

# **EXHIBIT B**

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)

DECLARATION OF UZI SHAYA

I, Uzi Shaya, declare as follows:

1. I submit this Declaration in response to the March 3, 2017 Declaration of Giuseppe Levi (the "Levi Declaration"). The Levi Declaration refers to a report entitled "Observation of Abundant Heat Production From a Reactor Device and of Isotopic Changes in the Fuel," published on October 6, 2014 (the "Lugano Report").

2. I am a citizen of Israel, and I was retained by attorney Schneor Z. (Zalli) Jaffe to assist Mr. Jaffe with his legal advice to Thomas Darden ("Darden"). In connection with that work, I met several times with Dr. Levi.

3. I never discussed with Dr. Levi any litigation anywhere, or the subject of him testifying in any legal proceeding anywhere. I never discussed with Dr. Levi the United States litigation involving Andrea Rossi ("Rossi") and Darden.

4. I never offered to pay Dr. Levi to recant or withdraw his support for the Lugano Report. I never discussed payment to Dr. Levi for any scientific work other than prospective work that he said that he was willing and wanted to perform. I never threatened Dr. Levi directly or indirectly.



5. I have read the Levi Declaration. As can be seen from various correspondence that *he sent me*, Dr. Levi very much wanted to proceed meeting with me, he asked to meet with me, and very much wanted to meet the clients. I never mentioned the identity of any client, and of course, neither directly or indirectly did I mention any legal proceedings. Copies of correspondence sent by Dr. Levi to me are attached to this declaration.

6. Dr. Levi's insinuation that he felt pressured is utterly uncalled for. *He* wanted to proceed negotiating with me, he was interested in cooperating with me. It was I who told Dr. Levi that my clients do not wish to proceed. Notwithstanding this notice, he did ask to meet me again.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

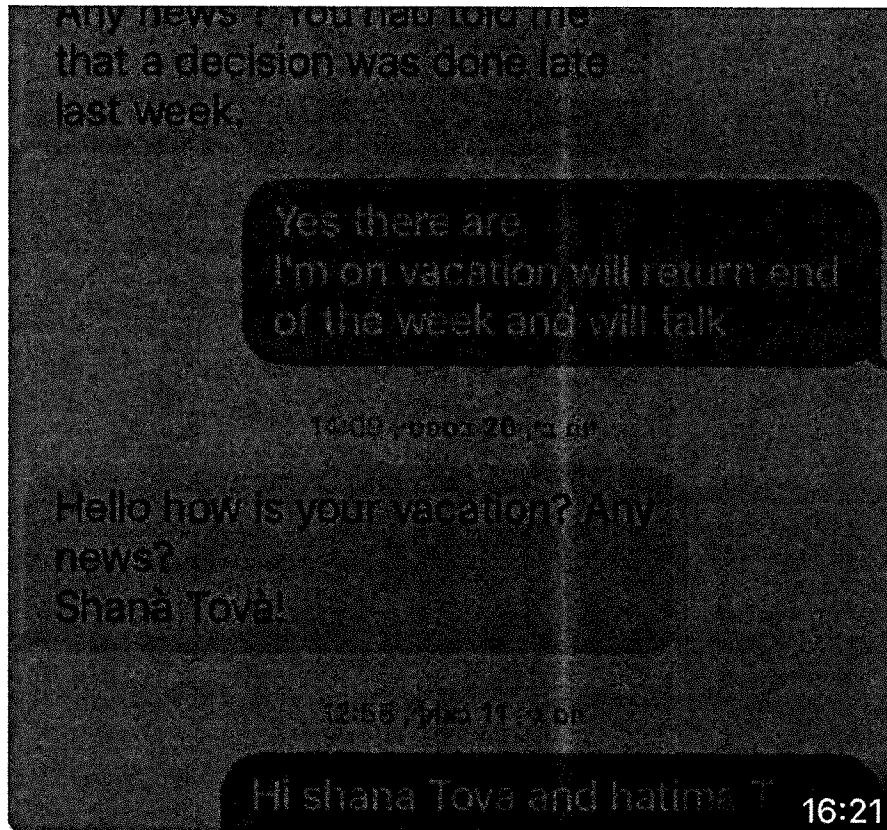
Executed this \_\_\_\_\_ day of March, 2017.

