

**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.

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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., et al.,

Third-Party Defendants.

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**SUPPLEMENT TO JOINT PRETRIAL STIPULATION**

**PLAINTIFFS EXHIBITS:**

Plaintiffs, Andrea Rossi and Leonardo Corporation (collectively "Plaintiffs"), hereby file their Exhibit List.

PLTS' EXH.#	DOC DATE	DESCRIPTION	BATES #	DEPO EXH./ PAGE	Expect (E) or May (M)	Objection
1.	9/12/2014	Amended and Restated Assignment and Assumption of License Agreement between Industrial Heat, LLC and IPH International B.V.	IH-00002266 - IH-00002315 IH-00046838 - IH-00046845	99334	M	
2.	2/1/2017	Fourth Amended Answer, Additional Defenses, Counterclaims and Third Party Claims	DE - 132		M	
3.	4/5/2016	Plaintiffs' Complaint	DE - 1		M	
4.	9/4/2014	July 2014 PPM attached - with attached Confidential Memorandum regarding Industrial Heat, LLC, IPH International B.V. - July, 2014	IH-00107598 - IH-00107777		M	R I UP
5.	12/31/2014	IPH International B.V. Financial Report - KvK: 57824053	IH-00022241 - IH-00022249		M	R I UP
6.	2/5/2016	Amended and Restated Services Agreement between Industrial Heat, LLC and IPH International B.V.	IH-00047272 - IH-00047279		E	
7.	8/13/2014	Term Sheet between Industrial Heat, LLC, JM Chemical Products, Inc. and Leonardo Corporation	EX 17 - DE 132 EX 17 - DE 78 IH-00011496 - IH-00011497		M	
8.	6/29/2012	CHEROKEE License Agreement - Draft	IH-00010493		E	H  IH-00010493 does not contain the referenced document
9.	10/6/2012	Andrea Rossi - meeting in Ft. Lauderdale on the open issues in the document	IH-00021271		M	
10.	8/23/2012	R: Call	IH-00010924 - IH-00010925		M	
11.	10/24/2012	Competing IP language and schedule discussion	IH-00084295 - IH-00084297		M	H
12.	10/26/2012	License Agreement between Leonardo Corporation, Andrea Rossi, Ampenergo, Inc. and Industrial Heat, LLC	B - Cmp - DE 1 Rossi - 000440 - Rossi - 000464 IH-00044199 - IH-00044232		E	
13.	4/29/2013	First Amendment to License Agreement between Leonardo Corporation, Andrea Rossi, AmPenergo, Inc. and Industrial Heat, LLC	C - Cmp - DE 1 Rossi - 002388 -		E	

			Rossi – 002391 IH-00044249 – IH-00044253 IH-00044927 – IH-00044932			
14.	4/29/2013	Assignment and Assumption of License Agreement	EX 7 - DE 132 IH-00044254 – IH-00044255 IH-00045412 – IH-00045413		E	
15.	4/29/2013	Andrea Rossi and Leonoardo Corporations's Certificate of representations and warranties contained iun the License Agreement between Leoniardo, Rossi, Industrial Heat and AmpEnerg, Inc. dated 10/26/2012	EX 8 - DE 132		M	
16.		Second Amendment to License Agreement between Leonardo Corporation, Andrea Rossi, Ampenergo, Inc.and Industrial Heat, LLC	D - Cmp - DE 1 Rossi - 00478 - Rossi - 00480		E	
17.		Re: 6 Cylinder Unit		ROSSI - 12, P. 172	M	
18.	6/10/2014	Andrea Rossi - SITUATION	IH - 00012026		M	H
19.	6/23/2014	Meeting of June 17th	IH - 0011150 - IH - 00011151		M	
20.		Photo of the warehouse in Doral, 7641 46th Street		ROSSI - 15, P. 26 Stokes - 10, P. 71	M	ROSSI – 15, P. 26 does not contain the referenced document
21.	09/00/2015	Andrea Rossi notes regarding 1MW Plan Performance Updates	EX 4 - DE 132		M	H
22.	7/1/2015	Amount of energy received from IH's plant	EX 18 - DE 132		M	H
23.	8/1/2015	Amount of energy received from IH's plant	EX 18 - DE 132		M	H
24.	9/8/2015	Amount of energy received from IH's plant	EX 18 - DE 132		M	H
25.	10/12/2015	Amount of energy received from IH's plant	EX 18 - DE 132		M	H
26.	1/4/2016	Amount of energy received from IH's plant	EX 18 - DE 132		M	H
27.		Photo of the Four Frankies as they existed inside the container that was in Doral, Florida		ROSSI - 22, P286 Stokes - 12, P. 75	M	

28.		Photograph of the inside columns are where the individual E-Cat units were located		ROSSI - 23, P. 287	M	
29.	7/15/2013	Industrial Heat	IH-00082315 - IH-00082329		M	R H UP
30.	8/16/2012	Analysis	IH-00083129 - IH-00083130		M	R
31.	7/16/2012	High Temperature E-CAT Module Test	IH-00083132 - IH-00083149		M	H
32.	8/7/2012	High Temperature Energy Catalyzer Test	IH-00083131		M	H
33.	1/5/2015	Management Team Structure	IH-00127754 - IH-00127759		M	R H
34.		Corporate Structure of IH Holdings International Limited	IH-00113114		M	R
35.	7/13/2012	Test Criteria	IH-00083307		M	R H
36.	9/6/2012	Draft document including edits	IH-00117875 - IH-00117876		M	
37.		Industrial Heat Company Information Manual - Business Plan	IH-00108659 - IH-00108661		M	
38.	02/00/2013	Industrial Heat, LLC February, 2013 Manual	IH-00136414 - IH-00136430		M	R UP
39.	4/25/2013	E-Cat Validation Protocol	IH-00083046 - IH-00083048		M	
40.	4/15/2013	DRV Comments on "Test Protocol for Plant Made for Cherokee"	IH-00058504 - IH-00058506		M	R H
41.	5/10/2016	Test Process	IH-00099334 - IH-00099336		M	H
42.	4/19/201	Andrea Rossi	IH-00020906 - IH-00020911		M	H
43.	7/16/2013	Industrial Heat Investor Update: July 2013	IH-00096250 - IH-00096252		E	
44.	7/16/2013	Industrial Heat - Sources of capital report - Financial Breakdown - spreadsheet	IH-00022072 - IH-00022074		M	R UP
45.	9/7/2014	Draft TD email to Paul at WIM	IH-00081230 - IH-00081234		E	H
46.	2/24/2016	Draft Opinion of Fair Market Value of a 100% Equity Interest IH Holdings International Limited December 21, 2015	IH-00022156 - IH-00022200		E	H R
47.	00/00/2015	The Feasibility report of Cold Fusion (E-CAT) of Industrialization in China		IH - 24, P. 182	M	A R
48.	8/19/2013	Induswtral Heat Update	IH-00089208 - IH-00089212		M	H R
49.	7/18/2013	Re: Andrea	IH-00004856 - IH-00004857		M	H
50.	1/24/2014	Interim Progress Report Regarding the Patentability of Rossi's Energy Catalyzer with attachment	IH-00045757 - IH-00045819		M	P

