

**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 TRIAL EXHIBIT LIST

Third-Party Defendant JPMorgan Chase Bank, N.A. ("JPMC") respectfully submits its trial exhibit list. JPMC reserves the right to amend this disclosure prior to trial. JPMC further reserves the right to use exhibits listed on Plaintiff's, Defendants', and Third-Party Plaintiff's exhibits lists. JPMC also reserves the right to use or mark for identification discovery responses, disclosures, contentions, expert reports, and declarations. JPMC further reserves the right to mark for identification additional documents as necessitated by any witness's testimony at trial. By listing documents as exhibits on this list, JPMC is not waiving objections to the use of such documents for any and all purposes. JPMC reserves the right to withdraw any exhibit based on rulings on trial motions and/or summary judgment motions not yet filed, or for any other reason.

Dated: April 15, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

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JPMorgan Chase Bank, N.A.*

Blue Flame Medical LLC v. Chain Bridge Bank, N.A., et al.
Third-Party Defendant JPMorgan Chase Bank, N.A.'s Trial Exhibit List—April 15, 2021

Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
1	Chain Bridge audio recording from 9:24 a.m. on March 25, 2020	CBB00002792
2	Chain Bridge audio recording from 9:56 a.m. on March 25, 2020	CBB00002782
3	Chain Bridge audio recording from 10:17 a.m. on March 25, 2020	CBB00002783
4	Chain Bridge audio recording from 2:36 p.m. on March 25, 2020	CBB00002793
5	Chain Bridge audio recording from 2:48 p.m. on March 25, 2020	CBB00002785
6	Chain Bridge audio recording from 3:48 p.m. on March 25, 2020	CBB00002794
7	Chain Bridge audio recording from 4:17 p.m. on March 25, 2020	CBB00002795
8	Chain Bridge audio recording from 4:24 p.m. on March 25, 2020	CBB00002796
9	Chain Bridge audio recording from 4:30 p.m. on March 25, 2020	CBB00002797
10	Chain Bridge audio recording from 4:46 p.m. on March 25, 2020	CBB00002798
11	Chain Bridge audio recording from 11:08 a.m. on March 26, 2020	CBB00002786
12	Chain Bridge audio recording from 11:52 a.m. on March 26, 2020	CBB00002787
13	Chain Bridge audio recording from 12:00 p.m. on March 26, 2020	CBB00002788

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
14	Chain Bridge audio recording from 12:33 p.m. on March 26, 2020	CBB00002784
15	Chain Bridge audio recording from 12:44 p.m. on March 26, 2020	CBB00002541
16	Chain Bridge audio recording from 12:52 p.m. on March 26, 2020	CBB00000707
17	Chain Bridge audio recording from 12:55 p.m. on March 26, 2020	CBB00002543
18	Chain Bridge audio recording from 1:34 p.m. on March 26, 2020	CBB00002544
19	Chain Bridge audio recording from 1:37 p.m. on March 26, 2020	CBB00002545
20	Chain Bridge audio recording from 1:43 p.m. on March 26, 2020	CBB00002789
21	Chain Bridge audio recording from 2:16 p.m. on March 26, 2020	CBB00002799
22	Chain Bridge audio recording from 3:10 p.m. on March 26, 2020	CBB00002790
23	Chain Bridge audio recording from 3:26 p.m. on March 26, 2020	CBB00002791
24	Chain Bridge audio recording from 3:57 p.m. on March 26, 2020	CBB00002800
25	Email RE: No new accounts for these clients (beginning March 27, 2020 at 3:23:23 p.m.)	CBB00000527
26	Email RE: Message from JPMorgan Chase - Large Incoming Wire (beginning March 26, 2020 at 5:13:42 p.m.)	CBB00000579-CBB00000582

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
27	Email RE: Wire is being returned (beginning March 26, 2020 at 1:57:20 p.m.)	CBB00000643-CBB00000644
28	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 1:34:41 p.m.)	CBB00000661-CBB00000671
29	Email RE: Incoming Large Wire (beginning March 26, 2020 at 12:30:58 p.m.)	CBB00000728-CBB00000729
30	Email RE: Incoming Large Wire (beginning March 26, 2020 at 12:11:53 p.m.)	CBB00000748
31	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 25, 2020 at 9:03:13 p.m.)	CBB00000761-CBB00000763
32	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 30, 2020 at 12:55:07 p.m.)	CBB00001294-CBB00001307
33	Email RE: Completed: Blue Flame Strategies LLC - Wire Transfer Agreement and Wire Authorz (beginning March 26, 2020 at 12:13:31 p.m.)	CBB00001386-CBB00001389
34	Email RE: \$450 Million wire came in (beginning March 26, 2020 at 12:13:51 p.m.)	CBB00002731-CBB00002734
35	2020-03-36_11:15 Incoming Wire	CBB00002779

