to Mike Gula with cc: John Thomas re Regarding your line list for N95 Protective Masks and Surgical Masks	403; 801/802
DTX072	BFM000202805-69	Signal texts between Ethan Bearman, Mike Gula, and John Thomas	401/402; 403; 801/802
DTX073	BFM000116277	Email from Ethan Bearman to John Thomas re California Invoice	801/802
DTX074	BFM000066135-36	Email from Ethan Bearman to John Thomas with cc: Jennilee Brown re Possible spreadsheet to send Suuchi after NDA is signed	801/802
DTX075	BFM000116521-22	Email from Suuchi Ramesh to Ethan Bearman, Mark Herman with cc: John Thomas, Victor Cortes, Ingrid Lacourt re Request on N95 Masks	401/402; 801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX076	CBB00001385	Email from Ethan Bearman to Maria Cole with cc: John Thomas, Mike Gula re Blue Flame Medical LLC – Wire Transfer	801/802
DTX077	BFM000000668-74	Referral Fee Agreement between Healthcom Pacific Inc and Blue Flame Strategies LLC	401/402; 403; 801/802
DTX078	BFM000116254-56; 116342-46	Email from Ethan Bearman to Henry Huang with cc: John Thomas, Mike Gula re Healthcom Pacific Inc. Referral Fee Agreement with attachment	401/402; 403; 801/802
DTX079	CBB00002779	Fedwire Funds Processor Completed	801/802; 901/902
DTX080	CBB00002780	Fedwire Funds Processor Completed	801/802; 901/902
DTX081	CBB00002786	Call between Maria Cole and John Thomas	801/802
DTX082	CBB00002787	Call between Maria Cole and John Thomas	801/802
DTX083	CBB00002788	Call between Maria Cole and John Thomas	801/802
DTX084	CBB00002501-505	California warrants for N95 mask purchase	801/802; 901/902
DTX085	BFM000163112-113	Memo from Andrew Sturmfels to Natalie Gonzales authorizing \$465,888,600.00 wire for purchase of N95 masks from Blue Flame Medical	801/802
DTX086	JPMC-00000027-28	Email from Ana Prieto to Natalie Gonzales indicating that wire had been released	403; 801/802; 901/902
DTX087	N/A	Testimony of Fiona Ma at 05/11/2020 hearing before the California State Assembly	401/402; 403; 702/703; 801/802
DTX088	BFM_CA_STO0001 (STO0626-648)	Email from Natalie Gonzales to Amin Pirasteh noting that it's "really weird" neither of them can find reference to Blue Flame Medical on the internet	403; 801/802
DTX089	JPMC-00000135	Email from Natalie Gonzales to Ana Prieto asking whether it's possible to reach out to CBB for an update re the return wire	801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX090	SCO0131-56	Email from Andrew Sturmfels to Karen Ross Greene, Rick Chivaro, Natalie Gonzales, Fee Chang, Monica Cuellar, Andre Rivera, Dan Kim, Allan Watson with cc: Jim Spano, Jutta, Angela Shell, Jason Hollingsworth, Karen Finn, Bill Simonson, Lilian Lee, Coleen Morrow, Bertha Mejia, Jennifer Chavez, Shirley Dong, Roland Mar, Elizabeth Gonzalez, Michael Wong re email chain restored w/all who need to know..	801/802
DTX091	CBB00002699-70	Email from Mike Gula to David Evinger, John Brough re Screenshot 2020-03-25 at 6.26.08 PM with attachment	106; 801/802; 901/902
DTX092	CBB00002686	Email from Mike Gula to David Evinger re Blue Flame Medical / Fighting Coronavirus	401/402; 801/802
DTX093	CBB00002543	Call between David Evinger and Fee Chang	801/802
DTX094	CBB00002545	Call between John Brough, David Evinger, and Tim Coffey	801/802
DTX095	CBB00004445	Handwritten notes of John Brough	106; 801/802; 901/902
DTX096	BFM000013445-48	Email from Mike Gula to John Brough, David Evinger re Contact Info with attachment	403; 801/802
DTX097	CBB00002541	Call between John Brough, David Evinger, and Rakesh Korpall	801/802
DTX098	CBB00002544	Call between John Brough, David Evinger, and Rakesh Korpall	801/802
DTX099	JPMC-00000084-88	Email from Jenifer Robinson to Rakesh Korpall re FW [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments	403; 801/802; 901/902
DTX100	JPMC-00000089-94	Email from Jenifer Robinson to Rakesh Korpall re FW [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments	403; 801/802; 901/902
DTX101	JPMC-00000392-93	Email from Alexander Leonard to Art Neville, Alex Grant with cc: Daniel Wilkening, Brian Page, Rakesh Korpall, June Cantrell, Joshua Pope, Mike Kelly Michael Nevins re Confidential State of California	403; 801/802; 901/902

