

EXHIBIT 130

From: Burke, Donald <dburke@robbinsrussell.com>
Sent: Thursday, April 15, 2021 3:26 AM
To: Mitchell, Jason
Cc: Orseck, Gary; Madden, Matthew; Esbrook, Leslie; Forstein, Carolyn; Ferguson, Zachary N; White, Pete; Ketcham-Colwill, Greg; Ukabiala, Ekenedilichukwu (Keni); Gussman, Bill; Schoenfeld, Alan E; Loretta, Meredith K; Prizgintas, Albinas; Botero, Margarita
Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Jason,

In response to your follow-up questions –

- We confirm that the “Account Inquiry” screen does not contain responsive information concerning credits, debits, or other account actions relating to the wire transfer or other activity relating to Blue Flame’s account. I note that Defendants have produced certain information from the Blue Flame account’s Maintenance History view, which is accessible via a link from the Account Inquiry screen, at CBB00004468.
- As for the native transaction data files sought in Request No. 2 of Plaintiff’s Second Set of Requests for Production, Defendants have been unable to identify any source of potentially responsive information that would not be duplicative of the information available to Chain Bridge through the SilverLake Xperience system that has previously been searched in response to Plaintiff’s document requests. In particular, we have confirmed with Chain Bridge’s computing-services provider that any historical back-ups of the Bank’s system do not contain incremental information relating to the Blue Flame account or the wire transfer beyond what is currently available in the Bank’s live record. We have also confirmed that Chain Bridge’s computing-services provider would not have access to additional responsive information beyond what Chain Bridge is able to access.
- We confirm that native transaction log files of the sort sought in Request No. 3 of Plaintiff’s Second Set of Requests for Production do not persist for more than a few days and are not included as part of any periodic back-ups of the Bank’s system. Thus, there are no such records available for the March 26, 2020 time period sought in Request No. 4.
- As for Request No. 4 of Plaintiff’s Second Set of Requests for Production, Defendants have conducted a search for the requested software-version information and have not identified responsive information for the time period sought by Plaintiff’s request.

Regards,
Donald

Donald Burke
t: 202.775.4491 | c: 703.470.6900

From: Mitchell, Jason <Jason.Mitchell@srz.com>
Sent: Tuesday, April 13, 2021 2:30 PM
To: Burke, Donald <dburke@robbinsrussell.com>
Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie

<LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; Ferguson, Zachary N <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>

Subject: Re: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Donald,

We certainly disagree with your spin on the facts and the evidence produced by your client showing that Blue Flame's account was credited with the wire amount, but this is not a productive forum for that discussion. Please confirm that the "Account inquiry" screen in Xperience mentioned in my email below, which is where Ms. Schoeppe testified she clicked on the wire to view the information reflected in the email bearing beginning bates stamp CBB00002673, does not contain any responsive information concerning the wire transfer or Blue Flame Medical's account. If it does contain responsive information, please either produce it or identify where it has already been produced. In an effort to close the loop regarding Plaintiff's Second Set of Requests for Production, following up on our meet and confer call, please confirm whether Chain Bridge Bank's computing services provider confirmed that the intra-day transactional data related to Blue Flame's account and/or the Wire Transfer sought in, e.g., Request Nos. 2 and 3 of Plaintiff's Second Set of Requests for Production was not retained/was too "ephemeral" for Defendants or their computing services provider to be able to produce. Also, please confirm whether Defendants possess and are able to produce documents sufficient to show or otherwise disclose the information in Request No. 4 of Plaintiff's Second Set of Requests for Production.

Jason T. Mitchell
Special Counsel
202.729.7467
my pronouns: he/him/his

Schulte Roth & Zabel LLP
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On Apr 12, 2021, at 7:55 PM, Burke, Donald <dburke@robbinsrussell.com> wrote:

Jason:

I'd direct you to the document produced by Chain Bridge at Bates number CBB00002608. This is a report from the SilverLake Xperience interface showing the transaction history for Blue Flame Medical LLC's deposit account. This report would show credits or debits to Blue Flame's account, if any existed. No records are displayed on the report because there were no credits or debits to Blue Flame's account.