Uzi Shaya





Uzi Shaya  
online



postponed my arrival to the end of next week  
Chag sameach

Chag Sameach! Ok 🙏 let me know.

יום ו', 28 באוק, 14:56

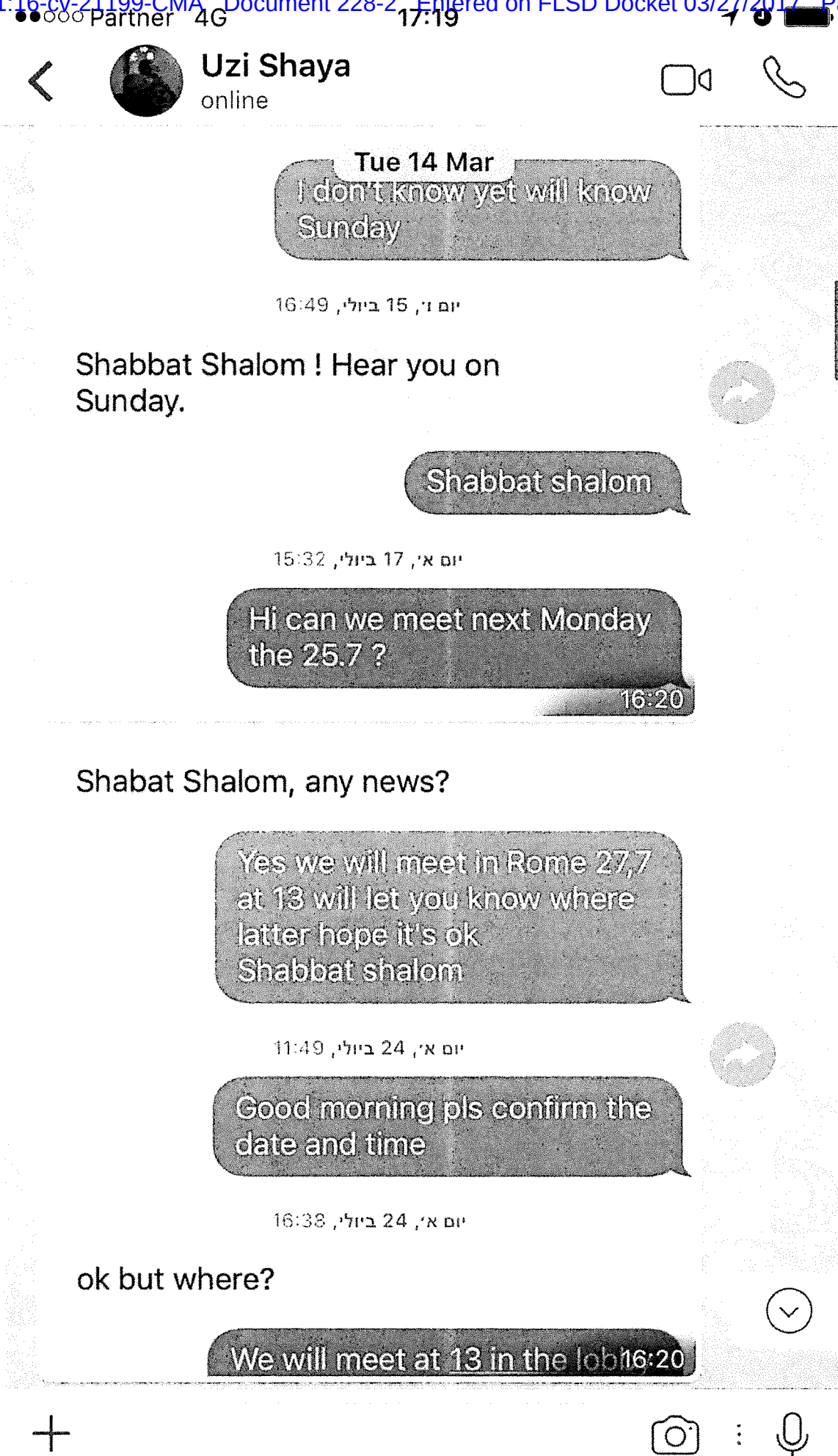
Hello any news? Shabat Shalom!