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX102	JPMC-00000003-5	Email from Fraud Alert to Jenifer Robinson, Rakesh Korpai, Timothy Coffey with cc: Michelle Long re [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID: with attachments	403; 801/802; 901/902
DTX103	CBB00002784	Recording of call to Chain Bridge Bank (Mariano Castagnello) from Tim Coffey requesting to speak to fraud or wire transfer department	801/802
DTX104	JPMC-00000101-05	Email from Tim Coffey to Debra Naughton with cc: Rakesh Korpai) re PRPC case JPM200326-004818 with attachments	106; 801/802; 901/902
DTX105	JPMC-00000386	Email from Fiona Ma to Jamie Dimon with cc; Tim Schaefer, Genevieve Jopanda re Thank You	401/402; 403; 801/802
DTX106	DGS2491-95	State of California Purchasing Authority Purchase Order with attachments	403; 801/802
DTX107	JPMC-00000009	Email from Timothy Coffey to Fraud Alert, Jenifer Robinson, Rakesh Korpai, Michelle Long re [RFI-89021]: EXPEDITE REVIEW/APPROVAL Held Payment >=\$50MM USD CLIENT NAME: CALIFORNIA STATE TREASURER SP CASE ID:	403; 801/802; 901/902
DTX108	JPMC-00000170-76	Email from Timothy Coffey to Debra Naughton with cc: Rakesh Korpai re PRPC case JPM200326-004818 with attachments	106; 403; 801/802; 901/902
DTX109	N/A	Subpoena to Testify at a Deposition in a Civil Action to the California State Controller's Office	401/402
DTX110	SCO1521-80	Texts between Betty Yee (California) and John Thomas	403; 801/802; 901/902
DTX111	DGS5408-09	Email from Mai Chang to Naoko Reese with cc: Thanh Thao Au, Robert Bachiller, Bla Lee, Anthony Cantrell, Tawnya Castro Harris, Samantha Curry, Debra Rossaro, Kristoffer Hernandex, Molly McClure, Patti Moore, Thy Nguyen, Greg Okumura, Tracy Oliver, Tadashi Taira, Nicholas Walls re DENIED SID 0000160359 BLUE FLAME MEDICAL LLC	401/402; 403; 801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX112	BFM000121643-647	PO-20200410-002 dated 4/10/20 from Blue Flame Medical, LLC to Quonset Development Corporation	401/402; 801/802
DTX113	BFM000072442-443	Blue Flame Medical Bulk Price Sheet on 4-09-20	401/402; 801/802
DTX114	BFM000128078-079	Emails between Matthew Hayes (Tennessee) and John Thomas re: [EXTERNAL] Updated Costs And Potential Solutions	401/402; 403; 801/802
DTX115	BFM000063226	Emails between Julia Pickle (Alabama) and Mike Gula	401/402; 403; 801/802
DTX116	BFM000134376	Sales Quote to the State of Colorado	401/402; 801/802
DTX117	BFM000080369	Email from Colorado to John Thomas and Tracy Austin re: Firm Denial – Quote packet received	401/402; 403; 801/802
DTX118	BFM000080065	Email from Ethan Bearman to John Thomas, Michael Collins, Marc Serrio re: Colorado	401/402; 403; 801/802
DTX119	BFM000126777	Purchase Order issued April 9, 2020 to Office of Governor Jay Inslee	401/402; 403; 801/802
DTX120	BFM000126774-779	Email from Ethan Bearman to Elena McGraw re: isolation gown pic/certificate	401/402; 403; 801/802
DTX121	BFM000046448-459	Email from Mike Gula to Bradley Knox (Tennessee) re: WA State COVID-19 Supplies – Isolation Gowns Questions – Time Sensitive	401/402; 403; 801/802
DTX122	BFM000050658-659	Emails between Elena McGrew and Mike Gula re: We want to work with you on price point	401/402; 403; 801/802
DTX123	DGS6516-6518	Dan Kim Typed Noted	401/402; 403; 801/802; 901/902
DTX124	DGS2493	Payee Data Record for Blue Flame Medical	801/802
DTX125	DGS2948-2959	Email from Andrew Sturmfels to Karen Greene Ross, Dan Kim, Jutta Wiechec re: email chain restored w/all who need to know....	403; 801/802
DTX126	DGS0775-0787	Email from Dan Kim to Allan Watson Re: email chain restored w/all who need to know.....	403; 801/802
DTX127	DGS5363-5365	Texts between Dan Kim (California) and John Thomas	401/402; 801/802; 901/902
DTX128	BFM000200134	Texts between Dan Kim (California) and John Thomas	401/402; 801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX129	DGS4966-4980	Email from Karen Greene Ross to Dan Kim Re: email chain restored w/all who need to know...	403; 801/802
DTX130	DGS6030-6049	Email from Dan Kim to Monica Cuella, Andre Rivera, Andrew Sturmfels, Allan Watson Re: email chain restored w/all who need to know....	403; 801/802
DTX131	DGS8016-8021	Chronology of email correspondence and notes taken by Dan Kim	801/802; 901/902
DTX132	BFM000007156	Email from Mike Gula to Mike Gula re: Current contracts 3.17	401/402; 801/802
DTX133	BFM000012806-807	Email from Mike Gula to John Thomas, Jennilee Brown, Ethan Bearman, Paris Pope, RE: Invoice Inventory	401/402; 403; 801/802
DTX134	BFM000012824-825	Email from Mike Gula to Ethan Bearman re: Gula make sure the bank knows the wire is coming	403; 801/802
DTX135	BFM000198724-736	Texts between Matthew Littman, Ethan Bearman, and John Thomas	401/402; 801/802
DTX136	BFM_DGS0294-0322	Ltr. from Jennifer Dauer to Angela Shell (CA Procurement) Re: Purchase Order No. M12948-T6619 to Blue Flame Medical LLC	403; 801/802
DTX137	BFM000162406-07	Emails from Matthew Swift to Michael Gula re: Blue Flame Medical Files Suit Against Chain Bridge Bank.pdf	401/402; 801/802
DTX138	BFM000206162	Video with file name signal-2020-03-25-094152.mp4	401/402; 801/802
DTX139	N/A	Chain Bridge Bancorp, Incorporated 2019 Annual Report	401/402; 801/802
DTX140	N/A	Excerpt from John Brough deposition transcript	106; 403; Improper use of deposition under Fed. R. Civ. P. 32
DTX141	N/A	Excerpt from Bank Secrecy Act/Anti-Money Laundering Examination Manual Appendix F	106; 401/402; 403; 702/703; 801/802
DTX142	N/A	FBI Press Release: FBI Warns Health Care Professionals of Increased Potential for Fraudulent Sales of COVID-19 Related Medical Equipment	106; 401/402; 403; 801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX143	N/A	Fedwire Funds Service Format Reference Guide	106; 401/402; 403; 801/802
DTX144	CBB00002781	Fedwire Funds Processor Message	801/802; 901/902
DTX145	N/A	The ABCs of the UCC by Thomas C. Baxter Jr. et al.	106; 401/402; 403; 702/703; 801/802
DTX146	JPMC-00000533-534	Ltr. from Alan E. Schoenfeld (WilmerHale) to Spencer Walker (California) re: Reservation of Rights Regarding March 26, 2020 Wire Transfer to Blue Flame Medical LLC	401/402; 801/802
DTX147	JPMC-00000535-599	Email from Alan E. Schoenfeld to Spencer Walker re: JPMorgan Chase Bank, N.A. / Notice of Claim, with attachments	401/402; 801/802
DTX148	BFM000047291-92	Assignment, Acknowledge, and General Obligation Pledge with County of San Mateo	401/402; 801/802
DTX149	BFM00032772-773	Emails between Henry Huang and Mike Gula re: URGENT PO 1-4	401/402; 403; 801/802
DTX150	CBB00004468	Silverlake Screenshot of Blue Flame Medical LLC Checking Account	801/802; 901/902
DTX151	SDS000078-143	Text messages between Stephanie Daily Smith and Matthew Littman	401/402; 403; 801/802; 901/902
DTX152	SDS000144-153	Texts between Stephanie Daily Smith and Betty Yee	401/402; 403; 801/802; 901/902
DTX153	BFM000110641	Email from John Thomas to Stephanie Smith re: medical supplies sales sheet	801/802
DTX154	BFM000111228-231	Email from John Thomas to Stephanie Smith re: Fwd: Bank Wire Instructions for Blue Flame Medical LLC	403; 801/802
DTX155	SDS00072-074	Emails between Lee Rosenberg and Stephanie Smith	401/402; 801/802
DTX156	N/A	Ltr. from Amanda Touchton (attorney for Matthew Littman) to Matt Madden (attorney for Defendants) re: Subpoena to Mathew Littman in Blue Flame Medical, LLC v. Chain Bridge Bank, et al.	401/402; 801/802
DTX157	SDS0001-077	Stephanie Smith emails	403; 801/802; 901/902

