

EXHIBIT 114

From: Henry Huang <henryh@chcgp.com>
Sent: Thursday, March 25, 2021 8:08 PM
To: Madden, Matthew
Subject: Re: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Hi Matthew,

Apologies for the belated response. I am currently still in China and will be for the near future.

Thank you.

Henry

<mmadden@robbinsrussell.com> wrote:

Mr. Huang,

I am following up on my prior emails to you. Please let us know whether you accept service of the document subpoena that was attached to my email last Friday, and is attached again to this email. Please also confirm that you will include us in any discussions you have with Blue Flame Medical concerning your deposition that we subpoenaed last December. If the circumstances that have made you unavailable to testify have now changed, then we intend to conduct your deposition pursuant to that subpoena and want to discuss scheduling and logistics with you.

Regards,

Matt

MATTHEW MADDEN

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street NW, Washington, DC 20006

P 202.775.4529 mmadden@robbinsrussell.com

From: Madden, Matthew
Sent: Friday, March 19, 2021 8:24 PM

To: Henry Huang <henryh@chcgp.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Burke, Donald <dburke@robbinsrussell.com>

Subject: RE: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Mr. Huang,

I write further to my email earlier this week. Attached is a subpoena for documents that we wish to receive from you prior to your deposition in this case. We are happy to discuss the specifics with you at your convenience. Please let me know that you accept email service of this subpoena. And, once again, if you have retained new counsel in connection with this matter, please direct us to that person.

We also reiterate our wish to participate in any further discussions involving the logistics for your deposition in this matter.

Regards,

Matt

MATTHEW MADDEN

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street NW, Washington, DC 20006

P 202.775.4529 mmadden@robbinsrussell.com

From: Madden, Matthew

Sent: Wednesday, March 17, 2021 10:23 PM

To: Henry Huang <henryh@chcgp.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Burke, Donald <dburke@robbinsrussell.com>

Subject: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Mr. Huang,

I write regarding your potential deposition in this matter.

Recall that you received a deposition subpoena from us dated December 16, 2020. Shortly thereafter, your counsel, Mr. Koh, told us that you were unable to provide a deposition in this case because of Chinese law. Mr. Koh has confirmed that he no longer represents you in this matter, but please let me know if you have other counsel who does.

Blue Flame Medical's counsel told us earlier today that you have had direct discussions with Blue Flame principal John Thomas, and are now considering travelling outside of China to give testimony at Blue Flame's request. Because of our prior subpoena for your testimony, we ask to be included in future discussions concerning your potential deposition in this case. Among other things, the significant time difference between your location and ours will require us to confer on reasonable arrangements for the seven hours of testimony allowed by the applicable rules, possibly spread over separate sessions on consecutive days.

Finally, we will require a production of documents and other material from you in advance of your deposition. Last December, we held off on seeking such documents from you in response to Mr. Koh's December 22 email. Please let us know if you will accept email service of that document subpoena.

Regards,

Matt

MATTHEW MADDEN

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street NW, Washington, DC 20006

P 202.775.4529 mmadden@robbinsrussell.com

From: 高亨植 <hskoh@winteam500.com>

Sent: Tuesday, December 22, 2020 2:01 AM

To: Madden, Matthew <mmadden@robbinsrussell.com>

Cc: henryh <henryh@chcgp.com>; wujin <wujin@winteam500.com>; Orseck, Gary <gorseck@robbinsrussell.com>; Burke, Donald <dburke@robbinsrussell.com>; Ferguson, Zachary <zferguson@robbinsrussell.com>

Subject: Re:Fw: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Dear Mr. Madden,

We are legal counsel for Mr. Henry Huang and he has asked us to respond to your request for a deposition to be held via Zoom on January 19. While Mr. Huang is sympathetic to your client's case and is not personally opposed to giving his testimony, he will be unable to do so as Chinese law prohibits it. The US State Department website, <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/China.html>, states the following regarding the taking of deposition in China:

"China does not permit attorneys to take depositions in China for use in foreign courts. Under its Declarations and Reservations to the Hague Evidence Convention and subsequent diplomatic communications, China has indicated that taking depositions, whether voluntary or compelled, and obtaining other evidence in China for use in foreign courts may, as a general matter, only be accomplished through requests to its Central Authority under the Hague Evidence Convention. Consular depositions would require permission from the Central Authority on a case by case basis and the Department of State will not authorize the involvement of consular personnel in a deposition without that permission. Participation in such activity could result in the arrest, detention or deportation of the American attorneys and other participants."

