EXHIBIT 85

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

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

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. :

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

CONFIDENTIAL

Remote Videotaped Deposition Of ETHAN BEARMAN

Thursday, January 21, 2021

9:34 a.m. (EST)

Reported by: Dana C. Ryan, RPR, CRR

Q And that was in early February of 2020?
A I don't recall if it was early February, but it was February 2020.
Q Okay. And at that time, what did you understand to be Blue Flame Strategies' business?
A I understood it to be consulting and political strategy helping clients.
Q And helping what kinds of clients?
A I don't -- I don't know that I knew in February 2020.
Q Was there a time when you came to learn what kinds of clients Blue Flame Strategies intended to help?
A Yes.
Q And about how long after filing paperwork in the State of Delaware did you come to that understanding?
A I don't recall specifically. It could have been days. It could have been weeks.
Q Okay.
A But in that time -- days or weeks afterwards.

Q Whenever it was that you came to understand the kinds of clients that Blue Flame Strategies intended to help, what did you -- what understanding did you come to?

A It was a broad range of clients. I -- I -- I'm not sure I know how to tell you exactly what I learned at that point in time. It -- it was -- I know names of some companies, but I don't know how to categorize it the way you're asking me. I'm just not sure.

Q Well, what were the names of some of the companies?

A So apologies. I'm not sure if I'm going to mix up clients versus other -- I'm going to use clients in a very generic sense, so it would be Velox Medical, NeVap or NeVap, Glymate. There were a number of hospitals. There were -- I want to say that there was discussion of government entities even -- but in that -- that time frame that we're generally speaking, like I said, it's this broad range that's hard to categorize.

That is about the best I can do right now.

Q Okay. And, generally speaking, what was Blue Flame Strategies going to help these clients with?

A There were kind of two primary functions, to the best of my recollection, which were, one, should an entity receive grant money, they were going to help them manage the grants and kind of keep track of it for distribution purposes.

And the other was connecting suppliers -- excuse me, not -- not limited to PPE but medical supply companies with buyers.

Q And the companies you listed, were those suppliers, buyers or some of both?

MR. GUSSMAN: Objection to form.

THE WITNESS: I mean, all three that you said and additional categories.

BY MR. MADDEN:

Q Okay. You mentioned Velox Medical?

A Yes.