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX158	BFM000206553-559	Ltr. from Douglas F. Gansler (Cadwalader) to Lauri A. McGuire (Maryland Department of General Services) Re: Blue Flame Medical, LLC – Purchase Order #H00P0601445	401/402; 403; 801/802
DTX159	BFM_CA_DGS6555-6565	California Department of General Services Emails between Michael Wong, Angela Shell, et al.	401/402; 403; 801/802
DTX160	N/A	Federal Reserve Banks Operating Circular No. 6	401/402; 801/802
DTX161	BFM000204231	60 Minutes Video	401/402; 403; 801/802
DTX162	N/A	CBS News Article: Inside the chaotic PPE market where shortages of critical supplies persist	403; 801/802
DTX163	N/A	Audio/Video of California State Assembly Hearing for the Committee on Accountability and Administrative Review	401/402; 403; 801/802
DTX164	CBB00002608	SilverLake Xperience Screenshot of Blue Flame Medical LLC Transaction History	401/402; 801/802; 901/902
DTX165	BFM000002416-430	Blue Flame Medical Presentation	401/402; 403; 801/802
DTX166	CBB00002569-571	State of Delaware Limited Liability Company Certificate of Formation for Blue Flame Medical LLC	401/402
DTX167	CBB00001198-199	State of Delaware Limited Liability Company Certificate of Formation for Blue Flame Strategies LLC	401/402
DTX168	BFM000115483-490	Email from Maria Cole to Michael Gula, cc'ing Mariano Castagnello, Mike Richardson, and Brad Ward, "Re: New Account", with attachments	801/802
DTX169	CBB00001952-62	Email from Michael Gula to Melissa Strano, cc'ing John Thomas, "Fwd: new business", with attachments	801/802
DTX170	CBB00004391-392	Account Agreement between Chain Bridge Bank, N.A. and Blue Flame Strategies LLC	801/802
DTX171	CBB00001574-79	Email from Michael Gula to Maria Cole, cc'ing John Thomas, "NEW business account needed", with attachment	801/802
DTX172	CBB00004380-381	Account Agreement between Chain Bridge Bank, N.A. and Redline Strategies LLC	801/802
DTX173	BFM000137279-280	Email from Michael Gula to Brielle Appelbaum, "Fwd: My memory of the call with Chain Bridge Bank"	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX174	CBB00004463-467	Brough Typed Notes	403; 801/802
DTX175	CBB00002124-125	Email from Allan Watson to Jim Spano et al., "email chain restored w/all who need to know....."	801/802
DTX176	CBB00000728-729	Email from David Evinger to Jennifer Lincoln, John Brough, and Farrukh Memon, cc'ing Wires, "RE: Incoming Large Wire"	403; 801/802
DTX177	CBB00004235-273	Bank Secrecy Act, Anti Money Laundering Control, and Office of Foreign Assets Control Policy, Chain Bridge Bank, N.A.	403; 801/802
DTX178	CBB00004274-276	Suspicious Activities Procedures, Chain Bridge Bank, N.A.	403; 801/802
DTX179	CBB00004302-306	Wire Transfer Procedures, Chain Bridge Bank, N.A.	801/802
DTX180	CBB00004307-09	Funds Availability (Regulation CC) Policy, Chain Bridge Bank, N.A.,	801/802
DTX181	CBB00004277-278	"BSA Policy Review: Questionable and Suspicious Activity Reporting (BSA Policy Pages 32 - 35)," BSA Training – BSA Policy Review, Chain Bridge Bank, N.A.	801/802
DTX182	CBB00002609-610	Funds Availability Disclosure, Chain Bridge Bank N.A.,	801/802
DTX183	BFM000116345-346	First Amendment and Addendum to Referral Fee Agreement between Healthcom Pacific Inc. and Blue Flame Strategies LLC	401/402; 403; 801/802
DTX184	BFM000021076-94	Email from Michael Gula to Julio Cabral re: Medical Supplies – Blue Flame Medical, with attachments	401/402; 403; 801/802
DTX185	BFM000170149-174	Email from Ethan Bearman to Marc Serrio (Blue Flame) re: FW: Wire Info, with Product Reseller Agreement attachments	401/402; 403; 801/802
DTX186	BFM000076873-874	Letter from Great Health to Blue Flame Re: Cancellation of Order Confirmation No. 1001-1004, 1006; Blue Flame Medical as Reseller	801/802
DTX187	CAL-OES- 00000020-026	Emails from Abby Browning to Mike Gula et al re: Updated invitation: COVID-19 Supplies @ Mon Mar 23, 2020 5:30pm – 6:30pm (MDT) (abby.browning@caloes.ca.gov)	801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX188	BFM000066087-088	Email from Kate Arnold (Velox Medical) to Brian Merrick (State of Massachusetts) re: Update on Supply-Urgent	401/402; 801/802
DTX189	BFM000008038-039	Email from Henry Huang to Michael Jensen et al. re: Velox Daily Shipping Request—March 18	401/402; 801/802
DTX190	BFM000011979-982	Texts between Mike Gula and Henry Huang	403; 801/802
DTX191	BFM000012279-285	Email from Suuchi Ramesh to Ethan Bearman et al. RE: RE: Email 2 pricing from Suuchi Inc	801/802
DTX192	BFM000077942-956	Texts between Suuchi Ramesh and Ethan Bearman	801/802
DTX193	BFM000116424-425	Purchase Order from Blue Flame to Suuchi	801/802
DTX194	BFM000013830	Email from Suuchi Ramesh to Mike Gula et al. re: PO Status	801/802
DTX195	BFM000066389-390	Email from John Thomas to Mike Gula et al. re: Invoice Inventory	403; 801/802
DTX196	BFM000116525-527	Email from Suuchi Ramesh to Ethan Bearman re: Request on N95 Masks	403; 801/802
DTX197	BFM000138783-799	Federal Grand Jury Subpoena to Blue Flame Medical, US Attorney's Office, Central District of California	401/402; 403; 801/802
DTX198	BFM000157939-943	Email from Tung Khuu to Michael Skoglund et al re: Blue Flame Medical, LLC PPE Subpoenas and Investigations Additional subpoenas from Maryland and U.S. DOJ – E.D. Virginia, with attachment	401/402; 403; 801/802
DTX199	CBB00002646-648	Ltr. from Frank Pallone, Jr., Diana DeGette, U.S. House of Representatives Committee on Energy and Commerce to Mike Gula	401/402; 403; 801/802
DTX200	CBB00004323-362	Selected Chain Bridge Bank Call Logs	106; 403; 801/802; 901/902
DTX201	CBB00002765-778	Terms and Conditions of Your Account	801/802
DTX202	CBB00001743-747	Emails between Maria Cole and Mike Gula re: wire	801/802
DTX203	N/A	FBI Warns of Advance Fee and BEC Schemes Related to Procurement of PPE and Other Supplies During COVID-19 Pandemic	401/402; 403; 801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX204	N/A	The Financial Crimes Enforcement Network (FinCEN) Encourages Financial Institutions to Communicate Concerns Related to the Coronavirus Disease 2019 (COVID-10) and to Remain Alert to Related Illicit Financial Activity	401/402; 403; 801/802
DTX205	BFM000212491-501	Texts between Matt Littman, Stephanie Daily Smith, and John Thomas	403; 801/802
DTX206	BFM000212479	Texts between Stephanie Smith, John Thomas, and Betty Yee	401/402; 801/802
DTX207	BFM000212468-478	Texts between John Thomas and Stephanie Roberson (California Nurses Association)	401/402; 801/802
DTX208	BFM000212939-964	Texts between John Thomas and Marc Serrio	401/402; 801/802
DTX209	BFM000212912-938	Texts between John Thomas and Henry Huang	401/402; 801/802
DTX210	BFM000212703-733	Texts between Mike Gula, John Thomas, and Henry Huang	801/802
DTX211	BFM000212965-3013	Texts between Matt Littman and John Thomas	403; 801/802
DTX212	BFM000126009-10	Email from Marc Serrio to Henry Huang re: proof of funds for Henry, with attachment	401/402; 801/802
DTX213	N/A	Laurel Rosenhall, Exclusive: California wires mask dealer half a billion dollars, then claws it back, Cal Matters	401/402; 403; 801/802
DTX214	N/A	Tom Hamburger and Juliet Eilperin, Maryland cancels \$12.5 million PPE contract with firm started by GOP operatives, The Washington Post	401/402; 403; 801/802
DTX215	N/A	Tom Hamburger and Juliet Eilperin, Justice Department investigates Blue Flame Medical after claims that it failed to provide masks to Maryland	401/402; 403; 801/802
DTX216	N/A	Kenneth P. Vogel, Firm Set Up by G.O.P. Operatives Under Scrutiny Over Virus Contracts, The New York Times	401/402; 403; 801/802
DTX217	N/A	The Baltimore Sun, Maryland seeks investigation of politically connected company that hasn't delivered masks, ventilators	401/402; 403; 801/802
DTX218	N/A	Brody Mullins and Susan Pulliam, Maryland Cancels Big Coronavirus Mask Order, The Wall Street Journal	401/402; 403; 801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX219	CBB00000655-57	Email from Heather Schoeppe to Maria Cole, John Brough, David Evinger, Mike Richardson re Blue Flame Medical LLC – Wire Transfer	403; 801/802
DTX220	CBB000002529-36	Chain Bridge Bank GL History Print Optical Report OutQ	106; 801/802
DTX221	CBB00001770-72	Email from Maria Cole to Mike Richardson re wire	801/802
DTX222	CBB00002725-29	Email from Peter Fitzgerald to John Brough re \$450 Million wire came in	801/802
DTX223	JPMC-00000123	Email from Rakesh Korpall to Patricia Wiltz re Conversation initiated by rakesh.korpall@jpmchase.com	403; 801/802; 901/902
DTX224	JPMC-00000194-95	Email from June Cantrell to Lisa Lucchese re California State Treasurer's Office (STO) – Wire	403; 801/802
DTX225	JPMC-00000231-32	Email from June Cantrell to Daniel Wilkening re California State Treasurer's Office (STO) – Wire	403; 801/802
DTX226	JPMC-00000239-42	Email from Nikki Ticzon to Rakesh Korpall, Jenifer Robinson, Timothy Coffey, Akhil Kedia re [re line empty] with attachments	403; 801/802
DTX227	JPMC-00000243	Email from Rakesh Korpall to Rakesh Korpall, Timothy Coffey re Conversation with Korpall, Rakesh (CIB OPS, USA)	403; 801/802; 901/902
DTX228	JPMC-00000244	Email from Rakesh Korpall to Timothy Coffey re Conversation initiated by rakesh.korpall@jpmchase.com	403; 801/802; 901/902
DTX229	JPMC-00000461-63	March and April Handwritten notes	106; 403; 801/802; 901/902
DTX230	SCO0221-45	Email from Andrew Sturmfels to Karen Greene Ross, Rick Chivaro, Natalie Gonzales, Fee Chang, Monica Cuellar, Andre Rivera, Kim Daniel, Allan Watson with cc: Jim Spano, Jutta Wiechec, Angela Shell, Jason Hollingsworth, Karen Finn, Bill Simonson, Lilian lee, Coleen Morrow, Bertha Mejia, Jennifer Chavez, Shirley Dong, Roland Mar, Elizabeth Gonzalez, Michael Wong re email chain restored w/all who need to know....	403; 801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
DTX231	CBB00000853-56	Email from Heather Schoeppe to Mike Richardson re Blue Flame Medical incoming wire 450 million	403; 801/802
DTX232	CBB00002795	Call between Mike Gula and Heather Schoeppe	801/802
DTX233	CBB00002797	Call between Heather Schoeppe and Joanna Williamson	801/802
DTX234	CBB00002798	Call between Heather Schoeppe, John Brough, and David Evinger	801/802
DTX235	CBB00001097-101	Email from Maria Cole to Mike Richardson with cc: Heather Schoeppe re Blue Flame Medical incoming wire 450 million	403; 801/802
DTX236	CBB00000761-63	Email from Heather Schoeppe to John Brough with cc: Mike Richardson, Joanna Williamson, David Evinger re Blue Flame Medical incoming wire 450 million	403; 801/802
DTX237	CBB00002673-77	Email from Heather Schoeppe to John Brough, Tsega Yohannes, Betsy Sharon, Nancy Kelly with cc: David Evinger, Tais Ribeiro, Mike Richardson, Joanna Williamson re Contact Info	106; 403; 801/802; 901/902
DTX238	CBB00002649	Wire Transfers Display	801/802; 901/902
DTX239	CBB00001008-29	Email from Mike Richardson to Maria Cole with cc: Heather Schoeppe re Blue Flame Medical incoming wire 450 million with attachment	403; 801/802
DTX240	CBB00000748	Email from John Brough to Jennifer Lincoln, David Evinger, Joanna Williamson, Farrukh Memon, Heather Schoeppe, Mike Richardson with cc: Wires re Incoming Large Wire	403; 801/802
DTX241	CBB00000971-80	Email from Maria Cole to Mike Richardson, Claudia Mojica with cc: Heather Schoeppe, Wires re Blue Flame Medical incoming wire 450 million	106; 403; 801/802; 901/902
DTX242	CBB00000919-29	Email from Maria Cole to Mike Richardson, Thais Ribeiro, Jennifer Lincoln, Claudia Mojica with cc: Heather Schoeppe, Wires re Blue Flame Medical incoming wire 450 million	106; 403; 801/802; 901/902
DTX243	CBB00000718-27	Email from Heather Schoeppe to David Evinger, Mike Richardson, John Brough, Joanna Williamson with cc: Maria Cole re Blue Flame Medical incoming wire 450 million	106; 403; 801/802; 901/902

