

**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 OBJECTIONS TO
CHAIN BRIDGE BANK, N.A.’s RULE 26(a)(3)(A)(ii) DESIGNATION OF WITNESSES
WHOSE TESTIMONY IS TO BE PRESENTED BY DEPOSITION**

Under Federal Rule of Civil Procedure 26(a)(3)(B) and Federal Rule of Civil Procedure 32(a), Third-Party Defendant JPMorgan Chase Bank, N.A. (“JPMC”) submits the following objections to Defendant/Third-Party Plaintiff Chain Bridge Bank, N.A.’s Rule 26(a)(A)(ii) designation of witness testimony to be presented by deposition (Dkt. 94). JPMC reserves the right to supplement these objections, including through motions *in limine* and in light of any rulings thereupon. The parties have not yet designated the specific portions of depositions to be presented at trial; JPMC reserves the right to object on any grounds to any such portions

designated by Chain Bridge. Under Federal Rule of Civil Procedure 32(a), JPMC objects to Chain Bridge's designations to the extent that any designated witness is not unavailable.

Witness Whose Testimony Is to Be Presented by Deposition	Objection
Ethan Bearman (January 21, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Bearman's deposition that may confuse the issues or mislead the jury as to his testimony.
California State Controller's Office 30(b)(6) (Richard Chivaro) (March 4, 2021)	JPMC objects 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. JPMC further objects to testimony that exceeds the scope of the Rule 30(b)(6) topics designated for this deposition.
Timothy Coffey (February 11, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Coffey's deposition that may confuse the issues or mislead the jury as to his testimony.
Natalie Gonzales (January 28, 2021)	JPMC objects 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.
Michael Gula (January 12, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Gula's deposition that may confuse the issues or mislead the jury as to his testimony.
Daniel Kim (March 29, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Kim's deposition that may confuse the issues or mislead the jury as to his testimony.
Rakesh Korpai/JPMC 30(b)(6) (February 9, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Korpai's individual and/or Rule 30(b)(6) deposition that may confuse the issues or mislead the jury as to his testimony. JPMC further objects to testimony that exceeds the scope of the Rule 30(b)(6) topics designated for this deposition.
Mathew Littman (April 12, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Littman's deposition that may confuse the issues or mislead the jury as to his testimony.

Stephanie Smith (April 12, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Ms. Smith's deposition that may confuse the issues or mislead the jury as to her testimony.
Andrew Sturmfels (February 10, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Sturmfels's deposition that may confuse the issues or mislead the jury as to his testimony.
John Thomas (January 11, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Thomas's deposition that may confuse the issues or mislead the jury as to his testimony.
Michael Wong (January 19, 2021)	JPMC objects under Fed. R. Evid. 106 to any incomplete portions of Mr. Wong's deposition that may confuse the issues or mislead the jury as to his testimony.

Dated: April 29, 2021

Respectfully submitted,

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

/s/ Meredith K. Loretta

Meredith K. Loretta (92369)
Whitney Russell (*pro hac vice*)
Albinas J. Prizgintas (*pro hac vice*)
1875 Pennsylvania Avenue N.W.
Washington, DC 20006
Tel.: (202) 663-6981
meredith.loretta@wilmerhale.com

Alan E. Schoenfeld (*pro hac vice*)
Marissa W. Medine (*pro hac vice*)
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Tel.: (212) 230-8800
alan.schoenfeld@wilmerhale.com

Felicia Ellsworth (*pro hac vice*)
60 State Street
Boston, MA 02109
Tel.: (617) 526-6000
felicia.ellsworth@wilmerhale.com

Margarita M. Botero (*pro hac vice*)
1225 17th Street, Suite 2600
Denver, CO 80202
Tel.: (720) 274-3135
margarita.botero@wilmerhale.com

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

CERTIFICATE OF SERVICE

I certify that on this 29th 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

Meredith K. Loretta
1875 Pennsylvania Avenue N.W.
Washington, DC 20006
Tel.: (202) 663-6981
meredith.loretta@wilmerhale.com