

**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.

**JPMORGAN CHASE BANK, N.A.’S PRETRIAL DISCLOSURES  
CONCERNING WITNESSES**

Under Federal Rule of Civil Procedure 26(a)(3)(A)(i)-(ii), and this Court’s November 9, 2020 Order (Dkt. 33), Third-Party Defendant JPMorgan Chase Bank, N.A. (“JPMC”) provides the following pretrial disclosures concerning trial witnesses. JPMC reserves the right to supplement and/or revise these disclosures before trial. JPMC reserves the right to call additional witnesses to impeach testimony by other witnesses. JPMC reserves the right to call additional witnesses regarding the authenticity or admissibility of any material proffered at trial. To the extent a witness’s circumstances change, or a witness becomes unavailable for trial, JPMC reserves the right to call that witness by deposition or to call a substitute witness.

**I. Disclosures Under Federal Rule of Civil Procedure 26(a)(3)(A)(i)**

A. JPMC expects to present the following witnesses at trial:

| <b>Name</b>                                 | <b>Address and Telephone Number</b>                                                                                                           |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>JPMC</b>                                 |                                                                                                                                               |
| Rakesh Korpai                               | c/o WilmerHale<br>7 World Trade Center<br>250 Greenwich Street<br>New York, NY 10007<br>(202) 230-8800                                        |
| Tim Coffey                                  | Same as above.                                                                                                                                |
| <b>Chain Bridge Bank, N.A.</b>              |                                                                                                                                               |
| David Evinger                               | c/o Robbins, Russel, Englert, Orseck, Untereiner<br>& Sauber LLP<br>2000 K Street, N.W. 4th Floor<br>Washington, D.C. 20006<br>(202) 775-4500 |
| John Brough                                 | Same as above.                                                                                                                                |
| Heather Schoeppe                            | Same as above.                                                                                                                                |
| Claudia Mojica-Gaudron                      | Same as above.                                                                                                                                |
| <b>State of California</b>                  |                                                                                                                                               |
| Natalie Gonzales                            | California State Treasurer's Office<br>915 Capitol Mall C-15, Room 110<br>Sacramento, CA 95814<br>(916) 653-2995                              |
| <b>Experts</b>                              |                                                                                                                                               |
| Teresa Pesce<br><i>JPMC Expert Witness</i>  | c/o WilmerHale<br>7 World Trade Center<br>250 Greenwich Street<br>New York, NY 10007<br>(202) 230-8800                                        |
| Thomas Baxter<br><i>JPMC Expert Witness</i> | Same as above.                                                                                                                                |

|                                                             |                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mark Faulkner<br><i>JPMC/Chain Bridge Expert Witness</i>    | c/o WilmerHale<br>7 World Trade Center<br>250 Greenwich Street<br>New York, NY 10007<br>(202) 230-8800<br><br>Robbins, Russel, Englert, Orseck, Untereiner & Sauber LLP<br>2000 K Street, N.W. 4th Floor<br>Washington, D.C. 20006<br>(202) 775-4500 |
| Laura Stamm<br><i>JPMC/Chain Bridge Expert Witness</i>      | Same as above.                                                                                                                                                                                                                                       |
| <b>Any Witness Identified by Chain Bridge or Blue Flame</b> |                                                                                                                                                                                                                                                      |

B. If the need arises, JPMC may present the following witnesses at trial:

| <b>Name</b>                                                 | <b>Address and Telephone Number</b>                                                                                                        |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Chain Bridge Bank, N.A.</b>                              |                                                                                                                                            |
| Thais Ribeiro                                               | c/o Robbins, Russel, Englert, Orseck, Untereiner & Sauber LLP<br>2000 K Street, N.W. 4th Floor<br>Washington, D.C. 20006<br>(202) 775-4500 |
| Mariano Castagnello                                         | Same as above.                                                                                                                             |
| <b>Any Witness Identified by Chain Bridge or Blue Flame</b> |                                                                                                                                            |

## II. Disclosures Under Federal Rule of Civil Procedure 26(a)(3)(A)(ii)

Except for any witness identified by Chain Bridge or Blue Flame, JPMC does not currently expect to present any witness by deposition.

Dated: April 15, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE  
AND DORR LLP**

/s/ Meredith K. Loretta

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*Attorneys for Third-Party Defendant  
JPMorgan Chase Bank, N.A.*

**CERTIFICATE OF SERVICE**

I certify that on this 15th day of April, 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

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