51.	9/11/2014	IH Timeline - please help fill in / edit as necessary	IH-00107550 - IH-00107552		E	
52.	9/29/2014	Industrial Heat Update 5/7/14 - CONFIDENTIAL	IH-00107246 - IH-00107247		M	R
53.	0/0/0000	Industrial Heat IPH International, B.V. 18 Month Business Plan	IH-00106452 - IH-00106474		E	R UP
54.	8/9/2013	Andrea Rossi	IH-00010037 - IH-00010038		M	H
55.	6/14/2014	Applicability of Ionizing Radiation Protection Regulations to Rossi E-Cat Device	IH-00003735		M	H R
56.	6/22/2014	Pls offer thoughts about this message as a quick holding reply	IH-00117296 - IH-00117297		M	H
57.	7/30/2014	Andrea Rossi	IH-00011865 - IH-00011866		M	H
58.	7/30/2014	Andrea Rossi	IH-00011867 - IH-00011870		E	H
59.	6/10/2014	Andrea Rossi	IH-00012026		E	
60.	3/23/2015	Introduction	IH-00080561 - IH-00080567		E	H
61.	1/3/2017	Supplement to Defendant Industrial Heat, LLC's Amended Responses and Objections to Plaintiff Andrea Rossi's First Set of Interrogatories			M	R
62.	9/1/2013	Technical Consulting Agreement	Ex 11 to Second Amended Answer and Additional Defenses, Counterclaims and Third Party Claims		M	
63.	10/18/2013	re: Fulvio Fabiani	IH-00003717 - IH-00003718		M	R
64.	00/00/0000	Photograph of Andrea Rossi with E-Cat		Stokes - 1, P. 21	M	R
65.	2/21/2012	Concerned Citizen Report		Stokes - 2, P. 21	M	R
66.	10/20/2015	Dr. Rossi Investigation		Stokes - 3, P. 26	M	R H
67.	00/00/0000	Andrea Rossi handwritten notes February 23 - 28	Rossi-00009285 Rossi-00009297		M	R H
68.		View of the inside of the E-Cat plant		Leo - 4, P. 73	M	R
69.		View of the inside of the E-Cat plant		Leo - 5, P. 73	M	R
70.	2/1/2015	Chart/Report that appears to reflect different events relating to the E-Cat plant		Leo - 6, P. 125	M	R A

71.	00/00/2015	Leonardo Corporation invoices provided to IH or IPH by Leonardo Corporation for reimbursement of expenses	IH-00016777 IH-00016937 IH-00017314 IH-00018819 IH-00019062		M	R H
72.	2/10/2015	Test Plan with attached E-CAT MW1 Energy Plant in Miami Tests Plan - Test Plan	IH-00007019 - IH-00007023 IH-00104655 - IH-00104658		E	R H
73.	2/20/2015	Test Plans	IH-00019103 - IH-00019108		E	R H
74.		Photo showing the condensed steam		Leo - 10, P. 181	M	R
75.		Photo showing the condensed steam		Leo - 11, P. 181	M	R
76.	11/4/2015	Strictly confidential Memorandum - Industrial Heat Update, 24 September - 30 Octoberm 2015	IH-00126548 - IH-00126558		M	R
77.	7/30/2012	Reminder: Dr. Andrea Rossi, Cold Fusion briefing along with Ampenergo at Mon July 30 9:30 a.m. - 5:00 p.m.	IH-00083184 - IH-00083186		M	R
78.	9/26/2012	FYI e-mail from Rossi	IH-00084443 - IH-00084444		M	R H
79.	10/4/2012	NASA powerpoint on Rossi and the Ecat - released by FOIA	IH-00084412		M	R
80.	10/24/2012	Agreements	IH-00111925 - IH-000111926		M	R
81.	8/2/2016	Defendants' Initial Disclosures		MAZZ - 7, P. 121	M	I
82.	11/2/2012	Communication with Rossi	IH-00111707 - IH-00111708		M	R
83.	11/13/2012	Rossi	IH-00111544		M	R
84.	2/20/2013	Teaser: tracked changes	IH-00083909 - IH-00083916		M	R
85.	7/4/2014	Andrea	IH-00090966 - IH-00090967		M	R H
86.	1/16/2015	IP, patents	IH-00117047 - IH-00117052		M	R H
87.	7/14/2014	IH PPM DRAFT updated 7.14.14 to included Exec Summary with attachment	IH-00090771 - IH-00090797		M	R
88.	10/31/2014	Industrial Heat	IH-00131643 - IH-0031644		M	R P
89.	0/0/0000	Initial Due Diligence Review Form (attachment to the Paul Lamacraft e-mail)		MAZZ - 18, P. 233	M	R
90.	0/0/0000	Photograph showing the inside of the Doral warehouse with a pipe wrapped in insulation that has since been removed		JMP - 4, P. 82	M	

91.	6/27/2014	Written Action of Subscriber, First Board of Directors and Stockholders of J.M. Chemical Products, Inc.	JM-000014 JM-000016		M	
92.	3/22/2015	Order for 10 kg of platinum sponge	Rossi-00003876		M	H
93.		Photo of the Doral warehouse taken from the Leonardo side of the warehouse - taken after the closing of the plants.		JMP - 8, P. 114	M	R
94.	2/13/2017	Photographs of piping, warehouse, etc. - part of Composite Exhibit A to Dr. Wong's Expert Report		JMP - 14, P. 134	M	A
95.		Compliance with OFAC	Rossi-000464 IH-00004341		M	
96.	5/23/2016	Andrea	JB-000468		M	R H
97.	6/17/2016	Invoice for parts	JB-000473		M	R
98.		Sale Contract between J.M. Products and REDACTED	JM-000062 - JM -000064		M	
99.	4/30/2014	Andrea Rossi	IH-00091696 - IH-00091697		M	R H
100.	0/0/0000	Excerpt of Andrea Rossi blogs - page 2 of 59	Ex. 25 - DE 132		M	
101.	2/3/2014	Photograph of Super Q-cat		Stokes - 4, P. 31-32	M	R A
102.	2/12/2016	Fred Zoepfl, Ph. D.		Stokes - 6, P. 51	M	R H
103.	2/10/2016	Who is "The Customer"		Stokes - 8, P. 63	M	R H
104.	2/5/2013	DRV-IIH slides - Close to final	IH-00057735		M	R H
105.	2/5/2013	Deep River Ventures Investor Slides Industrial Heat	IH-00057736 - IH-00057742		M	R H
106.	8/21/2012	Feldman ping - FW: Rossi - LENR Device / NC anytime soon?	IH-00084656 - IH-00084657		M	R H
107.	7/11/2012	Re: Dr. Rossi - Low Temp / Pressure Fusion Inquiry	IH-00083348 - IH-00083349		M	R H
108.	6/14/2012	Re: Meeting with Dr. Rossi on the 22nd at 3 p.m. in Miami	IH-00083467 - IH-00083469		M	R H
109.	1/28/2013	LENR IP Sector Investigation, Analysis and Planning Proposal	IH-00028202 - IH-00028203		M	R H
110.	12/00/2015	Industrial Heat Confidential Overview - IH Holdings International Ltd.	IH-00087553 - IH-00087582		M	R H
111.	11/5/2015	United States of America Before the Securities and Exchange Commission - ORDER INSTITUTING CEASE AND DESIST PROCEEDINGS PURSUANT TO SECTION 203(k) OF THE INVESTMENT ADVISERS ACT OF 1940, MAKING FINDINGS AND IMPOSING A CEASE AND DESIST ORDER		Weaver - 8, P. 53	M	R H
112.	2/16/2013	Re: EPO - 2 month Extension + Rossi	IH-00057793 -		M	H

