EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

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BLUE FLAME MEDICAL LLC, : Civil Action No.

Plaintiff, : 1:20-CV-00658

vs. :

CHAIN BRIDGE BANK, N.A., :
JOHN J. BROUGH, and :
DAVID M. EVINGER, :

Defendants. :

- - - - - - - - - - - - - - - - X

CHAIN BRIDGE BANK, N.A., :

Third-Party Plaintiff, :

vs. :

JPMORGAN CHASE BANK, N.A., :

Third-Party Defendant. :

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CONFIDENTIAL

Remote Videotaped Deposition Of ETHAN BEARMAN

Thursday, January 21, 2021

9:34 a.m. (EST)

Reported by: Dana C. Ryan, RPR, CRR

A I recall that to be true, yes.
Q Do you have an understanding as to why Blue Flame Medical was formed?
MR. GUSSMAN: Objection to form.
THE WITNESS: I -- I'm aware of the request, and, yes.
BY MR. MADDEN:
Q And what was the reason for forming Blue Flame Medical?
A To begin to become -- excuse me. I'm trying to think of how to phrase that correctly.
They --
MR. GUSSMAN: Just note my objection to the form.
I'm sorry. Go ahead.
THE WITNESS: Okay. Mike and John, the co-members of Blue Flame Strategies and the co-members and founders of Blue Flame Medical, wanted to start selling PPE, really moving product, becoming a major distributor. And they wanted a separate entity for that, separate from the consulting and, kind of, referral business

that was Blue Flame Strategies; therefore, it required a new entity to do that, a new company.

BY MR. MADDEN:

Q Was there any reason that Blue Flame Strategies could not have sold PPE to customers?

MR. GUSSMAN: Objection to form.

THE WITNESS: No.

BY MR. MADDEN:

Q And is there any reason that Blue Flame Strategies could not have purchased PPE from suppliers?

MR. GUSSMAN: Objection to form.

THE WITNESS: No.

BY MR. MADDEN:

Q And at the time of forming Blue Flame Medical, am I right that Blue Flame Strategies didn't close down; correct?

It continued in operation?

A Continues to exist.

Q Okay. Okay.

MR. MADDEN: Now, I'm going to turn to what we're marking as Exhibit 73, which is a