

Exhibit 24

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

CASE NO. 1:16-CV-21199-CMA/O'Sullivan

ANDREA ROSSI, *et al.*,

Plaintiffs,

v.

THOMAS DARDEN, *et al.*,

Defendants,

_____ /

**ANDREA ROSSI AND LEONARDO CORPORATION'S RESPONSES TO
DEFENDANT INDUSTRIAL HEAT, LLC'S SECOND SET OF INTERROGATORIES
TO ANDREA ROSSI AND LEONARDO CORPORATION**

Plaintiffs, Andrea Rossi ("Rossi") and Leonardo Corporation ("Leonardo") (collectively, "Plaintiffs"), pursuant to Federal Rules of Civil Procedure 26, and 34, hereby respond to Defendant Industrial Heat, LLC's Second Set of Interrogatories to Andrea Rossi and Leonardo Corporation as follows:

I. PRELIMINARY STATEMENT

Plaintiffs provide these responses and objections ("Responses") without waiving any objections as to the admissibility in evidence of these Responses, the information produced pursuant to, or referenced in, these Responses, or the subject matter of the Request or of the information produced pursuant to, or referenced in these Responses. Plaintiffs' Responses are also subject to and without waiver of: (i) the right to object to other Discovery directed to the subject matter of the Request or Responses; (ii) the right to make additional objections or to seek protective orders; and (iii) the right to revise, correct, add to, or clarify the Responses or information referred to below in accordance with all applicable rules.

INTERROGATORY NO. 17: Please identify all “intellectual property,” “proprietary business and scientific information” and “trade secrets” referred to in paragraphs 94, 95 and 96 of the Complaint.

ANSWER: Plaintiffs object to Interrogatory No. 17 as it expressly requests that Plaintiffs identify and disclose trade secret information.

INTERROGATORY NO. 18: Please describe each action and each of the “extensive steps” taken by Rossi and Leonardo to prevent the unauthorized dissemination or disclosure of purportedly proprietary or trade secret information, as alleged in paragraphs 95 and 104 of the Complaint. Please identify in Your response each and every individual or entity that has signed a confidentiality or nondisclosure agreement with You related to the E-Cat or E-Cat IP.

ANSWER: Plaintiffs state that they have carefully crafted their public communications to only disclose information which had been previously made public by virtue of their patent filings. Plaintiffs object to the remainder of this interrogatory as it is not reasonably calculated to lead to the discovery of admissible evidence, and is protected proprietary business information/ trade secrets.

INTERROGATORY NO. 19: Please describe each measure, separately for each defendant, that You allege was taken by Darden, Vaughn, Cherokee, Industrial Heat, or IPH to steal the E-Cat IP or deprive Rossi and Leonardo of control of their trade secrets.

ANSWER: Defendants, collectively, have known as early as January of 2014 that they had no intention of making the contractually agreed-upon payment of Eighty Nine Million Dollars (\$89,000,000.00) to Plaintiffs. Notwithstanding such fact, Defendants, collectively, continue to use Plaintiff’s E-Cat IP and other trade secrets to solicit investments in excess of Fifty Million Dollars (\$50,000,000.00) to fund their LENR research, to hire “consultants” and other individuals to review Plaintiffs’ IP and trade secrets and to provide advice on the same, to file patents based upon Plaintiffs’ IP and trade secrets, and to otherwise assert that they “owned” Plaintiffs’ IP. Further, Defendants engaged in a strategy of silence and vagueness so as to trick Plaintiffs into continuing to perform tests and experiments on the E-Cat, knowing full well they had no intention