יום ו', 28 באוק, 18:18

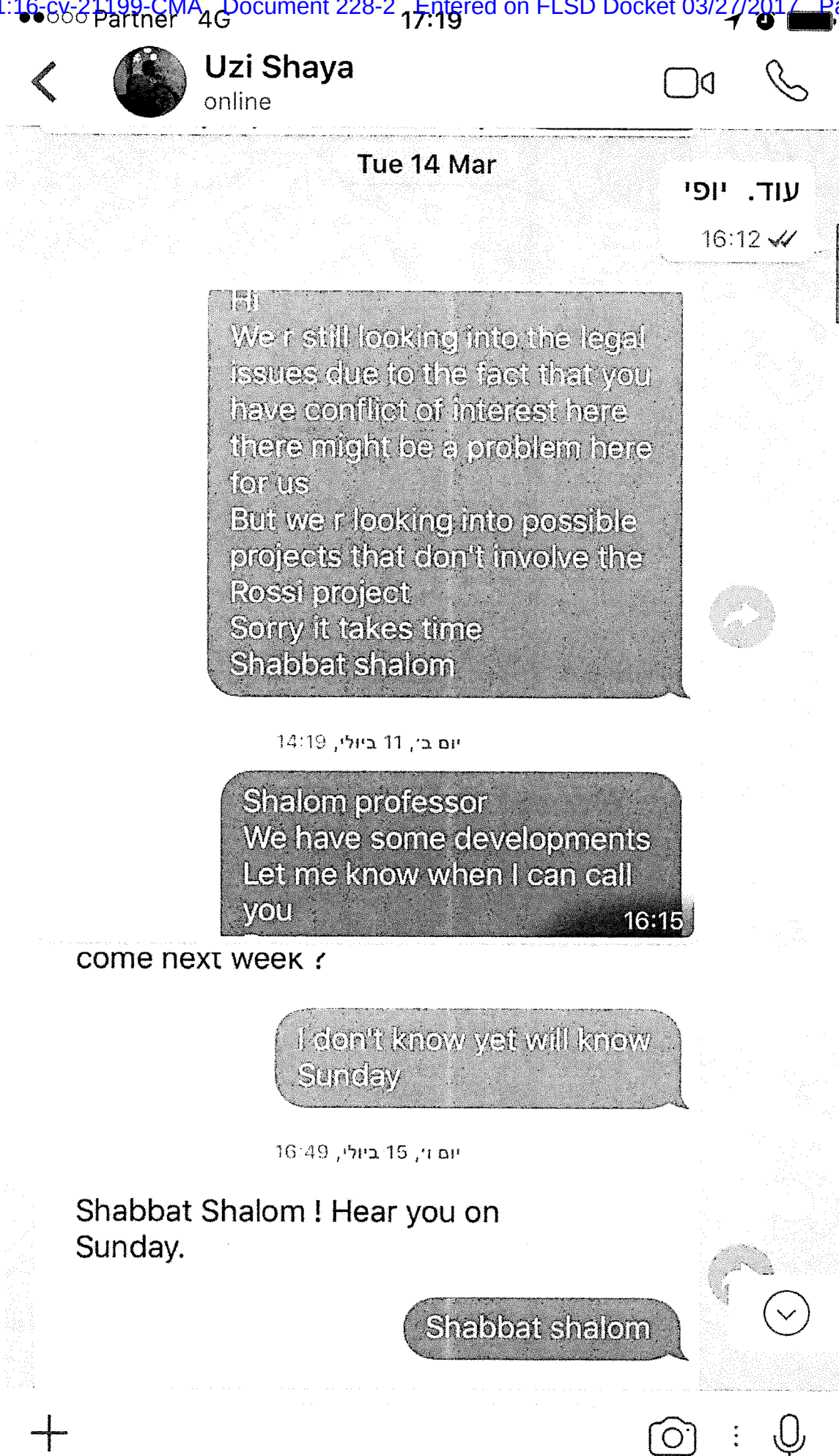
Yes most probably will be in Rome this coming Wednesday Shabbat shalom