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX244	CBB00000815-17	Email from Heather Schoeppe to Thais Ribeiro re Please close BlueFlame Accounts	403; 801/802
DTX245	CBB00000527	Email from John Brough to Heather Schoeppe, Mariano Castagnello, Angeli Nanali, Mubeen Baig, Najwa Alwazir, M. Strano, Maria Cole, Mike Richardson, Brad Ward, Sametta Bailey, Pat Collins, Barry Huitema, Marcia Bradford with cc: David Evinger, Betsy Sharon, Tsega Yohannes, Thais Ribeiro re No new accounts for these clients	403; 801/802
DTX246	CBB00002650	Wire Transfers Display	801/802; 901/902
DTX247	CBB00002789	Call between Claudia Mojica-Guadron, John Brough, David Evinger, and Thais Ribeiro	801/802
DTX248	CBB00000640-42	Email from Claudia Mojica to John Brough, David Evinger, Thais Ribeiro re Message from JPMorgan Chase – Large Incoming Wire with attachment	801/802; 901/902
DTX249	CBB00000795-96	Email from David Evinger to Thais Ribeiro, John Brough, Claudia Mojica with cc: Tim Ahmad re Message from JPMorgan Chase – Large Incoming Wire	801/802
DTX250	CBB000002653-54	Wire Transfers Display	801/802; 901/902
DTX251	CBB00000791-94	Email from David Evinger to John Brough, Claudia Mojica, Tim Ahmad with cc: Thais Ribeiro re Message from JPMorgan Chase – Large Incoming Wire	801/802
DTX252	CBB00003573-74	Email from Maria Cole to Mike Gula re wire	801/802
DTX253	CBB00004437	Cell Phone Record for Maria Cole	106; 401/402; 801/802; 901/902
DTX254	CBB00001725-26	Email from Maria Cole to John Thomas with cc: Mike Gula, Mike Richardson re Wire Request Form with attachment	801/802
DTX255	DGS0201-02	Email from Fee Chang to Natalie Gonzales with cc: Andrew Sturmfels re Urgent – request call from CEO/President of Chain Bridge Bank	403; 801/802
DTX256	CBB00000779-81	Email from John Brough to David Evinger re Blue Flame Medical incoming wire 450 million	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX257	CBB00004453-62	Notes of David Evinger	403; 801/802
DTX258	CBB00000807	Email from David Evinger to Jennifer Lincoln, John Brough, Joanna Williamson, Farrukh Memon with cc Wires re Incoming Large Wire	801/802
DTX259	N/A	Plaintiff's Notice of Rule 30(b)(6) Videotaped Deposition of JPMorgan Chase Bank, N.A. (Rakesh Korpai)	
DTX260	JPMC-00000013	Email from Ana Prieto to Mackson Pereira re Conversation initiated by ana.c.prieto@jpmorgan.com	801/802
DTX261	JPMC-00000027-30	Email from Ana Prieto to Natalie Gonzales with cc: Cash Desk, Art Neville, Tamara Brown, Angelique Uribe re 03/26/20 Large Outgoing Wire [202003260005534] with attachments	403; 801/802; 901/902
DTX262	JPMC-00000036-40	Email from Brian Page to Art Neville, Alexander Leonard with cc: June Cantrell, Ana Prieto re 03/26/20 STO Large Outgoing Wire with attachments	403; 801/802; 901/902
DTX263	JPMC-00000046	Email from June Cantrell to Rakesh Korpai re Conversation initiated by June.m.cantrell@chase.com	801/802
DTX264	JPMC-00000049-53	Email from June Cantrell to Rakesh Korpai re FW 03/26/20 Large Outgoing Wire with attachments	403; 801/802; 901/902
DTX265	JPMC-00000068	Email from Timothy Coffey to Rakesh Korpai re Conversation initiated by timothy.p.coffey@jpmchase.com	403; 801/802; 901/902
DTX266	JPMC-00000069	Skype conversation between June Cantrell and Rakesh Korpai	403; 801/802
DTX267	JPMC-00000119	Email from Rakesh Korpai to Shinu Varghese re Conversation initiated by rakesh.korpai@jpmchase.com	401/402; 801/802
DTX268	JPMC-00000121	Email from Rakesh Korpai to Michael Smith re Conversation initiated by rakesh.korpai@jpmchase.com	403; 801/802; 901/902
DTX269	JPMC-00000247	Email from Timothy Coffey to Brian Stephenson re \$456MM/Chain Bridge Bank/JPM200326-004818/ Funds recovered on 3/26	801/802; 901/902
DTX270	JPMC-00000270	Email from Rakesh Korpai to Brian Stephenson re Conversation initiated by rakesh.korpai@jpmchase.com	403; 801/802; 901/902

