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 MEMORANDUM IN OPPOSITION TO CHAIN BRIDGE BANK, N.A.'S 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 Memorandum in Opposition to Chain Bridge's Motion for Summary Judgment.

2. Attached hereto as Exhibit 1 is a true and accurate copy of excerpts from the transcript of the deposition of Timothy Coffey, taken on February 11, 2021.

3. Attached hereto as Exhibit 2 is a true and accurate copy of excerpts from the transcript of the deposition of Rakesh Korpal, taken on February 9, 2021.

4. Attached hereto as Exhibit 3 is a true and accurate copy of a news article titled "CA lawmakers told half-billion dollar Blue Flame mask deal thwarted by suspicious bankers" dated May 11, 2020 (updated September 17, 2020), published by CalMatters online.

5. Attached hereto as Exhibit 4 is a true and accurate copy of excerpts from the Expert Report of Thomas C. Baxter, Jr. dated March 12, 2021.

6. Attached hereto as Exhibit 5 is a true and accurate copy of excerpts from the transcript of the deposition of John J. Brough, taken on February 2, 2021.

7. Attached hereto as Exhibit 6 is a true and accurate copy of an email titled "Blue Flame Medical LLC - Wire Transfer" from Ethan Bearman to mcole@chainbridgebank.com dated March 26, 2020 at 12:14:28 p.m., produced by Chain Bridge, bearing Bates number CBB00001385.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 20, 2021
Washington, DC

/s/ Meredith K. Loretta
Meredith K. Loretta