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
36	2020-03-25_14:06 Service Message Wire	CBB00002780
37	2020-03-26_15:21 Return Wire	CBB00002781
38	Chain Bridge Bank Wire Transfer Policy	CBB00004294-CBB00004301
39	Chain Bridge Daily Bank Balance Sheet (3/25/20, 10:11 p.m.)	CBB00004312
40	Bank Call Log 3.25-3.26	CBB00004436
41	Email RE: Call from John Thomas (beginning March 27, 2020 at 3:18:35 p.m.)	CBB00004452
42	Notes of David Evinger and John Brough	CBB00004453-CBB00004467
43	SilverLake Blue Flame Medical LLC - Easy Business Ck	CBB00004468
44	Email RE: email chain restored w/all who need to know..... (beginning March 26, 2020 at 2:54:30 p.m.)	DGS0085-DGS0113
45	Email RE: Purchase Order No. M12948-T6619 (beginning July 29, 2020 at 4:17:11 p.m.)	DGS0293
46	Correspondence to Angela Shell RE: Purchase Order M12948-T6619 to Blue Flame Medical LLC	DGS0294-DGS0322

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
47	Email RE: Fwd: Blue Flame (beginning April 2, 2020 at 2:49:00 p.m.)	DGS2001
48	Email RE: Urgent - request call from CEO/President of Chain Bridge Bank (beginning March 26, 2020 at 10:15:58 a.m.)	DGS4006-DGS4030
49	Email RE: Chain Bridge Bank Information (beginning March 26, 2020 at 9:46:12 a.m.)	DGS4998
50	Email RE: *Urgent* Call from Chain Bridge Bank RE: Large Sum Wire Transfer (beginning March 26, 2020 26 at 9:54:40 a.m.)	DGS6548-DGS6549
51	Chronology and Note to file: March 26, 2020	DGS8016-DGS8021
52	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 16:38:50)	JPMC-00000069
53	Conversation initiated by brian.stephenson@jpmchase.com (beginning March 26, 2020 at 4:49:37 p.m.)	JPMC-00000071
54	Email RE: FW: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 5:59:05 p.m.)	JPMC-00000089-JPMC-00000094
55	Conversation with Korpall, Rakesh (CIB OPS, USA) (beginning March 26 at 12:12 p.m.)	JPMC-00000124
56	Email RE: California State Treasurer's Office (STO) - Wire (beginning March 26, 2020 at 7:20:16 p.m.)	JPMC-00000136

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
57	Email RE: PRPC case (beginning March 26, 2020 at 7:35:13 p.m.)	JPMC-00000147-JPMC-00000151
58	Email RE: PRPC case (beginning March 26, 2020 at 7:36:56 p.m.)	JPMC-00000152-JPMC-00000156
59	Email RE: PRPC case (beginning March 26, 2020 at 8:03:42 p.m.)	JPMC-00000170-JPMC-00000176
60	Email RE: State of California \$456MM Returned (beginning March 26, 2020 at 8:04:04 p.m.)	JPMC-00000177-JPMC-00000178
61	Email RE: PRPC case (beginning March 26, 2020 at 8:04:39 p.m.)	JPMC-00000179-JPMC-00000185
62	Email RE: Recalled Wire (beginning March 26 at 8:10:54 p.m.)	JPMC-00000198-JPMC-00000199
63	State of California_TRN	JPMC-00000469-JPMC-00000470
64	Email RE: FW: Contact Info (beginning March 26, 2020 at 10:56 a.m.)	BFM000074101-BFM 000074106
65	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	
66	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	

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
TPDX #	Description	Bates #
67	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)	
68	Payments Market Practice Group, Recovery of Suspected Fraudulent Transactions (SWIFT, 2019), available at https://www.swift.com/swift-resource/229376/download	
69	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)	
70	10/28/20 Defendants' Responses to Plaintiff's First Set of Interrogatories (Nos. 1-9)	
71	3/31/2021 JPMorgan Chase Bank, N.A.'s Responses to Chain Bridge's First Set of Interrogatories (Nos. 1-7)	
72	2/12/21 Expert Report and Appendices of Teresa A. Pesce on Behalf of Third-Party Defendant JPMorgan Chase Bank, N.A.	
73	2/12/21 Expert Report, Exhibits, and Appendices of Mark Faulkner	
74	3/12/21 Expert Report and Appendices of Thomas C. Baxter, Jr. on Behalf of Third-Party Defendant JPMorgan Chase Bank, N.A.	