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX271	JPMC-00000465	Handwritten notes	801/802; 901/902
DTX272	JPMC-00000469-70	JPMC Transaction Reference Number: 2693100086JO/Client Name: California State Treasurer Alert Summary	106; 801/802; 901/902
DTX273	DGS0960	Email from Lilian Lee to Fee Chang [no re line]	801/802
DTX274	DGS4006-30	Email from Natalie Gonzales to Fee Chang with cc: Andrew Sturmfels, Lilian Lee re Urgent – request call from CEO/President of Chain Bridge Bank	403; 801/802
DTX275	DGS0209-10	Email from Andrew Sturmfels to Andre Rivera re email chain restored w/all who need to know....	801/802
DTX276	BFM000009562-565	Email from Ethan Bearman to Mike Gula re: Fwd: New voicemail	401/402; 403; 801/802
DTX277	JPMC-00000394-395	Email from Art Neville to Rakesh Korpall and Rosalyn Nguyen re: Confidential: State of California	403; 801/802
DTX278	JPMC-00000070	Messages from June Cantrell to Rakesh Korpall re: Conversation initiated by rakesh.korpall@jpmchase.com	403; 801/802
DTX279	BFM000117809-835	Email from Ethan Bearman to Marc Serrio re: FW: Wire info	401/402; 801/802
DTX280	BFM000077716-17	Ltr. from Danny Mays (Maryland) to Mike Gula re: Purchase Order #H00P0601445	401/402; 403; 801/802
DTX281	BFM000111223-227	Email from John Thomas to Abby Browning re: Facemask sample?	401/402; 801/802
DTX282	BFM000074866	Text messages between Betty Yee and John Thomas	801/802
DTX283	BFM000065351-53	Email from Marc Serrio to John Thomas and Mike Gula re: Cash Position Snapshot	401/402; 403; 801/802
DTX284	BFM000048393-396	Email from Marc Serrio to Henry Huang, Mike Gula, Ethan Bearman, and Joy Xu re: Updated PO 1006 (Chicago) and Funds Sent to Wingar	401/402; 801/802
DTX285	BFM000046589-593	Email from Ethan Bearman to Mike Gula re: Fwd: URGENT PO 1-4	401/402; 801/802
DTX286	BFM000018938-940	Email from Ethan Bearman to Mike Gula re: Wiring Instructions	401/402; 801/802
DTX287	CBB00004294-301	Chain Bridge Bank, N.A. Wire Transfer Policy	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
DTX288	N/A	Sophia Bollag et al., 'Urgency and panic': Inside Gov. Gavin Newsom's rush to buy coronavirus gear, The Sacramento Bee	401/402; 403; 801/802
DTX289	BFM000001582	Great Health Companion Order Confirmation	401/402; 801/802
Objections to JPMC's Proposed Exhibits			
TPDX001	CBB00002792	Chain Bridge audio recording from 9:24 a.m. on March 25, 2020	801/802
TPDX002	CBB00002782	Chain Bridge audio recording from 9:56 a.m. on March 25, 2020	801/802
TPDX003	CBB00002783	Chain Bridge audio recording from 10:17 a.m. on March 25, 2020	801/802
TPDX004	CBB00002793	Chain Bridge audio recording from 2:36 p.m. on March 25, 2020	801/802
TPDX005	CBB00002785	Chain Bridge audio recording from 2:48 p.m. on March 25, 2020	801/802
TPDX006	CBB00002794	Chain Bridge audio recording from 3:48 p.m. on March 25, 2020	801/802
TPDX007	CBB00002795	Chain Bridge audio recording from 4:17 p.m. on March 25, 2020	801/802
TPDX008	CBB00002796	Chain Bridge audio recording from 4:24 p.m. on March 25, 2020	801/802
TPDX009	CBB00002797	Chain Bridge audio recording from 4:30 p.m. on March 25, 2020	801/802
TPDX010	CBB00002798	Chain Bridge audio recording from 4:46 p.m. on March 25, 2020	801/802
TPDX011	CBB00002786	Chain Bridge audio recording from 11:08 a.m. on March 26, 2020	801/802
TPDX012	CBB00002787	Chain Bridge audio recording from 11:52 a.m. on March 26, 2020	801/802
TPDX013	CBB00002788	Chain Bridge audio recording from 12:00 p.m. on March 26, 2020	801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
TPDX014	CBB00002784	Chain Bridge audio recording from 12:33 p.m. on March 26, 2020	801/802
TPDX015	CBB00002541	Chain Bridge audio recording from 12:44 p.m. on March 26, 2020	801/802
TPDX016	CBB00000707	Chain Bridge audio recording from 12:52 p.m. on March 26, 2020	801/802
TPDX017	CBB00002543	Chain Bridge audio recording from 12:55 p.m. on March 26, 2020	801/802
TPDX018	CBB00002544	Chain Bridge audio recording from 1:34 p.m. on March 26, 2020	801/802
TPDX019	CBB00002545	Chain Bridge audio recording from 1:37 p.m. on March 26, 2020	801/802
TPDX020	CBB00002789	Chain Bridge audio recording from 1:43 p.m. on March 26, 2020	801/802
TPDX021	CBB00002799	Chain Bridge audio recording from 2:16 p.m. on March 26, 2020	801/802
TPDX022	CBB00002790	Chain Bridge audio recording from 3:10 p.m. on March 26, 2020	801/802
TPDX023	CBB00002791	Chain Bridge audio recording from 3:26 p.m. on March 26, 2020	801/802
TPDX024	CBB00002800	Chain Bridge audio recording from 3:57 p.m. on March 26, 2020	801/802
TPDX025	CBB00000527	Email RE: No new accounts for these clients (beginning March 27, 2020 at 3:23:23 p.m.)	403; 801/802
TPDX026	CBB00000579- CBB00000582	Email RE: Message from JPMorgan Chase - Large Incoming Wire (beginning March 26, 2020 at 5:13:42 p.m.)	801/802
TPDX027	CBB00000643- CBB00000644	Email RE: Wire is being returned (beginning March 26, 2020 at 1:57:20 p.m.)	403; 801/802
TPDX028	CBB00000661- CBB00000671	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 1:34:41 p.m.)	403; 801/802