		Contract / IP	IH-00057794			
113.	5/20/2015	Consulting Confidentiality Noncompetition and Inventions Agreement between Industrial Heat, LLC and Deep River Ventures, LLC		Weaver - 10, P. 58	M	R H
114.	2/23/2013	IH Phone Call	IH-00057923		M	R H
115.	10/27/2013	RE: Thoughts on Darden (Incorrect) Perspective on Cash	IH-00060586 - IH-00060589		M	R H UP
116.	12/15/2014	Re: Management Team Structure	IH-00137932 - IH-00137839		M	R H
117.	0/0/0000	Draft Industrial Heat IP Roll-Up, Protection and Exploitation Model	IH-00062866		M	R H
118.	0/0/0000	Industrial Heat Intellectual Property Plan	IH-00058301 - IH-00058302		M	R H
119.	1/5/2015	David French wonders what is going on with IH and Rossi	IH-00064641 - IH-00064642		M	R H P
120.	8/12/2013	Andrea blogging	IH-00060116 - IH-00060122		M	R H
121.	6/12/2016	IH Contact	IH-00112779		M	R H
122.	10/9/2014	Data Wrangling	IH-00063618 - IH-00063620		M	R H
123.	0/0/0000	Letts - Suggstions for Reaction Enhancement / Sustainance - catalyst	IH-00054268 - IH-00054279		M	R H
124.	7/26/2014	Letts Frwd Predicted Rossi July 2014 Test	IH-00063019 - IH-00063020		M	R H
125.	9/17/2014	Letts Frwd Simple but revealing E-Cat Tests	IH-00063340 - IH-00063341		M	R H
126.	10/10/2014	Dual ecat Flow Calorimeter	IH-00054257		M	H
127.	10/10/2014	AM Phone Meet	IH-00063701 - IH-00063704		M	R H P
128.	2/19/2013	Quiet Inquiry - Rossi Thermoelectric US Patent / Trade Secret Risk	IH-00128325 - IH-00128327		M	H
129.	3/3/2013	What does IH actually get from Rossi?	IH-00057969 - IH-00057970		M	R H
130.	5/27/2016	Data	IH-00076794		M	R H
131.	4/24/2014	Is there no news from Rossi?	IH-00062589 - IH-00062590		M	R H
132.	12/2/2013	Interesting Data	IH-00060748 - IH-00060749		E	
133.	7/22/2015	ECAT Heat Energy - News from Andrea Rossi / Ecat.com	IH-00068191 - IH-00068194		M	H
134.	4/1/2013	3 Phoenix Intro Meeting - Wed 1:30 PM	IH-00058175 - IH-00058177		M	
135.	11/1/2015	Re: Comprehensive List of Rossi / Parkhomov	IH-00070376 -		M	H



		Replication Efforts	IH-00070377			
136.	9/1/2016	Lugano COP revisited	IH-00079368 - IH-00079370		M	H
137.	4/9/2016	Amicus Curiae Brief?	IH-00073460 - IH-00073461		M	H
138.	4/8/2016	Greetings!	IH-00073437 - IH-00073450		M	R H
139.	1/14/2014	Rossi may need a power analyzer	IH-00061246		M	
140.	2/19/2016	Industrial Heat of RTP, North Carolina	IH-00072057 - IH-00072064		M	
141.	4/15/2013	Test Criteria Input	IH-00058523		M	
142.	1/13/2015	IP, patents	IH-00114237 - IH-00114242		M	H
143.	4/28/2016	CMNS Dewey Weaver and inside information on the Rossi affair	IH-00075534 - IH-00075550		M	R H
144.	8/6/2015	R Explaining use of 250k W Tigers / original E-Cats for 350 day test	IH-00088876		M	
145.	7/30/2014	1MW Performance Expectations on JONP	IH-00089989		M	
146.	2/1/2016	JNOP 400 day test of 1MW unit is for customer of IH - MW1	IH-00100524		M	
147.	5/22/2016	Blogging communications Dewey Weaver and Andrea Rossi to Rigel		Weaver - 44, P. 207	M	R H
148.	6/10/2016	LENR		Weaver - 45, P. 213	M	R H
149.	5/20/2016	Blogging communications Dewey Weaver, Eric Walker, Stefan		Weaver - 46, P. 214	M	R H
150.	5/22/2016	Blogging communications Dewey Weaver, Oystla		Weaver - 47, P. 217	M	R H
151.	1/27/2014	A fallback plan - test a unit from the 1 MW reactor	IH-00061311		M	
152.	1/13/2014	Rossi may need a power analyzer	IH-00113639 - IH-00113649		M	
153.	3/29/2016	Energy Multiple Final Report	IH-00079629 - IH-00079658		E	
154.	4/8/2016	I am writing a critique of Penon	IH-00073357 - IH-00073360  IH-00132451		M	
155.	4/13/2016	My latest message to Mats	IH-00073740 - IH-00073741		M	
156.	6/8/2016	Check the water for antifreeze	IH-00076938		M	
157.	4/20/2016	Confidential	IH-00074035		M	
158.	6/17/2016	Address for base Lugano Reactor / Observation from test	IH-00115920 - IH-00115925		M	

159.	2/17/2017	Strange e-mail		Weaver - 56, P. 247	M	
160.	5/20/2013	F Fab Curriculum	IH-00020852 - IH-00020856		M	
161.	2/27/2015	Problem MW 1 con sonde K	IH-00019367 - IH-00019371		M	
162.	3/6/2015	Files	JB000082		M	
163.	4/13/2015	Status	JB000076 - JB000077		M	
164.	5/13/2015	Status	JB000068 - JB000069		M	
165.	6/19/2015	Foto	Rossi_00001276 Rossi_00001279		M	
166.	7/7/2015	Contract Renew - with Technical Consulting Agreement between US Quantum Leap LLC and IH	IH-00017713 - IH-00017721		M	
167.	2/23/2016	Ecat Final Documentation	IH-00016114		M	
168.	2/13/2017	Expert Disclosure of Prof. Dr Kau-Fui V. Wong		Wong - 1, P. 39 Wong - 3, P. 61	M	
169.	3/28/2016	E-CAT MW1 Energy Plant in Miami - Energy Multiple Evaluation Final Report of Dr. Ing Fabio Penon with attachments	PENON0000180 PENON0000208 IH-00079638 - IH-00079642		M	
170.	2/11/2017	OPPO Conducibita Termica		Wong - 10, P. 185	M	
171.	2/8/2017	Mutual Non-Disclosure agreement between Leonardo Corporation and Dr. Kau-Fui V. Wong		Wong - 12, P. 190	M	
172.	9/23/2013	Industrial Heat update 9/24/13	IH-00124716 - IH-00124720		M	
173.	10/19/2014	Pomp of Upsala appears to be the led skeptic on this one	IH-00106331 - IH-00106333		M	
174.	9/26/2013	Contract amendment	IH-00094574 - IH-00094575		M	
175.	10/22/2013	6 cylinder - why not just build a one cylinder unit	IH-000133919		M	A/I/R/H/U P*** <sup>12</sup>
176.	10/24/2013	Testing of LENR	IH-00130814 - IH-00130815		M	A/I/R/H/U P***

