EXHIBIT 18

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

BLUE FLAME MEDICAL LLC, Plaintiff,	:	
v.	:	Civil Action No.
CHAIN BRIDGE BANK, N.A., JOHN J. BROUGH and DAVID M. EVINGER, Defendants.	:	1:20-cv-00658
	:	CONFIDENTIAL
CHAIN BRIDGE BANK, N.A., Third-Party Plaintiff,	:	
v.	:	
JPMORGAN CHASE BANK, N.A., Third-Party Defendant.	:	

Remote Deposition
Tuesday, January 19, 2021

Videotaped Deposition via Zoom of MICHAEL WONG, a witness herein, called for examination by

Flame Medical's shipping costs, right?

A. Yes, sir.

Q. Do you see there's a line for shipping instructions in the middle of the document?

A. Which section are you looking at, sir?

Q. Yeah. It's roughly in the middle of Exhibit 43, there's a line labeled shipping instructions, just above the terms and conditions.

A. Yes, sir.

Q. You see that now?

A. Yes, sir.

Q. It has a required delivery date of April 3rd, 2020. Do you see that?

A. Yes, sir.

Q. Did that convey that some or all of the masks being ordered were required to be delivered by April 3rd?

A. Yes, sir.

Q. And what was your understanding of that requirement as related to this purchase order?

A. At least the initial shipment of the masks should have been received by April 3rd. I believe

that's the eight days from the issuance of the purchase order.

Q. And was it your understanding that if an initial shipment of masks was not delivered by April 3rd, that would have been a breach of your agreement with Blue Flame Medical?

A. Yes, sir.

MS. PORTER: Objection. Calls for a legal conclusion.

BY MR. MADDEN:

Q. And then next to the required delivery date, there's a checkmark for FOB destination.

Do you see that?

A. Yes, sir.

Q. And what does that signify?

A. Freight on board destination.

Q. And what does that -- what does that mean?

A. The legal meaning of it I don't know myself.

Q. And then a little further down the page, do you see there's a section for procurement methods?

A. Yes, sir.