

EXHIBIT 115

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 (Alexandria Division)
4 - - - - - X
5 BLUE FLAME MEDICAL LLC, :
6 Plaintiff, :
7 v. : Civil Action No.
8 CHAIN BRIDGE BANK, N.A., : 1:20-cv-00658
9 JOHN J. BROUGH and DAVID M. :
10 EVINGER, : CONFIDENTIAL
11 Defendants. :
12 _____ :
13 CHAIN BRIDGE BANK, N.A., :
14 Third-Party Plaintiff, :
15 v. :
16 JPMORGAN CHASE BANK, N.A., :
17 Third-Party Defendant. :
18 - - - - - X

19 Remote Deposition
20 Tuesday, January 12, 2021
21 Videotape Deposition via Zoom of MIKE
22 GULA, a witness herein, called for examination by

1 counsel for Defendant/Third-Party Plaintiff in the
2 above-entitled matter, pursuant to notice, the
3 witness being duly sworn by MARY GRACE CASTLEBERRY, a
4 Notary Public in and for the District of Columbia,
5 taken at 10:05 a.m. EST, Tuesday, January 12, 2021,
6 and the proceedings being taken down by Stenotype by
7 MARY GRACE CASTLEBERRY, RPR, and transcribed under
8 her direction.

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1 MR. WHITE: Sometimes it takes a couple of
2 tries. That's what he was telling me.

3 THE WITNESS: This is Number 59; is that
4 correct?

5 MR. ORSECK: Fifty-nine, yes.

6 MR. WHITE: Right, right.

7 THE WITNESS: Do I have the right
8 document, Lindsay Angerholzer, Friday, March 27th?

9 MR. ORSECK: Right.

10 THE WITNESS: I'm opening it. One second.

11 MR. WHITE: I believe he has another copy
12 of the same document on the computer you can probably
13 see him holding.

14 THE WITNESS: I can download it now.

15 MR. WHITE: Okay. It is the exhibit.

16 BY MR. ORSECK:

17 Q. Do you have it?

18 A. I do. I'm reading it on another computer
19 because mine was not downloading.

20 Okay. I've read the document.

21 Q. On the first page of Exhibit 59, there are
22 a couple of emails. The bottom one is from Lindsay

1 Angerholzer on Friday, March 27th at 10:25 a.m. to
2 you. Who is Lindsay Angerholzer?

3 A. She's a political colleague that I know in
4 Washington.

5 Q. Had you attempted to establish some
6 relationship with her relating to Blue Flame Medical?

7 A. She reached out to me to be a part of it.

8 Q. This email at the, bottom, I think,
9 consists of questions to her -- numbered questions --
10 questions from her that are numbered and then your
11 responses under each individual question; is that
12 correct?

13 A. Correct.

14 Q. The first question asks, "Can you walk me
15 through your relationship with Henry again and how
16 you know him?" That's Henry Huang?

17 A. Correct.

18 Q. "This will come up and I'll have to
19 explain." And then I believe your answer is, "My
20 business partner grew up with Henry and his best
21 friend. Henry is a Chinese American."

22 Have I approximately read that correctly?

1 A. Yes.

2 Q. Was -- were John Thomas and Henry Huang
3 best friends?

4 A. You would have to ask John, but that was
5 my impression, that they were very good friends.

6 Q. Question 6 asks, "How much of their
7 product has landed in the US in the last 14 days?
8 How many of your leads have received their orders?"

9 And you respond, "Landing on Monday. It
10 takes 8-10 days for big orders to clear customs on
11 both ends," right?

12 A. That's what -- yes.

13 Q. Was it your understanding at the time, as
14 of March 27th, that none of Henry's product had
15 landed in the United States at that point?

16 A. On March 27th, yes, that's why I said
17 landing on Monday.

18 MR. ORSECK: Can we pull up tab 306,
19 please? Tab 306 will be Defendant's Exhibit 60.

20 (Defendant's Exhibit No. 60 was
21 marked for identification.)

22 THE WITNESS: I have it opened.

1 BY MR. ORSECK:

2 Q. Okay. Tell me when you're ready.

3 A. Okay.

4 Q. Exhibit 60 is an email Bates BFM 45714.

5 It's two emails. There's one from Zach Hargett to
6 you on April 14th and another one back from you to
7 him also on April 14th. Who is Zach Hargett?

8 A. It appears to be a prospective client.

9 Q. You say to him, "Yes, we would love to
10 help. Please see attached on capacity and more
11 information on our entire process." And there are
12 several attachments to this that I'm not going to ask
13 you about.

14 And then you say, "Also, any vendor who
15 can promise anything under 14 days is flat-out 100
16 percent lying." Have I read that correctly?

17 A. That's what the email says.

18 Q. Was that your belief at the time?

19 A. On April 14th.

20 Q. What was the basis of that belief?

21 A. Speaking with multiple suppliers from
22 around the world.

1 Q. You go on to say, "No one has product in
2 the states." Was that your belief at the time?

3 A. On April 14th.

4 Q. And was that on the basis of speaking with
5 multiple suppliers?

6 A. On that particular day, yes.

7 Q. I don't follow. I understand that was
8 your belief on that particular day. I'm asking you
9 the basis for your belief.

10 A. Yes, talking to suppliers.

11 Q. Okay. Then you say, "If they do, they
12 have distributed this. I hear this ask all the time
13 and if you are talking with someone who says they can
14 get something out of China in under 13 days, run
15 away."

16 Have I read that correctly?

17 A. Yes.

18 Q. Can you explain what you meant by that?

19 A. Yes. There were a lot of people
20 overpromising, and at the time of the middle of April
21 was the height for the spring of supplying PPE. So
22 we wanted to be very cognizant, when we were speaking