<sup>1</sup> \*\*\* Plaintiffs agree that Defendants did not have adequate time to review and note their objections to Plaintiffs' exhibit list, as it was served today. Defendants preserve all objections, and the right to move to strike, as to those exhibits that they were not afforded a fair and reasonable opportunity to review for objections.

177.	11/18/2013	Draft Report	IH-00124621 - IH-00124625		M	A/I/R/H/U P***
178.	12/2/2013	Interesting Data	IH-00130817 - IH-00130818		E	A/I/R/H/U P***
179.	12/12/2014	Management Team Structure	IH-00127820 - IH-00127825		M	A/I/R/H/U P***
180.	11/16/2015	Tests plan	IH-00116807 - IH-00116810		E	A/I/R/H/U P***
181.	2/25/2016	United States Patent Application Publication - Pub No. US 2016/0051957 A1		Vaughn - 19, P. 249 Damero n - 17, P.	E	A/I/R/H/U P***
182.	0/0/0000	Photograph of red container inside Doral warehouse		Stokes - 11, P. 74	M	A/I/R/H/U P***
183.	0/0/0000	Photograph of Dr. Rossi and 2 other individuals		Stokes - 19, P. 87	M	A/I/R/H/U P***
184.	0/0/0000	Photograph of a gentleman in a blue car		Stokes - 20, P. 98	M	A/I/R/H/U P***
185.	0/0/0000	Photograph of the corner of the office trailer at the Doral warehouse		Stokes - 21, P. 110	M	A/I/R/H/U P***
186.	10/19/2015	E-CAT MW1 ENERGY PLANT IN MIAMI ENERGY MULTIPLE VALUATION: SECOND STEP	IH-00006742 - IH-00006743		E	A/I/R/H/U P***
187.	10/19/2015	E-Cata MW1 Energy Plant In Miami Energy Multiple Valuation - Second Step with attached MW1 USA Electrical Measurement in reactors BF1, BF2, BF3 dated 10/13/15 and 10/14/15, hand written notes and Confidential Agreement between IH and Barry West dated 9/26/2013		West - 2, P.	E	A/I/R/H/U P***
188.	10/13/2015	MW1 USA Electrical Measurement in reactors BF1, BF2, BF3		West - 4, P.	M	A/I/R/H/U P***
189.	10/14/2015	MW1 USA Electrical Measurement in reactors BF1, BF2, BF3		West - 5, P.	M	A/I/R/H/U P***
190.	3/28/2016	E-CAT MW1 Energy Plant in Miami - Energy Multiple Evaluation Final Report of Dr. Ing Fabio Penon	IH-00006670 - IH-00006674		E	A/I/R/H/U P***
191.	6/1/2015	Consulting Confidentiality Noncompetition and Inventions Agreement between Industrial Heat, LLC and Joseph A. Murray	IH-00132010 - IH-00132020		M	A/I/R/H/U P***
192.	01/00/2016	Industrial Heat - Introduction	IH-00053931 - IH-00053943		M	A/I/R/H/U P***
193.	12/1/2015	Plant Status	IH-00087704		M	A/I/R/H/U P***
194.	4/25/2016	Follow up	IH-00087145 - IH-00087148		M	A/I/R/H/U P***

195.	7/13/2015	Andrea Rossi	IH-00088952 - IH-00088953		M	A/I/R/H/U P***
196.	7/18/2015	Summary of the Swansboro Meeting	IH-00120182 - IH-00120185		E	A/I/R/H/U P***
197.	2/25/2016	Industrial Heat - Appendix - Assessment of the Doral Florida Plant of Leonardo, Inc. - Document Number 20160219-001	IH-00120031 - IH-00120069		E	A/I/R/H/U P***
198.	2/23/2016	E-Cat reports with attached E-Cat MW1 Energy Plant in Miami Plant - Start Up	IH-00011095 - IH-00011132		E	A/I/R/H/U P***
199.	3/29/2016	From Rossi's e-mail list - report fyi	IH-00087309 - IH-00087310		M	A/I/R/H/U P***
200.	7/22/2015	E-Cat Heat Energy - News from Andrea Rossi/Ecat.com	IH-00088933 - IH-00088936		M	A/I/R/H/U P***
201.	1/30/2017	Expert Disclosure of Joseph Murray		Murray - 11, P.	M	A/I/R/H/U P***
202.	8/29/2016	Subpoena to third party, FPL with FPL documents produced in response	IH_FPL-000001- IH_FPL-000053		M	A/I/R/H/U P***
203.	10/19/2016	Letter from FPL with attached documents regarding documents withheld responsive to Subpoena	IH_FPL-000054 IH_FPL-000067		M	A/I/R/H/U P***
204.	5/7/2016	Flow Meter Testing	IH-00120283 - IH-00120285		M	A/I/R/H/U P***
205.	2/29/2016	Rapporto Di Taratura - Calibration Certificate	Penon0000153 - Penon0000164		E	A/I/R/H/U P***
206.	11/20/2014	No Luck	IH-00139330 - IH-00139331		M	A/I/R/H/U P***
207.	0/0/0000	Photographs of Dummy Unit - Super Q-Cat	IH-00139332		M	A/I/R/H/U P***
208.	11/19/2014	Report - Dummy Test		Boeing - 4, P.	M	A/I/R/H/U P***
209.	11/19/2014	Report - Dummy Test - Q-TEC Dummy Comparison		Boeing - 5, P.	M	A/I/R/H/U P***
210.	4/13/2011	Proprietary Information Agreement - PIA No. 2011-2011 between The Boeing Company and Leonardo Corporation	IH-00082952 - IH-00082956		M	A/I/R/H/U P***
211.	3/13/2014	Andrea Rossi - Jet Engine	IH-00092149 - IH-00092152		M	A/I/R/H/U P***
212.	11/22/2013	IR Camera Question	BOE_000341		M	A/I/R/H/U P***
213.	12/3/2013	Industrial Heat - E-Cat HT Test Outline - Preliminary Draft Only - V1.0	IH-00093732 - IH-00093747		M	A/I/R/H/U P***
214.	12/5/2013	Preliminary Test Outline	IH-00093731		M	A/I/R/H/U P***
215.	11/21/2014	No Luck	IH-00105494 - IH-00105495		M	A/I/R/H/U P***
216.	11/21/2014	No Luck	IH-00105542 - IH-00105544		M	A/I/R/H/U P***
217.	7/15/2015	June 30 Thermocouple Data	IH-00138640		M	A/I/R/H/U P***
218.	12/10/2014	N-Star Update	Boe_001557		M	A/I/R/H/U P***

