

**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 (LMB/IDD)

CHAIN BRIDGE BANK, N.A.,

Third-Party Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Third-Party Defendant.

**DECLARATION OF MEREDITH K. LORETTA IN SUPPORT OF
JPMORGAN CHASE BANK, N.A.'S REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

Meredith K. Loretta, an attorney duly admitted to practice law in the Commonwealth of Virginia, declares as follows:

1. I am an attorney at Wilmer Cutler Pickering Hale and Dorr LLP, and counsel for Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC") in the above-captioned case. I make this declaration based upon my personal knowledge and documents provided to me, in support of JPMC's Reply in Support of Motion for Summary Judgment.
2. Attached hereto as Exhibit 1 is a true and accurate copy of excerpts from the Expert Report of Thomas C. Baxter, Jr. dated March 12, 2021.

3. Attached hereto as Exhibit 2 is a true and accurate copy of excerpts from the Expert Report of Charles H. Grice, dated February 12, 2021.

4. Attached hereto as Exhibit 3 is a true and accurate copy of excerpts from the transcript of the deposition of John J. Brough, taken on February 2, 2021.

5. Attached hereto as Exhibit 4 is a true and accurate copy of excerpts from the transcript of the deposition of Charles H. Grice, taken on April 9-10, 2021.

6. Attached hereto as Exhibit 5 is a true and accurate copy of an email titled “RE: NEW business account needed” from Mike Gula to Maria Cole dated March 25, 2020 at 12:25:54 p.m., produced by Chain Bridge, bearing Bates numbers CBB00001514-CBB00001517.

7. Attached hereto as Exhibit 6 is a true and accurate copy of excerpts from a publication titled “FedLine Training for Account Holders” dated January 2002 and previously archived on the Federal Reserve Bank of Minneapolis’s website, available at <https://tinyurl.com/2ehk6kpr>.

Executed on: May 27, 2021
Washington, DC

/s/ Meredith K. Loretta
Meredith K. Loretta