Regards,
Donald

Donald Burke
t: 202.775.4491 | c: 703.470.6900

From: Mitchell, Jason <Jason.Mitchell@srz.com>

Sent: Friday, April 9, 2021 10:59 PM

To: Burke, Donald <dburke@robbinsrussell.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; Ferguson, Zachary N <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>

Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Donald,

Based on our review of this production, it does not appear to include a transactional record or report for Blue Flame Medical's depository account at Chain Bridge Bank showing all credits, debits, or other account actions in connection with the wire transfer (or any other activity concerning the account, if any). Such a record/report would be responsive to multiple RFPs served by Plaintiff in this action, including most recently Requests 1 and 2 in Plaintiff's Second Set of Requests for Production, as we discussed during the meet and confer call on April 5. Without limiting our requests, we note that the information we are seeking may be (or may previously have been) available in the SilverLake Xperience interface based on our review of the email bearing beginning bates stamp CBB00002673 and Heather Schoeppe's explanation during her deposition of various portions of the screenshot from Xperience embedded in her email, such as in the "account inquiry" section, "history" section, or otherwise. Please confirm whether such a record or report can be generated and if Defendants will produce it. If you believe that such a document already has been produced, please identify it.

Jason T. Mitchell

Special Counsel

202.729.7467

my pronouns: he/him/his

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From: Burke, Donald <dburke@robbinsrussell.com>

Sent: Friday, April 9, 2021 8:18 AM

To: Mitchell, Jason <Jason.Mitchell@srz.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; Ferguson, Zachary N <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>

Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Jason – Following up on our discussion earlier this week, I'm attaching a small informal production of documents. We will follow up with a Bates-labeled version of these materials.

Regards,
Donald

Donald Burke

t: 202.775.4491 | c: 703.470.6900

From: Burke, Donald

Sent: Monday, April 5, 2021 8:43 AM

To: Mitchell, Jason <Jason.Mitchell@srz.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; Ferguson, Zachary N <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>

Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Jason –

We can be available for a call this afternoon at 2:30 pm or thereafter. Please let us know if that works on your end.

Regards,
Donald

Donald Burke

t: 202.775.4491 | c: 703.470.6900

From: Mitchell, Jason <Jason.Mitchell@srz.com>

Sent: Sunday, April 4, 2021 9:27 PM

To: Burke, Donald <dburke@robbinsrussell.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; Ferguson, Zachary N <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>

Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Counsel,

I write to follow up on my correspondence below. Please let us know when you are available to confer regarding Defendants' objections.

Thanks

Jason T. Mitchell
Special Counsel
202.729.7467
my pronouns: he/him/his

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From: Mitchell, Jason
Sent: Saturday, March 27, 2021 2:47 PM
To: Burke, Donald <dburke@robbinsrussell.com>
Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>; 'Ferguson, Zachary N' <znferguson@robbinsrussell.com>; White, Pete <Pete.White@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>
Subject: RE: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

Counsel,

Please see the attached correspondence in response to Defendants' Responses and Objections to Plaintiff's Second Set of RFPs.

Jason T. Mitchell
Special Counsel
202.729.7467
my pronouns: he/him/his

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From: Ferguson, Zachary N <znferguson@robbinsrussell.com>
Sent: Tuesday, March 16, 2021 9:20 PM
To: White, Pete <Pete.White@srz.com>; Mitchell, Jason <Jason.Mitchell@srz.com>; Ketcham-Colwill, Greg <Gregory.Ketcham-Colwill@srz.com>; Ukabiala, Ekenedilichukwu (Keni) <Ekenedilichukwu.Ukabiala@srz.com>; Gussman, Bill <Bill.Gussman@srz.com>; Schoenfeld, Alan E <Alan.Schoenfeld@wilmerhale.com>; Loretta, Meredith K <Meredith.Loretta@wilmerhale.com>; Prizgintas, Albinas <Albinas.Prizgintas@wilmerhale.com>; Botero, Margarita <Margarita.Botero@wilmerhale.com>
Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Madden, Matthew <mmadden@robbinsrussell.com>; Burke, Donald <dburke@robbinsrussell.com>; Esbrook, Leslie <LEsbrook@robbinsrussell.com>; Forstein, Carolyn <cforstein@robbinsrussell.com>
Subject: Blue Flame v. Chain Bridge: Defendants' Responses and Objections to Plaintiff's Second Set of RFPs

-CAUTION: EXTERNAL EMAIL from znferguson@robbinsrussell.com
Do not click any links or open any attachments unless you are expecting the email and know the content is safe.

Counsel,

Attached are Defendants' Responses and Objections to Plaintiff's Second Set of Requests for Production of Documents.

Best,
Zach

<image001.jpg>

Zachary N. Ferguson
2000 K Street NW, 4th Floor, Washington DC 20006
P 202.471.3902 | C 360.433.5937
znferguson@robbinsrussell.com

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