219.	1/18/2015	N-Star Update	Boe_001551 - Boe_001552		M	A/I/R/H/U P***
220.	4/24/2015	New Refuelable Reactor	IH-00139153 - IH-00139162		M	A/I/R/H/U P***
221.	12/15/2012	HYDROGEN NICKEL COLD FUSION	IH-00079300		M	A/I/R/H/U P***
222.	4/24/2013	Testing setup, version 1	IH-00079279 - IH-00079281		M	A/I/R/H/U P***
223.	4/30/2013	Preliminary COP Calculation for E-CAT tet of 30 April, 2013		Damero n - 3, P.	M	A/I/R/H/U P***
224.	4/30/2013	E-CAT MW1 ENERGY PLANT COEFFICIENT OF PERFORMANCE (COP) EVALUATION TEST	IH-00043972 - IH-00043977		E	A/I/R/H/U P***
225.	7/13/2013	Andrea Rossi	IH-00004838		M	A/I/R/H/U P***
226.	10/10/2014	Test Box Feedback	IH-00079467 - IH-00079469		M	A/I/R/H/U P***
227.	11/15/2014	Initial heat up higher than your protocol	IH-00105497 - IH-00105498		M	A/I/R/H/U P***
228.	7/2/2015	Rossi Fueling & Reactor Rod	IH-00102496		M	A/I/R/H/U P***
229.	11/15/2014	7861 NW 46th Street - Doral, FL33166 Warehouse Property off Market on LoopNet.com	IH-00079139 - IH-00079142		M	A/I/R/H/U P***
230.	6/16/2014	MW1 Certification Document	IH-00091609 - IH-00091610		M	A/I/R/H/U P***
231.	5/29/2015	REPORTS	IH-00127169 - IH-00127171		E	A/I/R/H/U P***
232.	11/16/2015	Tests Plan	IH-00006713 - IH-00006716		E	A/I/R/H/U P***
233.	11/4/2014	Travel to Miami	IH-00005473 - IH-00005474		M	A/I/R/H/U P***
234.	11/10/2015	Investor Visit	IH-00087790 - IH-00087791		M	A/I/R/H/U P***
235.	0/0/0000	Contract Payment 89		Damero n - 16, P.	M	A/I/R/H/U P***
236.	0/0/0000	Cherokee <a href="http://cherokeefund.com">http://cherokeefund.com</a> ) - John Mazzarino	Rossi - 003820 - Rossi - 003821		M	A/I/R/H/U P***
237.	7/12/2013	Industrial Heat	IH-00082332 - IH-00082349		M	A/I/R/H/U P***
238.	6/18/2012	PLEASE READ: Need to respnd to Dr. Rossi by Monday	IH-00083439 - IH-00083442		E	A/I/R/H/U P***
239.	6/25/2012	Cold Fusion	IH-00098983		M	A/I/R/H/U P***
240.	5/5/2015	An Overview of Cherokee Investment Partners	IH-00086330 - IH-00086345		M	A/I/R/H/U P***
241.	10/19/2012	Proposed terms with AmpEnergio	IH-00111968 - IH-00111970		M	A/I/R/H/U P***
242.	10/25/2012	Cherokee - Leonardo Agreement - Celebratory Dinner	IH-00111927		E	A/I/R/H/U P***

243.	6/6/2015	For your review 1/2 with attached powerpoint presentation - the Feasibility report of Cold Fusion (E-CAT) of Industrialization in China - China 2015	Rossi-00011171 Rossi-00011202		M	A/I/R/H/U P***
244.	10/23/2012	Invoice billed to Cherokee Fund from Leonardo Corporation - Fee for the exclusive commercial and manufacturing license of the Energy Catalyzer, first account as of License Agreement signed on 10/25/2012	IH-00125536		E	A/I/R/H/U P***
245.	10/26/2012	Wire instruction	IH-00084261 - IH-00084262		E	A/I/R/H/U P***
246.	1/00/2013	Industrial Heast Investment Opportunity - Replace with LENR - Manual	IH-00111198 - IH-00111206		M	A/I/R/H/U P***
247.	6/12/2015	Management Team Structure	IH-00102795 - IH-00102800		M	A/I/R/H/U P***
248.	4/5/2016	Plaintiffs' Complaint with Fouth Amended Answer and Notice of Deposition		Cherokee - 16, P.	M	A/I/R/H/U P***
249.	0/0/0000	Fabio Penon Curriculum Vitae		Penon - 1, P.	M	A/I/R/H/U P***
250.	4/19/2013	Andrea Rossi	IH-00030719 - IH-00030722	Penon - 2	M	A/I/R/H/U P***
251.	4/22/2013	Test Protocol Proposal	PENON0000012 PENON0000015		E	A/I/R/H/U P***
252.	4/22/2013	Test Protocol Proposal	PENON0000016		E	A/I/R/H/U P***
253.	4/24/2013	Test Process	PENON0000021 PENON0000043		E	A/I/R/H/U P***
254.	4/26/2013	Certificate of Calibration	PENON0000044 PENON0000048		E	A/I/R/H/U P***
255.	5/5/2013	E-CAT COP Evaluation Test	PENON0000073 PENON0000080	Penon - 8	E	A/I/R/H/U P***
256.	5/7/2013	E-CAT COP Evaluation Test	PENON0000082 PENON0000090	Penon - 9	E	A/I/R/H/U P***
257.	6/18/2013	Invoice	PENON0000123		E	A/I/R/H/U P***
258.	2/10/2015	Tests Plan	IH-00007018		E	A/I/R/H/U P***
259.	2/19/2015	Tests Plan	IH-00019121 - IH-00019125		M	A/I/R/H/U P***
260.	2/3/2015	Proposal	PENON0000209 PENON0000213		E	A/I/R/H/U P***
261.	2/10/015	Tests Plan	PENON0000214 PENON0000218		E	A/I/R/H/U P***
262.	3/16/2015	Rapporto Di Taratura - Calibration Certificate	PENON0000165 PENON0000179	Penon - 15	E	A/I/R/H/U P***
263.		Report	PENON0000277 PENON0000292		E	A/I/R/H/U P***
264.	10/13/2015	visit of the ERV	PENON0000268		M	A/I/R/H/U P***
265.	10/22/2015	Report	PENON0000269 PENON0000273		E	A/I/R/H/U P***