Exhibit Number¹	Bates Number	Description	Objection(s)
TPDX029	CBB00000728-CBB00000729	Email RE: Incoming Large Wire (beginning March 26, 2020 at 12:30:58 p.m.)	403; 801/802
TPDX030	CBB00000748	Email RE: Incoming Large Wire (beginning March 26, 2020 at 12:11:53 p.m.)	403; 801/802
TPDX031	CBB00000761-CBB00000763	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 25, 2020 at 9:03:13 p.m.)	403; 801/802
TPDX032	CBB00001294-CBB00001307	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 30, 2020 at 12:55:07 p.m.)	403; 801/802
TPDX033	CBB00001386-CBB00001389	Email RE: Completed: Blue Flame Strategies LLC - Wire Transfer Agreement and Wire Authorz (beginning March 26, 2020 at 12:13:31 p.m.)	403; 801/802
TPDX034	CBB00002731-CBB00002734	Email RE: \$450 Million wire came in (beginning March 26, 2020 at 12:13:51 p.m.)	403; 801/802
TPDX035	CBB00002779	2020-03-36_11:15 Incoming Wire	801/802; 901/902
TPDX036	CBB00002780	2020-03-25_14:06 Service Message Wire	801/802; 901/902
TPDX037	CBB00002781	2020-03-26_15:21 Return Wire	801/802; 901/902
TPDX038	CBB00004294-CBB00004301	Chain Bridge Bank Wire Transfer Policy	801/802
TPDX039	CBB00004312	Chain Bridge Daily Bank Balance Sheet (3/25/20, 10:11 p.m.)	106; 801/802; 901/902
TPDX040	CBB00004436	Bank Call Log 3.25-3.26	106; 801/802; 901/902
TPDX041	CBB00004452	Email RE: Call from John Thomas (beginning March 27, 2020 at 3:18:35 p.m.)	403; 801/802
TPDX042	CBB00004453-CBB00004467	Notes of David Evinger and John Brough	403; 801/802
TPDX043	CBB00004468	SilverLake Blue Flame Medical LLC - Easy Business Ck	801/802; 901/902
TPDX044	DGS0085-DGS0113	Email RE: email chain restored w/all who need to know..... (beginning March 26, 2020 at 2:54:30 p.m.)	801/802; 901/902

