

**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.

**DEFENDANTS'/THIRD-PARTY PLAINTIFF'S OBJECTIONS TO PLAINTIFF BLUE
FLAME MEDICAL LLC AND THIRD-PARTY DEFENDANT JPMORGAN CHASE
BANK, N.A.'S RULE 26(a)(3)(A)(ii) DESIGNATIONS OF WITNESSES WHOSE
TESTIMONY IS TO BE PRESENTED BY DEPOSITION**

Pursuant to Federal Rules of Civil Procedure 26(a)(3)(B) and 32(a), Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A., and Defendants John J. Brough and David M. Evinger (collectively, "Defendants") submit the following objections to (1) Plaintiff Blue Flame Medical LLC's Witness List (ECF No. 92), which identifies certain witness testimony that Plaintiff may seek to present through designated depositions and reserves the right to introduce deposition testimony in place of live testimony, and (2) JPMorgan Chase Bank, N.A.'s Pretrial Disclosures

Concerning Witnesses (ECF No. 91), in which JPMorgan Chase Bank, N.A. reserves the right to call witnesses by deposition. Defendants reserve the right to supplement these objections, including through motions *in limine* and in light of any rulings thereon. As the parties have not yet designated specific portions of depositions to be presented at trial, Defendants further reserve the right to object to specific portions of depositions designated for presentation at trial on any grounds. Under Federal Rule of Civil Procedure 32(a), Defendants objects to Blue Flame Medical LLC and JPMorgan Chase Bank, N.A.'s designations to the extent that any designated witness is not unavailable.

Witness Whose Testimony May Be Presented by Deposition	Objection
Rakesh Korpall/JPMorgan Chase Bank, N.A. (February 9, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions of Mr. Korpall's individual and/or Rule 30(b)(6) deposition that may confuse the issues or mislead the jury as to his testimony. Defendants further object to testimony that exceeds the scope of the Rule 30(b)(6) topics designated for this deposition.
California State Controller's Office 30(b)(6) (Richard Chivaro) (March 4, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions of Mr. Chivaro's Rule 30(b)(6) deposition that may confuse the issues or mislead the jury as to his testimony. Defendants further object to testimony that exceeds the scope of the Rule 30(b)(6) topics designated for this deposition.
Natalie Gonzales (January 28, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions of Ms. Gonzales's deposition that may confuse the issues or mislead the jury as to her testimony.
Daniel Kim (March 29, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions to Mr. Kim's deposition that may confuse the issues or mislead the jury as to his testimony.
Andrew Sturmfels (February 10, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions to Mr. Sturmfels's deposition that may confuse the issues or mislead the jury as to his testimony.

Michael Wong (January 19, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions to Mr. Wong's deposition that may confuse the issues or mislead the jury as to his testimony.
Henry Huang	To the extent Mr. Huang is deposed at a later date, Defendants object under Fed. R. Evid. 106 to any incomplete portions to Mr. Huang's deposition that may confuse the issues or mislead the jury as to his testimony.
Timothy Coffey (February 11, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions to Mr. Coffey's deposition that may confuse the issues or mislead the jury as to his testimony.
Stephanie Daily Smith (April 12, 2021)	Defendants object under Fed. R. Evid. 106 to any incomplete portions to Ms. Smith's deposition that may confuse the issues or mislead the jury as to her testimony.

Dated: April 29, 2021

/s/ Donald Burke

Donald Burke (VA Bar No. 76550)
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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2021, I will cause the foregoing to be served via email
to the following:

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