EXHIBIT 132

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

BY MR. MITCHELL:

Q. And do you recall that those model numbers had been approved by the Department of Public Health?

MS. PORTER: Objection. Asked and answered.

THE WITNESS: I believe that's true.

BY MR. MITCHELL:

Q. Mr. Wong, if Blue Flame had delivered 100 million N95 NIOSH certified masks that had been approved by the Department of Public Health to the state of California as agreed, would you have accepted those masks?

MS. PORTER: Objection. Calls for speculation.

THE WITNESS: If we received the masks that were agreed upon, we would have accepted them.

BY MR. MITCHELL:

Q. All right. Mr. Wong, I'd like to turn your attention back to the invoice which is Defendant's Exhibit 20. And I want to ask you about the invoice itself, in particular, the terms and it's at the top right portion of the document. It says