Exhibit Number¹	Bates Number	Description	Objection(s)
TPDX045	DGS0293	Email RE: Purchase Order No. M12948-T6619 (beginning July 29, 2020 at 4:17:11 p.m.)	801/802; 901/902
TPDX046	DGS0294-DGS0322	Correspondence to Angela Shell RE: Purchase Order M12948-T6619 to Blue Flame Medical LLC	801/802; 901/902
TPDX047	DGS2001	Email RE: Fwd: Blue Flame (beginning April 2, 2020 at 2:49:00 p.m.)	801/802; 901/902
TPDX048	DGS4006-DGS4030	Email RE: Urgent - request call from CEO/President of Chain Bridge Bank (beginning March 26, 2020 at 10:15:58 a.m.)	801/802; 901/902
TPDX049	DGS4998	Email RE: Chain Bridge Bank Information (beginning March 26, 2020 at 9:46:12 a.m.)	401/402; 801/802
TPDX050	DGS6548-DGS6549	Email RE: *Urgent* Call from Chain Bridge Bank RE: Large Sum Wire Transfer (beginning March 26, 2020 26 at 9:54:40 a.m.)	801/802; 901/902
TPDX051	DGS8016-DGS8021	Chronology and Note to file: March 26, 2020	801/802; 901/902
TPDX052	JPMC-00000069	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 16:38:50)	403; 801/802
TPDX053	JPMC-00000071	Conversation initiated by brian.stephenson@jpmchase.com (beginning March 26, 2020 at 4:49:37 p.m.)	403; 801/802
TPDX054	JPMC-00000089-JPMC-00000094	Email RE: FW: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 5:59:05 p.m.)	403; 801/802; 901/902
TPDX055	JPMC-00000124	Conversation with Korpall, Rakesh (CIB OPS, USA) (beginning March 26 at 12:12 p.m.)	403; 801/802
TPDX056	JPMC-00000136	Email RE: California State Treasurer's Office (STO) - Wire (beginning March 26, 2020 at 7:20:16 p.m.)	403; 801/802
TPDX057	JPMC-00000147-JPMC-00000151	Email RE: PRPC case (beginning March 26, 2020 at 7:35:13 p.m.)	106; 403; 801/802; 901/902
TPDX058	JPMC-00000152-JPMC-00000156	Email RE: PRPC case (beginning March 26, 2020 at 7:36:56 p.m.)	106; 403; 801/802; 901/902
TPDX059	JPMC-00000170-JPMC-00000176	Email RE: PRPC case (beginning March 26, 2020 at 8:03:42 p.m.)	106; 403; 801/802; 901/902

Exhibit Number ¹	Bates Number	Description	Objection(s)
TPDX060	JPMC-00000177-JPMC-00000178	Email RE: State of California \$456MM Returned (beginning March 26, 2020 at 8:04:04 p.m.)	106; 403; 801/802; 901/902
TPDX061	JPMC-00000179-JPMC-00000185	Email RE: PRPC case (beginning March 26, 2020 at 8:04:39 p.m.)	106; 403; 801/802; 901/902
TPDX062	JPMC-00000198-JPMC-00000199	Email RE: Recalled Wire (beginning March 26 at 8:10:54 p.m.)	403; 801/802
TPDX063	JPMC-00000469-JPMC-00000470	State of California_TRN	106; 801/802; 901/902
TPDX064	BFM000074101-BFM000074106	Email RE: FW: Contact Info (beginning March 26, 2020 at 10:56 a.m.)	801/802
TPDX065		Fedwire® Funds Service - Annual Statistics, The Federal Reserve, available at https://www.frb services.org/resources/financial-services/wires/volume-value-stats/annual-stats.html	401/402; 801/802; 901/902
TPDX066		Fedwire® Funds Service - Monthly Statistics, The Federal Reserve, available at https://www.frb services.org/resources/financial-services/wires/volume-value-stats/monthly-stats.html	401/402; 801/802; 901/902
TPDX067		Payments Market Practice Group, Market Practice Guidelines for the Cancellation of Suspected Fraudulent Transactions and Handling of Compliance/Regulatory Inquiries 3 (SWIFT 2d ed., 2018)	401/402; 702/703; 801/802; 901/902
TPDX068		Payments Market Practice Group, Recovery of Suspected Fraudulent Transactions (SWIFT, 2019), available at https://www.swift.com/swift-resource/229376/download	401/402; 702/703; 801/802; 901/902
TPDX069		10/13/20 Plaintiff's Responses to Defendants' First Set of Interrogatories to Blue Flame Medical LLC (Nos. 1-6), including Schedule A Plaintiff's Responses to Defendants' First Set of Interrogatories to Blue Flame Medical LLC (No. 4)	
TPDX070		10/28/20 Defendants' Responses to Plaintiff's First Set of Interrogatories (Nos. 1-9)	