Specifically, Article 277 of China's Civil Procedure Law provides:

"The request for and provision of judicial assistance shall be conducted through the channels stipulated in the international treaties concluded or acceded to by the People's Republic of China; where no treaty relations exist, the request for and provision of judicial assistance shall be conducted through diplomatic channels.

The embassy or consulate in the People's Republic of China of a foreign state may serve documents on, investigate, and take evidence from its citizens, provided that law of the People's Republic of China is not violated and that no compulsory measures are adopted.

Except for the circumstances set forth in the preceding paragraph, no foreign agency or individual may, without the consent of the competent authorities of the People's Republic of China, serve documents, carry out an investigation or take evidence within the territory of the People's Republic of China."

If you wish to discuss this matter further, please do not hesitate to contact us. Thanks.

Peter HS Koh

Senior Foreign Lawyer (California Bar)

Shanghai Yingdong Law Firm, Yinghe Law Group

Mobile: +86 185 0165 9714

29 Fl., Greentech Tower, 436 Hengfeng Road, Shanghai 200071, China

----- Forwarded Message -----

From: Madden, Matthew <mmadden@robbinsrussell.com>

To: Henry Huang <henryh@chcgp.com>

Cc: Orseck, Gary <gorseck@robbinsrussell.com>; Burke, Donald <dburke@robbinsrussell.com>;
Ferguson, Zachary <zferguson@robbinsrussell.com>

Sent: Thursday, December 17, 2020, 01:42:30 AM GMT+8

Subject: RE: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Mr. Huang,

Attached is a deposition subpoena to take your testimony via Zoom at 8:00 China Standard Time on January 19. We can discuss a different date if that is not convenient for you. We are based in Washington D.C., and so an early morning start, your time, works best for us. Once you have provided this subpoena to your counsel, please have your counsel reach out to me directly.

Thank you,

Matt

MATTHEW MADDEN

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street NW, Washington, DC 20006

P 202.775.4529 mmadden@robbinsrussell.com

From: Henry Huang <henryh@chcgp.com>
Sent: Wednesday, December 16, 2020 5:09 AM
To: Madden, Matthew <mmadden@robbinsrussell.com>
Cc: Burke, Donald <dburke@robbinsrussell.com>
Subject: Re: Deposition in Blue Flame Medical LLC v. Chain Bridge Bank, N.A.

Hi Matthew,

Sure, I am based in China. Feel free to send me the deposition via email. I will submit to our counsel here for review upon receipt.

Thank you,

Henry

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Wednesday, December 16, 2020, 3:10 AM, Madden, Matthew <mmadden@robbinsrussell.com> wrote:

Mr. Huang,

I represent the defendants in a lawsuit pending in federal court in Alexandria, Virginia, titled *Blue Flame Medical, LLC vs. Chain Bridge Bank, N.A.* Blue Flame Medical's complaint against my clients is attached.

Blue Flame Medical and Chain Bridge Bank have both identified you as a person who is likely to have discoverable information that it may use to support its claims. We intend to take your deposition in connection with this matter. That deposition would take place via Zoom at a time that is convenient for you during January. Please let us know if we can send you a subpoena for that deposition by email instead of by formal service of process. And if you are represented by a lawyer in connection with this matter, please ask your lawyer to contact me so that I can speak with him or her directly.

Very best regards,

MATTHEW MADDEN

Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP

2000 K Street NW, Washington, DC 20006

P 202.775.4529 mmadden@robbinsrussell.com