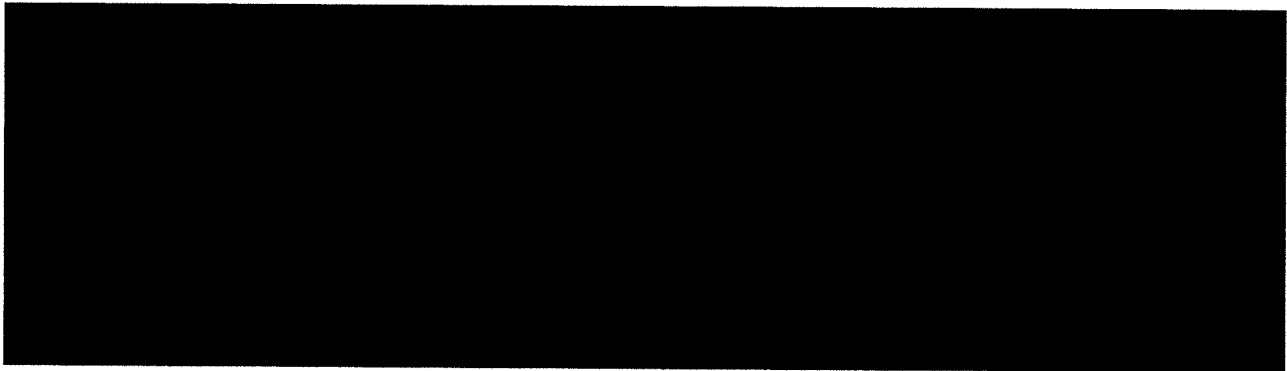
16:21











From: טוֹזִי שְׂטִיָּה <uzisha@walla.co.il<mailto:uzisha@walla.co.il>>  
Date: Tuesday, 14 March 2017 at 16:32  
To: Jaffe Fund <zalli@jfg.co.il<mailto:zalli@jfg.co.il>>  
Subject: FWD: RE: Shabat Shalom.Any news ? Any NDA ?

נשלח מאפליקציית וואלה! דואר

<uzisha@walla.co.il<mailto:uzisha@walla.co.il>>  
א: Giuseppe Levi <giuseppe.levi@gmail.com<mailto:giuseppe.levi@gmail.com>>,  
עותק:  
תאריך: 1/6/2016  
כותרת: RE: Shabat Shalom.Any news ? Any NDA ?  
Yes will be in touch next week  
Shabbat shalom  
Uzi

17:35 2016 , ב יולי 1, Giuseppe Levi כתב:  
Hi, Shabat Shalom,  
we met more then two weeks ago at Rav. Borenstein home in Bologna.  
Any news ? Any NDA ?  
Giuseppe Levi

(And yes here is my phone number:)

