

# **EXHIBIT 15**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 1:16-cv-21199-CMA/O'Sullivan

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. )

C O N F I D E N T I A L

Video Deposition of THOMAS BARKER DAMERON, III  
(Taken by the Plaintiffs)  
Raleigh, North Carolina  
Thursday, December 1, 2016

Reported by: Marisa Munoz-Vourakis -  
RMR, CRR and Notary Public

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| <p>1 Q. Sir, looking at Exhibit 12, Mr. Penon<br/>                 2 submitted a report that the operation of the plant had<br/>                 3 begun, and that report was as of -- that was the first<br/>                 4 report on May 28, 2015.<br/>                 5 A. Okay. Got you.<br/>                 6 Q. Did you review that report?<br/>                 7 A. I did see that report, yes.<br/>                 8 Q. In writing to any person.<br/>                 9 Did you tell them that you thought that the<br/>                 10 results of that report were incorrect?<br/>                 11 A. Not that I recall.<br/>                 12 Q. Did you see any other reports from Engineer<br/>                 13 Penon regarding the operation of the E-CAT plant in<br/>                 14 Doral, Florida, between February 2015 and February<br/>                 15 2016?<br/>                 16 A. My recollection is I saw this report. I<br/>                 17 may have seen another report sometime between this<br/>                 18 report and the end of the test, but I think I've seen<br/>                 19 one at the end of the test.<br/>                 20 Q. And with those reports, did you ever send<br/>                 21 an email to anybody, whether it be Engineer Penon,<br/>                 22 Dr. Rossi, Mr. Vaughn, Mr. Darden, indicating that you<br/>                 23 disagreed with those reports?<br/>                 24 A. Not that I recall.<br/>                 25 Q. Sir, did you ever prepare a design</p> | <p>1 was not there, and I have heard from Barry West it was<br/>                 2 rearranged, consciously rearranged.<br/>                 3 Q. What do you mean by consciously rearranged?<br/>                 4 A. Andrea changed the design -- layout of it<br/>                 5 and put it in a different way.<br/>                 6 Q. And what was the difference?<br/>                 7 A. It didn't have a steam header in it. It<br/>                 8 didn't have the steam traps in it. It didn't have the<br/>                 9 drains in it.<br/>                 10 MR. ANNESSER: Sorry, gentlemen, I<br/>                 11 can't hear. Gentlemen, please.<br/>                 12 Q. So you said it did not have a steam header,<br/>                 13 correct?<br/>                 14 A. Did not have --<br/>                 15 Q. I want to go through these again. I want<br/>                 16 to go through one by one to make sure I understand.<br/>                 17 A. The steam header that was made to go on the<br/>                 18 unit was not on the unit.<br/>                 19 Q. What is the steam header?<br/>                 20 A. Steam header is a piece of pipe that comes<br/>                 21 out, has taps in it for pressure and temperature,<br/>                 22 thermal wells for temperature. It had a place to<br/>                 23 put -- it had a drip leg in it where you could get<br/>                 24 condensate out, a place for a trap to drain that. It<br/>                 25 had a place to install two steam meters. It had a way</p> |
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| <p>1 schematic for the layout of the plant and how it should<br/>                 2 be at the Doral facility, in your opinion?<br/>                 3 A. Yes.<br/>                 4 Q. Did you ever share that with Dr. Rossi?<br/>                 5 A. I thought that I did. I don't guarantee<br/>                 6 it.<br/>                 7 Q. If it's not in the emails that are<br/>                 8 produced, is it fair to state that it was not shared<br/>                 9 with Dr. Rossi?<br/>                 10 A. No, because it may have been shown to him<br/>                 11 in a hand sketch.<br/>                 12 Q. When would you have shown that to him?<br/>                 13 MR. PACE: Objection to the form of<br/>                 14 the question.<br/>                 15 A. That would be very near the time it was<br/>                 16 shipped, as that would have been when that was being<br/>                 17 laid out.<br/>                 18 Q. Isn't it true, sir, that Dr. Rossi was in<br/>                 19 fact in Miami prior to it being shipped?<br/>                 20 A. He was back and forth at various times.<br/>                 21 Q. Do you know whether the layout of the plant<br/>                 22 was done in line with your design schematic?<br/>                 23 A. I think it was not.<br/>                 24 Q. How so?<br/>                 25 A. When I went down there and looked at it, it</p>   | <p>1 to connect it back together again and connect to the<br/>                 2 pipe going to the JM Products.<br/>                 3 Q. And, sir, what was there in place of this<br/>                 4 steam header?<br/>                 5 A. A line came out of the one megawatt unit<br/>                 6 and turned and went straight to the JM Products.<br/>                 7 Q. Were there any temperature devices there,<br/>                 8 temperature gauges?<br/>                 9 A. I don't -- there may be, I don't recall.<br/>                 10 Q. Pressure gauges?<br/>                 11 A. I don't think there were any pressure<br/>                 12 gauges there. There was a pressure gauge inside the<br/>                 13 unit.<br/>                 14 Q. And when you were there on February 24,<br/>                 15 2015, did you pull Andrea Rossi aside and say hey, this<br/>                 16 isn't what we planned?<br/>                 17 A. No, I did not.<br/>                 18 Q. When you returned, did you tell Mr. Vaughn<br/>                 19 or Mr. Darden that --<br/>                 20 A. Most likely, yes.<br/>                 21 Q. Did you ever tell Mr. Penon?<br/>                 22 A. No.<br/>                 23 Q. And you don't know sitting here today<br/>                 24 whether Mr. Darden or Mr. Vaughn ever told Dr. Rossi or<br/>                 25 Engineer Penon --</p>  |

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