

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

ANDREA ROSSI and LEONARDO )  
CORPORATION, )

Plaintiffs, )

v. )

THOMAS DARDEN; JOHN T. VAUGHN, )  
INDUSTRIAL HEAT, LLC; IPH )  
INTERNATIONAL B.V.; and )  
CHEROKEE INVESTMENT PARTNERS, )  
LLC, )

Defendants. )

CASE NO. 1:16-cv-21199-CMA

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INDUSTRIAL HEAT, LLC and IPH )  
INTERNATIONAL B.V., )

Counter-Plaintiffs, )

v. )

ANDREA ROSSI and LEONARDO )  
CORPORATION, )

Counter-Defendants, )

and )

J.M. PRODUCTS, INC.; HENRY )  
JOHNSON; FABIO PENON; UNITED )  
STATES QUANTUM LEAP, LLC; )  
FULVIO FABIANI; and "JOHN DOE" )  
a/k/a "James A. Bass", )

Third-Party Defendants. )

**NOTICE OF FILING PROPOSED  
ORDER ON DISCOVERY**

In compliance with the Court's request, Defendants Thomas Darden, John T. Vaughn, Industrial Heat, LLC, IPH International, B.V., and Cherokee Investment Partners, LLC, hereby give notice of filing the Proposed Order on Discovery.

Dated: January 12, 2017.

Respectfully submitted,

/s/ Christopher R. J. Pace

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*Attorneys for Defendants/Counter-Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 12, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel or parties of record.

*/s/ Christopher M. Lomax*

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Christopher M. Lomax