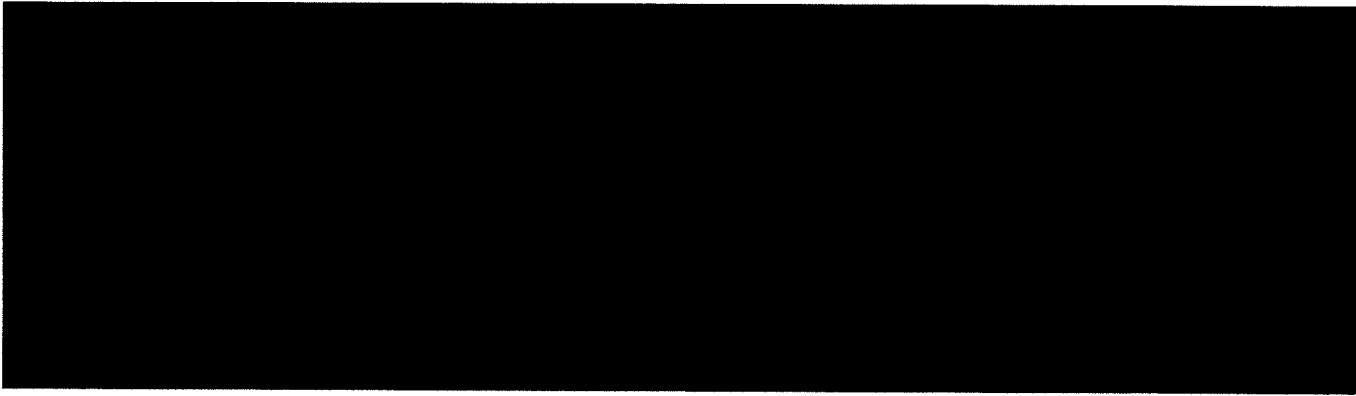
--  
Dr. Giuseppe Levi  
Physics Dpt and INFN  
viale Bertini Pichat 6/2  
40127 BOLOGNA  
Mobile: +39 393 0086704



From: טוֹזִי שְׁעִיָּה <uzisha@walla.co.il<mailto:uzisha@walla.co.il>>  
Date: Tuesday, 21 March 2017 at 16:21  
To: Jaffe Fund <zalli@jfg.co.il<mailto:zalli@jfg.co.il>>  
Subject: FWD: Shabat Shalom.Any news ? Any NDA ?

נשלח מאפליקציית וואלה! דואר





From: מוֹזִי שְׁעִיָּה <uzisha@walla.co.il<mailto:uzisha@walla.co.il>>  
Date: Tuesday, 21 March 2017 at 16:37  
To: Jaffe Fund <zalli@jfg.co.il<mailto:zalli@jfg.co.il>>  
Subject: RE: Re: A draft list of names.....

Dear Uzi, ShavuaTov,  
as I have told you probably one good solution for you and your investors is to have a group of consultants instead of one.  
In the LENR field because of the high economical interest many researchers are connected in some way to companies, or has submitted patent applications and is quite difficult to find a single person that is expert of the field AND completely neutral.  
Here are some names:  
First of all the Nobel Laureate  
Brian Josephson <bdj10@cam.ac.uk<mailto:bdj10@cam.ac.uk>>  
He is a very clever and nice person, and I have been in contact with him up to 2013.

Also I can recommend to you my Swedish colleague  
Bo Hoistad, bo.hoistad@physics.uu.se<mailto:bo.hoistad@physics.uu.se> but be informed that he is in strict contact with Volvo (trucks) and others trying to replicate LENR reactions in Uppsala.

Also from MIT:  
Peter L. Hagelstein, I have not been in contact with him directly but we all appreciate his work in our group.

Alexander Parkhomov (Moscow) alexparh@mail.ru<mailto:alexparh@mail.ru> Which was the first to replicate the Lugano reactor ( I have met him personally ).

Vittorio Violante (Enea, Italy) who is a very fine experimentalist. I have met him on Skype.  
Note that he is probably already in contact with some industrial group (even one in Israel as far as I know).

This are just few names in the field. I think we can start from those names to form a group of experts in which each one could be biased in some way but have the TOTAL sum of bias very near zero.  
I would be glad if I can help you in any way.  
No problem.

I will try to phone you this week.

Giuseppe.

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Dr. Giuseppe Levi  
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