EXHIBIT 6

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

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

Remote Deposition
Monday, March 29, 2021

Deposition via Zoom of DANIEL KIM, a witness herein, called for examination by counsel for

I'm trying to figure out the direct reports. Chuck Tobia, who's the deputy director for strategic planning. Monica Hassan, the deputy director for public affairs. Anita Kung, who is my special assistant. Ida Clair was the acting state architect over the Division of State Architect. Juan Vasquez, who's the deputy director for special projects.

How many is that?

Q. I likewise haven't been counting, but if those are the ones you recall, that's all we're asking for.

A. Yeah.

Q. And why did you leave the Department of General Services?

A. I left because I found a position in Yolo County that fit my skill sets that was a great opportunity to be working under a really reputable leader for more pay than I was making at the state.

Q. And turning back to March of 2020, what was the Department of General Services' role in procuring personal protective equipment for the state of California?

A. Our role was to be one of a number of departments that were part of the statewide task force for logistics and commodity movement. We had a number of different roles in that capacity. In terms of PPE, we were purchasing PPE on behalf of the state.

Q. Did the Department of General Services play a role in vetting potential PPE vendors?

A. Yes.

Q. What was that role?

A. Our staff, who were doing procurement along with other staff who were part of the logistics commodity movement team, were doing some vetting to determine whether the vendors met the qualifications necessary to purchase from.

Q. And what were the qualifications that were necessary to purchase from in March 2020?

A. I don't know the specifics, but I do know that our process for vetting was much more expedited than it would normally have been, outside of an emergency.

Q. And who in your office was primarily

responsible for that work?

A. Our chief procurement officer was largely responsible for that.

Q. And who was that in March 2020?

A. Angela Shell.

Q. And you mentioned that the department's rollout of the vetting process was abbreviated from what the usual vetting procedure would be. What is DG -- outside of the context of the pandemic, how do vetting procedures typically work for procurement at DGS?

A. And I don't know the specifics of the vetting procedure. I just know that the process is much more time-intensive and rigorous.

Q. Was vetting vendors difficult at the start of the COVID-19 pandemic in March 2020?

A. Yes.

Q. And why was that?

A. We were asked to purchase PPE in a very expedited time frame. Typically a procurement that the state conducts takes anywhere from six months to 12 months. So we had days rather than months or a

A. I'll take your word for it, yes.

Q. Was getting a delivery schedule from Mr. Thomas in which California would have all 100 million masks within a month important to you?

MR. KETCHAM-COLWILL: Objection. Vague.

MS. PORTER: Objection. Asked and answered.

THE WITNESS: As I mentioned earlier, it was very important for the state of California to get N95 masks as soon as possible to save as many lives as possible.

BY MS. FORSTEIN:

Q. And you said earlier that that meant a matter of days as opposed -- or weeks possibly as opposed to a matter of months; is that right?

A. Yes.

MS. PORTER: Objection. Asked and answered.

BY MS. FORSTEIN:

Q. And looking back at the grid, the grid that Mr. Thomas sent you indicated that two suppliers would be supplying all of these 100 million masks; is

that right?

MS. PORTER: Objection. The document speaks for itself.

THE WITNESS: To that point, I'm just verifying what is on the text because, frankly, I don't recall what happened a year ago. But based on the text, it appears that. But I have no recollection of the two suppliers.

BY MS. FORSTEIN:

Q. And -- understood and appreciate that clarification. When you received this schedule on the evening of March 25th, had you previously received a delivery schedule of any kind from Blue Flame Medical?

A. I personally had not.

Q. And did Mr. Thomas tell you that he asked Blue Flame Medical's lawyer to create this delivery schedule only after he spoke with you on the evening of March 25th?

A. I don't recall, but I understood that he was putting together a schedule at my request.

Q. And did Mr. Thomas tell you that Blue