Exhibit Number ¹	Bates Number	Description	Objection(s)
TPDX071		3/31/2021 JPMorgan Chase Bank, N.A.'s Responses to Chain Bridge's First Set of Interrogatories (Nos. 1-7)	
TPDX072		2/12/21 Expert Report and Appendices of Teresa A. Pesce on Behalf of Third-Party Defendant JPMorgan Chase Bank, N.A.	702/703
TPDX073		2/12/21 Expert Report, Exhibits, and Appendices of Mark Faulkner	702/703
TPDX074		3/12/21 Expert Report and Appendices of Thomas C. Baxter, Jr. on Behalf of Third-Party Defendant JPMorgan Chase Bank, N.A.	702/703
TPDX075		3/19/21 Expert Report, Exhibits, and Appendices of Laura B. Stamm	702/703
TPDX076	CBB00000594-CBB00000599	Email RE: Please close BlueFlame Accounts (beginning March 26, 2020 at 3:22:44 p.m.)	106; 403; 801/802; 901/902
TPDX077	CBB00000655-CBB00000657	Email RE: Blue Flame Medical LLC – Wire Transfer (beginning March 26, 2020 at 1:50:30 p.m.)	403; 801/802
TPDX078	CBB00000815-CBB00000817	Email RE: Please close BlueFlame Accounts (beginning March 26, 2020 at 2:43:14 p.m.)	403; 801/802
TPDX079	CBB00000919-CBB00000929	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 12:17:42 p.m.)	106; 403; 801/802; 901/902
TPDX080	CBB00001008-CBB00001029	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 12:05:43 p.m.)	403; 801/802
TPDX081	CBB00001738-CBB00001739	Blue Flame Medical LLC ICS Shadow Account Agreement (unsigned)	801/802
TPDX082	CBB00002507	Email RE: Governor Newsom Takes Action to Strengthen California's Health Care Delivery System to Respond to COVID-19 (beginning March 26, 2020 at 7:36 p.m.)	401/402; 403; 801/802
TPDX083	CBB00002673-CBB00002677	Email RE: Contact Info (beginning March 26, 2020 at 12:02:38 p.m.)	106; 403; 801/802; 901/902
TPDX084	CBB00002699	Email RE: Screenshot 2020-03-25 at 6.26.08 PM (beginning March 25, 2020 at 6:26:47 p.m.)	801/802

Exhibit Number ¹	Bates Number	Description	Objection(s)
TPDX085	CBB00002700	Screenshot by John Thomas (at 6:25 p.m. on March 25) of 3:13 p.m. email from Michael Wong	106; 801/802; 901/902
TPDX086	CBB00003573-CBB00003474 00003	Email RE: Wire (beginning March 25, 2020 at 4:20:47 p.m.)	801/802
TPDX087	CBB00004323-CBB00004362	Chain Bridge Call Log March 26, 2020	106; 403; 801/802; 901/902
TPDX088	CBB00004438	Evinger Cell Log March 25 – March 26, 2020	106; 801/802; 901/902
TPDX089	CBB00004445	Handwritten notes dated March 25, 2020	106; 801/802; 901/902
TPDX090	CBB00004469-CBB00004528	Chain Bridge Spark chat messages	106; 403; 801/802; 901/902
TPDX091	DGS0215	Blue Flame Medical LLC Invoice to Michael Wong (annotated)	801/802; 901/902
TPDX092	DGS0329	Email RE: Canceled/Terminated POs N95 (beginning July 14, 2020 at 10:08:45 p.m.)	401/402; 403; 801/802; 901/902
TPDX093	STO0001	Book Transfer Credit (dated March 26, 2020)	403; 801/802; 901/902
TPDX094	JPMC-000000003-JPMC-00000005	Email RE: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 3:32:23 p.m.)	403; 801/802; 901/902
TPDX095	JPMC-000000009	Email RE: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 3:33:21 p.m.)	403; 801/802; 901/902
TPDX096	JPMC-000000027-JPMC-00000030	Email RE: 03/26/20 Large Outgoing Wire (beginning March 26, 2020 at 4:04:06 p.m.)	403; 801/802; 901/902
TPDX097	JPMC-000000047	Conversation initiated by june.cantrell@chase.com (beginning March 26, 2020 at 16:08:15)	801/802; 901/902
TPDX098	JPMC-000000063-JPMC-00000066	Email RE: (beginning March 26, 2020 at 4:28:09 p.m.)	403; 801/802; 901/902
TPDX099	JPMC-000000068	Conversation initiated by timothy.p.coffey@jpmchase.com (beginning March 26, 2020 at 16:36:40)	403; 801/802; 901/902
TPDX100	JPMC-000000120	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:17:47 p.m.)	403; 801/802; 901/902

Exhibit Number¹	Bates Number	Description	Objection(s)
TPDX101	JPMC-00000121	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:24:51 p.m.)	403; 801/802; 901/902
TPDX102	JPMC-00000123	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:29:39 p.m.)	403; 801/802; 901/902
TPDX103	JPMC-00000231-JPMC-00000232	Email RE: California State Treasurer's Office (STO) - Wire (beginning March 26, 2020 at 10:46:34 p.m.)	403; 801/802
TPDX104	JPMC-00000243	Conversation with Korpall, Rakesh (CIB OPS, USA) (beginning March 27, 2020 at 1:48:24 p.m.)	403; 801/802; 901/902
TPDX105	JPMC-00000429-JPMC-00000448	Account Review	403; 801/802; 901/902
TPDX106	JPMC-00000467-JPMC-00000468	Calif. Report	403; 801/802

Dated : April 26, 2021

Respectfully submitted,

/s/ Peter H. White

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th 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 26, 2021

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