266.	3/29/2016	Energy Multiple Valuation from 12/1/2015 to 2/15/2016	PENON0000347 PENON0000354		E	A/I/R/H/U P***
267.	2/4/2016	E-Cat MW1	PENON0000295		E	A/I/R/H/U P***
268.	2/23/2016	E-Cat reports with attached E-Cat MW1 Energy Plant in Miami Plant - Start Up; E-Cat MW1 Energy Plant in Miami Tests Plan and E-Cat Power Diagram MW1 - USA February, 2015, E-Cat MW1 Energy Plant in Miami Energy Multiple Valuation: First Step	PENON0000296 PENON0000333		E	A/I/R/H/U P***
269.	2/29/2016	Rapporto Di Taratura - Calibration Certificate	PENON0000153 PENON0000164		E	A/I/R/H/U P***
270.	2/20/2015	Tests Plan		Penon - 25, P.	E	A/I/R/H/U P***
271.	2/1/2015	Assorbimento Elettrico 2015		Penon - 27, P.	E	A/I/R/H/U P***
272.	2/24/2017	Defendants' Objections to Plaintiffs' Notice of Taking Videotaped Deposition and Requests for Production		Smith - 2, P.	M	A/I/R/H/U P***
273.	0/0/0000	Rick Smith Hadwritten Notes regarding classes taught		Smith - 3, P.	M	A/I/R/H/U P***
274.	0/0/0000	Rick Smith Curriculum Vitae		Smith - 4, P.	M	A/I/R/H/U P***
275.	0/0/2012	National Board Bulletin Article - Safety on Trial - 75 Ton Bottle Rocket Case Study written by Rick Smith		Smith - 5, P.	M	A/I/R/H/U P***
276.	0/0/2012	National Board Bulletin Article - Winter Storm Warning - Elementary School Boiler Malfunctioned after Ice Storm - written by Rick Smith		Smith - 6, P.	M	A/I/R/H/U P***
277.	1/30/2017	Expert Report of Rick Smith, P.E.		Smith - 7, P.	M	A/I/R/H/U P***
278.	1/25/2017	Applied Thermal Engineering, Inc., Fee Schedule and Conditions		Smith - 8, P.	M	A/I/R/H/U P***
279.	0/0/0000	Thermodynamics by Kenneth Wark - Second Edition		Smith - 9, P.	M	A/I/R/H/U P***
280.	0/0/0000	Photograph of windows of Doral warehouse from outside		Smith - 10, P.	M	A/I/R/H/U P***
281.	0/0/0000	Pipe Steam Carrying Capacity		Smith - 12, P.	M	A/I/R/H/U P***
282.	04/00/2015	Power Readings and data from various individuals		Smith - 13, P.	M	A/I/R/H/U P***
283.	0/0/0000	Thermodynamics for Engineers - Second Edition written by Kaufui Vincent Wong		Smith - 14, P.	M	A/I/R/H/U P***
284.	2/13/2017	Expert Disclosure of Prof. Dr. Kaufui V. Wong		Smith - 15, P.	M	A/I/R/H/U P***
285.	2/26/2017	CD		Smith - 17, P.	M	A/I/R/H/U P***
286.	0/0/0000	2 memory sticks		Smith - 18, P.	M	A/I/R/H/U P***
287.	11/23/2016	Third Amended Answer, Additional Defenses, Counterclaims and Third Party Claims and all		Smith - 16, P.	MM	A/I/R/H/U P***



		attachments/exhibits referenced therein				
288.	2/22/2017	All documents introduced as Smith Depo Exhibit 16		Smith - 16, P.	M	A/I/R/H/U P***
289.	2/20/2013	Reports	AE000422.002		M	A/I/R/H/U P***
290.	6/25/2012	Realy good meeting	AE000538		M	A/I/R/H/U P***
291.	9/21/20012	Annotated edits to your last draft	IH-00129182		M	A/I/R/H/U P***
292.	0/0/0000	Draft Term Sheet		Ampene gro - 5, P.	M	A/I/R/H/U P***
293.	4/16//2015	Industrial Heat LLC	IH-00104053		M	A/I/R/H/U P***
294.	4/17/2015	Industrial Heat LLC	IH-00104013		M	A/I/R/H/U P***
295.	0/0/0000	Proposed Structure	AE000340		M	A/I/R/H/U P***
296.	5/8/2013	Amendment to License Agreement	AE000436		M	A/I/R/H/U P***
297.	11/29/2013	Follow up	AE000303		M	A/I/R/H/U P***
298.	4/30/2014	Andrea Rossi	IH-00124079	Ampene gro - 15	M	A/I/R/H/U P***
299.	5/18/2015	Rossi Meeting Wed	IH-00127256		E	A/I/R/H/U P***
300.	4/24/2016	Thursday's Meeting	AE000355		M	A/I/R/H/U P***
301.	3/11/2016	E-CAT Video Tests	IH-00112628		M	A/I/R/H/U P***
302.	8/13/2012	Comments	IH-00083161 - IH-00083164		M	A/I/R/H/U P***
303.	6/12/2015	Call	IH-00131061 - IH-00131062		M	A/I/R/H/U P***
304.	6/29/2015	Update	AE000345.001 - AE000345.002		M	A/I/R/H/U P***
305.	9/00/2004	Application of Thermoelectrice Devices to Fuel Cell Power Generation - Demonstration and Evaluation			M	A/I/R/H/U P***
306.	7/11/2013	Industrial Heat	IH-00096377 - IH-00096393		E	A/I/R/H/U P***
307.	7/00/2014	Confidential Memorandum Industrial Heat, LLC IPH International B.V.	IH-00122484 - IH-00122508		E	A/I/R/H/U P***
308.	11/4/2015	Info regarding business problem	IH-00079768 - IH-00079769		M	A/I/R/H/U P***
309.	710/2014	Andrea Rossi - Next important step	IH-00007126 - IH-00007127		E	A/I/R/H/U P***
310.	12/17/2014	Measurement systems	IH-00007059 - IH-00007060		M	A/I/R/H/U P***
311.	2/22/2016	IPH/Rossi Information from Penon relating to how he was going to perfoorm his tests or	IH-00120575 - IH-00120577		E	A/I/R/H/U P***