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Exhibits That Third-Party Defendant Expects to Offer at Trial		
75	3/19/21 Expert Report, Exhibits, and Appendices of Laura B. Stamm	

**Blue Flame Medical LLC v. Chain Bridge Bank, N.A., et al.
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Exhibits That Third-Party Defendant May Present at Trial If the Need Arises		
TPDX #	Description	Bates #
76	Email RE: Please close BlueFlame Accounts (beginning March 26, 2020 at 3:22:44 p.m.)	CBB00000594-CBB00000599
77	Email RE: Blue Flame Medical LLC – Wire Transfer (beginning March 26, 2020 at 1:50:30 p.m.)	CBB00000655-CBB00000657
78	Email RE: Please close BlueFlame Accounts (beginning March 26, 2020 at 2:43:14 p.m.)	CBB00000815-CBB00000817
79	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 12:17:42 p.m.)	CBB00000919-CBB00000929
80	Email RE: Blue Flame Medical incoming wire 450 million (beginning March 26, 2020 at 12:05:43 p.m.)	CBB00001008-CBB00001029
81	Blue Flame Medical LLC ICS Shadow Account Agreement (unsigned)	CBB00001738-CBB00001739
82	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.)	CBB00002507
83	Email RE: Contact Info (beginning March 26, 2020 at 12:02:38 p.m.)	CBB00002673-CBB00002677
84	Email RE: Screenshot 2020-03-25 at 6.26.08 PM (beginning March 25, 2020 at 6:26:47 p.m.)	CBB00002699

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Exhibits That Third-Party Defendant May Present at Trial If the Need Arises		
TPDX #	Description	Bates #
85	Screenshot by John Thomas (at 6:25 p.m. on March 25) of 3:13 p.m. email from Michael Wong	CBB00002700
86	Email RE: Wire (beginning March 25, 2020 at 4:20:47 p.m.)	CBB00003573-CBB00003474_00003
87	Chain Bridge Call Log March 26, 2020	CBB00004323-CBB00004362
88	Evinger Cell Log March 25 – March 26, 2020	CBB00004438
89	Handwritten notes dated March 25, 2020	CBB00004445
90	Chain Bridge Spark chat messages	CBB00004469-CBB00004528
91	Blue Flame Medical LLC Invoice to Michael Wong (annotated)	DGS0215
92	Email RE: Canceled/Terminated POs N95 (beginning July 14, 2020 at 10:08:45 p.m.)	DGS0329
93	Book Transfer Credit (dated March 26, 2020)	STO0001
94	Email RE: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 3:32:23 p.m.)	JPMC-00000003-JPMC-00000005
95	Email RE: EXPEDITE REVIEW/APPROVAL Held Payment (beginning March 26, 2020 at 3:33:21 p.m.)	JPMC-00000009

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Exhibits That Third-Party Defendant May Present at Trial If the Need Arises		
TPDX #	Description	Bates #
96	Email RE: 03/26/20 Large Outgoing Wire (beginning March 26, 2020 at 4:04:06 p.m.)	JPMC-00000027-JPMC-00000030
97	Conversation initiated by june.cantrell@chase.com (beginning March 26, 2020 at 16:08:15)	JPMC-00000047
98	Email RE: (beginning March 26, 2020 at 4:28:09 p.m.)	JPMC-00000063-JPMC-00000066
99	Conversation initiated by timothy.p.coffey@jpmchase.com (beginning March 26, 2020 at 16:36:40)	JPMC-00000068
100	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:17:47 p.m.)	JPMC-00000120
101	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:24:51 p.m.)	JPMC-00000121
102	Conversation initiated by rakesh.korpall@jpmchase.com (beginning March 26, 2020 at 6:29:39 p.m.)	JPMC-00000123
103	Email RE: California State Treasurer's Office (STO) - Wire (beginning March 26, 2020 at 10:46:34 p.m.)	JPMC-00000231-JPMC-00000232
104	Conversation with Korpall, Rakesh (CIB OPS, USA) (beginning March 27, 2020 at 1:48:24 p.m.)	JPMC-00000243
105	Account Review	JPMC-00000429-JPMC-00000448

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Exhibits That Third-Party Defendant May Present at Trial If the Need Arises		
106	Calif. Report	JPMC-00000467-JPMC-00000468

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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