

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

**ANDREA ROSSI, et al.,**                    )  
  )  
          Plaintiffs,                        )  
v.    )  
  )  
**THOMAS DARDEN, et al.,**            )  
  )  
          Defendants.                        )  
\_\_\_\_\_                                  )

No. 16-cv-21199-CMA (JJO)

**DEFENDANTS’ NOTICE OF FILING  
POTENTIAL EXHIBITS FOR MARCH 28, 2017 HEARING**

Defendants Thomas Darden, John T. Vaughn, Cherokee Investment Partners, LLC, Industrial Heat, LLC, and IPH International, B.V., hereby give notice of filing the following potential exhibits for the hearing on Plaintiffs’ Appeal of Magistrate Judge O’Sullivan’s Ruling That Document IH-00079768 is a Privileged Communication, scheduled for Tuesday, March 28, 2017:

1. An excerpt of deposition testimony of Thomas Darden, attached hereto as Exhibit A;
2. The Declaration of Uzi Shaya, attached hereto as Exhibit B; and
3. A copy of Zalli Jaffe’s biography as reflected on the website of the Jaffe Fund & Co. law firm (<http://jfg.co.il/shneor-z-jaffe-partner/>), attached hereto as Exhibit C.

Dated: March 27, 2017

Respectfully submitted,

/s/ Christopher R. J. Pace

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 27, 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/ Erika S. Handelson  
Erika S. Handelson