		measurements				
312.	10/12/2015	visit of the ERV	IH-00131063		E	A/I/R/H/U P***
313.	2/18/2015	New Mantras	IH-00019126 - IH-00019128		M	A/I/R/H/U P***
314.	9/23/2015	My Memo to Andrea	IH-00120826 - IH-00120828		E	A/I/R/H/U P***
315.	3//4/2016	IH public statement	IH-00125703 - IH-00125705		E	A/I/R/H/U P***
316.	2/6/2016	Industrial Heat of RTP, North Carolina	IH-00071875 - IH-0071877		E	A/I/R/H/U P***
317.	3/2/2014	Thanks for the report	IH-00007623 - IH-00007624		M	A/I/R/H/U P***
318.	10/2/2014	Some quick questions	IH-00107140 - IH-000107141		M	A/I/R/H/U P***
319.	3/17/2015	Paper Cook Rossi	IH-00018838 -		M	A/I/R/H/U P***
320.	2/9/2015	Theoretical paper	IH-00089665 - IH-00089666		E	A/I/R/H/U P***
321.	4/10/2015	Chinese	IH-00007010 - IH-00007011		E	A/I/R/H/U P***
322.		Marketing Brochure – Cherokee – cherokeefund.com		Ex. 2A SJ	E	A/I/R/H/U P***
323.	1/21/2013	Contribution Agreement between IH and AmPenegro, Inc.	IH-00044233 – IH-00044248		M	A/I/R/H/U P***
324.	4/29/2013	Validation Agreement	IH-00044256 – IH-00044266  Rossi00008733 Rossi00008741		E	A/I/R/H/U P***
325.	4/29/2013	Escrow Agreement	IH-00044267 – IH--00044279		E	A/I/R/H/U P***
326.	5/2/2013	Manual – New Production Technologies of Energy E-CAT MW1 – HOT CAT – COLLECTION OF TEST REPORTS	IH-00015632 – IH-00015647		E	A/I/R/H/U P***
327.		Letter from Ing. Ruggero Giunti to Azienda	IH-00044265 – IH-00044266		M	A/I/R/H/U P***
328.	12//2/2013	Interesting Data	IH-00060746 – IH-00060747		E	A/I/R/H/U P***
329.	2/2/2015	Update from Andrea Rossi	IH-00011241		M	A/I/R/H/U P***
330.	6/17/2015	Update from Andrea Rossi	IH-00006765 – IH-00006767		E	A/I/R/H/U P***
331.	2/18/2015	Update from Andrea Rossi	IH-00007017		E	A/I/R/H/U P***
332.	8/30/2015	Andrea – Update	IH-00011219		M	A/I/R/H/U P***
333.	2/21/2015	Update from the 1MW plant Update from the MW1 plant	IH-00011240		M	A/I/R/H/U P***
334.	11/1/2015	Andrea Rossi Update	IH-00011244		M	A/I/R/H/U P***

335.	3/25/2015	Andrea update	IH-00011264		M	A/I/R/H/U P***
336.	6/7/2015	For your review 2/2	IH-00011347 – IH-00011348		M	A/I/R/H/U P***
337.	6/17//2015	Update from Andrea Rossi	IH-00011351 – IH-00011353		M	A/I/R/H/U P***
338.	2/21/2015	Update from the 1MW plant Update from the MW1 plant	IH-00011240		M	A/I/R/H/U P***
339.	1/12/2016	Report	IH-00006696 – IH-00006711		E	A/I/R/H/U P***
340.	10/22/2015	Report	IH-00006739 – IH-00006743		E	A/I/R/H/U P***
341.	5/28/2015	Reports	IH-00006768 – IH-00006782		E	A/I/R/H/U P***
342.	4/21/2015	Confidential Memorandum – Industrial Heat Update, March 16 <sup>th</sup> – April 17, 2015	IH-00021986 – IH-00021991		M	A/I/R/H/U P***
343.	5/15/2015	Industrial Heat	IH-00080193 – IH-00080194		M	A/I/R/H/U P***
344.	3/4/2016	IH public statement	IH-00099714 – IH-00099715		E	A/I/R/H/U P***
345.	11/2/2015	Industrial Heat Business Development Update	IH-00112920 – IH-00112923		M	A/I/R/H/U P***
346.	3/29/2016	Energy multiple final report	IH000006661 – IH-00006691		E	A/I/R/H/U P***
347.	8/25/2015	United States Patent – Rossi – Patent No. US 9,115,913 B1	A – Cmp – DE 1		M	A/I/R/H/U P***
348.	9/00/2015	Supplement too Confidential Memo	IH-00022220		M	A/I/R/H/U P***
349.		Test Results – COP Actual	IH-00000861		E	A/I/R/H/U P***
350.		Test results COP	IH-00001890 – IH-00001908		E	A/I/R/H/U P***
351.	12/8/2013	Darden E-Mail	IH-00081796		E	A/I/R/H/U P***
352.	12/2/2013	Vaughn E-Mail – COP	IH-00124608		M	A/I/R/H/U P***
353.	9/00/2014	Vaughn E-Mail – operations	IH-00107420		E	A/I/R/H/U P***
354.	7/10/2014	E-Mail between Darden and Rossi – 1MW in JM agreement	IH-00007105		M	A/I/R/H/U P***
355.			IH-00080640		E	A/I/R/H/U P***
356.			IH-00011871		E	A/I/R/H/U P***
357.	9/2	E-Mail between Darden and Vaughn re: ERV	IH-00094574		M	A/I/R/H/U P***
358.	2/11/2015	E-Mail from Darden to Gregory Ashley re: plant	IH-00080601		M	A/I/R/H/U P***
359.	4/14/2015	E-Mail Knight to Fogelman	IH-00014201		M	A/I/R/H/U P***
360.	10/7/2015	Leonardo letter re: paying Penon	IH-00006747		M	A/I/R/H/U

						P***
361.		Woodford Agreement	IH-00103619 – IH-00103638		E	A/I/R/H/U P***
362.		Queries sent by Joseph Murray to Penon	IH-00011085 – IH-00011093		E	A/I/R/H/U P***
363.		Power and utility records obtained via subpoena	INDUSTRIALH EAT_MDWS- 0001 - 0049		M	A/I/R/H/U P***
364.	1/28/2016	Absorbment Data	IH-00016331 – IH-00016350		M	A/I/R/H/U P***
365.	6/22/2012 10/26/2012	All e-mails produced by Industrial Heat dated between June 22, 2012 – October 26, 2012 – License Agreement – Due Diligence performed by Industrial Heat			E	A/I/R/H/U P***
366.	7/5/2014 8/13/2014	All e-mails produced by Industrial Heat dated between July 5, 2014 – August 13, 2014 – Term Sheet – Due Diligence performed by Industrial Heat			E	A/I/R/H/U P***
367.		Documents addressing attempts by Industrial Heat or others on its behalf to replicate or test an E-Cat Product or a device derived from the E-Cat IP	IH-00000001  IH-00000141 – IH-00002799		E	A/I/R/H/U P***
		Documents supporting Industrial Heat's claims for damages against Rossi including	IH-00000002 – IH-00000140  IH-00002997 – IH-00003001  IH-00002266 – IH-00002315  IH-00022561 – IH-00022594  IH-00044338 – IH-00044385  IH-00052613 – IH-00052664  IH-00131928 – IH-00131938  IH-00131978 – IH-00131981  IH-00132055 – IH-00132129  IH-00132033 – IH-00132051		E	A/I/R/H/U P***

368.		Documents reflecting Industrial Heat's disclosures of the E-Cat IP to patent offices of other agencies involved in the patent application process	IH-00041884 – IH-00043967		E	A/I/R/H/U P***
369.		Documents addressing any public statement by Industrial Heat, IPH Int'l, Cherokee,	IH-00002253 – IH-00002263		E	A/I/R/H/U P***
370.			IH-00030826 – IH-00033949		M	A/I/R/H/U P***
371.			IH-00034019 – IH-00034530		M	A/I/R/H/U P***
372.			IHH-00034608 – IH-00034817		M	A/I/R/H/U P***
373.			IH-00034954 – IH-00036831		M	A/I/R/H/U P***
374.			IH-00036899 – IH-00037317		M	A/I/R/H/U P***
375.			IH-00037402		M	A/I/R/H/U P***
376.		Exhibit A attached to IPH International, B.V.'s Response and Objections to Plaintiff, Andrea Rossi's First Set of Interrogatories			M	A/I/R/H/U P***
377.		Exhibit B attached to IPH International, B.V.'s Response and Objections to Plaintiff, Andrea Rossi's First Set of Interrogatories			M	A/I/R/H/U P***
378.			IH-00014673		M	A/I/R/H/U P***
379.			IH-00003745		M	A/I/R/H/U P***
380.			IH-00013195		M	A/I/R/H/U P***
381.			IH-00092023		M	A/I/R/H/U P***
382.			IH-00011989		M	A/I/R/H/U P***
383.	8/12/20014	E-Mail chain between C. Sauer, A Groborz and Andrea Rossi regarding payment to Johnson Matthey	Rossi_00008573 – Rossi_00008577		M	A/I/R/H/U P***
384.	7/16/2014	E-Mail between Andrea Rossi and M. Jaszal regarding ordering product from Johnson Matthey	Rossi_00003235		M	A/I/R/H/U P***
385.	7/27/2014	E-Mail between Andrea Rossi and D. O'Brien regarding product from Johnson Matthey	Rossi_00004692		M	A/I/R/H/U P***
386.	8/1/2014	E-Mail between A. Groborz, D. O'Brien, and Andrea Rossi with Johnson Matthey invoice	Rossi_00008685 – Rossi_00008688		M	A/I/R/H/U P***
387.	4/27/2015	E-Mail between Andrea Rossi, M. McGill, M. Livengood, E.A., an M. Kneisly regarding quote for product	Rossi_00004876 – Rossi_00004877		M	A/I/R/H/U P***
388.	4/28/2015	E-Mail between Fabiani, M. McGill, Andrea Rossi and others regarding completed order form	Rossi_00001139 – Rossi_00001145		M	A/I/R/H/U P***

389.		Deposition transcripts of AmPenegro, Inc and all exhibits referenced			M	A/I/R/H/U P***
390.		Deposition transcripts of Barry West and all exhibits referenced			M	A/I/R/H/U P***
391.		Deposition transcripts of James Bass and all exhibits referenced			M	A/I/R/H/U P***
392.		Deposition transcripts of The Boeing Company and all exhibits referenced			M	A/I/R/H/U P***
393.		Deposition transcripts of Cherokee Investment Partners, LLC and all exhibits referenced			M	A/I/R/H/U P***
394.		Deposition transcripts of Thomas Barker Dameron, III and all exhibits referenced			M	A/I/R/H/U P***
395.		Deposition transcripts of Thomas Darden and all exhibits referenced			M	A/I/R/H/U P***
396.		Deposition transcripts of Fulvio Fabiani and all exhibits referenced			M	A/I/R/H/U P***
397.		Deposition transcripts of Industrial Heat,, LLC and all exhibits referenced			M	A/I/R/H/U P***
398.		Deposition transcripts of IPH International, BV and all exhibits referenced			M	A/I/R/H/U P***
399.		Deposition transcripts of James Stokes and all exhibits referenced			M	A/I/R/H/U P***
400.		Deposition transcripts of J.M. Products, Inc. and all exhibits referenced			M	A/I/R/H/U P***
401.		Deposition transcripts of Leonardo Corporation and all exhibits referenced			M	A/I/R/H/U P***
402.		Deposition transcripts of John Mazzarino and all exhibits referenced			M	A/I/R/H/U P***
403.		Deposition transcripts of Joseph Alan Murray and all exhibits referenced			M	A/I/R/H/U P***
404.		Deposition transcripts of Fabio Penon and all exhibits referenced			M	A/I/R/H/U P***
405.		Deposition transcripts of Rick A. Smith, P.E. and all exhibits referenced			M	A/I/R/H/U P***
406.		Deposition transcripts of Dr. Andrea Rossi and all exhibits referenced			M	A/I/R/H/U P***
407.		Deposition transcripts of John Thomas Vaughn and all exhibits referenced			M	A/I/R/H/U P***

408.		Deposition transcripts of John Dewey Weaver, III and all exhibits referenced			M	A/I/R/H/U P***
409.		Deposition transcripts of Dr. Kau-Fui Vincent Wong and all exhibits referenced			M	A/I/R/H/U P***
410.		Any and all Interrogatory Responses and Supplements and/or Amendments thereto			M	A/I/R/H/U P***
411.		Any and all documents referenced and/or identified in response to Interrogatories not specifically referenced herein			M	A/I/R/H/U P***
412.		Any and all Responses to Request for Production and any Supplements and/or Amendments thereto			M	A/I/R/H/U P***
413.		Any and all documents referenced and/or identified in response to Request for Production not specifically referenced herein.			M	A/I/R/H/U P***
414.		Any and all Responses to Request for Admissions and any Supplements and/or Amendments thereto			M	A/I/R/H/U P***
415.		Any and all deposition exhibits marked not specifically referenced herein.			M	A/I/R/H/U P***
416.		Any and all documents produced by the parties in this case not specifically referenced herein.			M	A/I/R/H/U P***
417.		Any and all documents produced by non-parties in this case not specifically referenced herein.			M	A/I/R/H/U P***
418.		All Affidavits filed in this case and all exhibits referenced therein			M	A/I/R/H/U P***
419.		All exhibits attached to any documents in this case.			M	A/I/R/H/U P***
420.		Any and all pleadings filed in this case			M	A/I/R/H/U P***
421.		All documents necessary for impeachment			M	A/I/R/H/U P***
422.		All documents necessary for rebuttal			M	A/I/R/H/U P***
423.		All documents referenced in Defendants' Trial Exhibit List			M	A/I/R/H/U P***
424.		All documents referenced in Third Party Defendants' Trial Exhibit List			M	A/I/R/H/U P***

425.	2013-09-25		BOE_000342		M	A/I/R/H/U P***
426.	2014-02-21		BOE_000557		M	A/I/R/H/U P***
427.			BOE_000911		M	A/I/R/H/U P***
428.	2015-06-01		CTRLED000000 057		M	A/I/R/H/U P***
429.	2015-06-06		CTRLED000001 305		M	A/I/R/H/U P***
430.	2013-01-24		CTRLED000001 306		M	A/I/R/H/U P***
431.			IH-00000854		M	A/I/R/H/U P***
432.			IH-00001890		M	A/I/R/H/U P***
433.	2015-04-13		IH-00007009		M	A/I/R/H/U P***
434.	2014-12-17		IH-00007059		M	A/I/R/H/U P***
435.	2014-12-17		IH-00007061		M	A/I/R/H/U P***
436.	2012-08-23		IH-00010920		M	A/I/R/H/U P***
437.	2016-02-23		IH-00011095		M	A/I/R/H/U P***
438.	2015-05-26		IH-00011096		M	A/I/R/H/U P***
439.	2015-05-26		IH-00011100		M	A/I/R/H/U P***
440.	2016-01-12		IH-00011101		M	A/I/R/H/U P***
441.	2015-10-21		IH-00011103		M	A/I/R/H/U P***
442.	2015-05-28		IH-00011104		M	A/I/R/H/U P***
443.	2015-05-26		IH-00011106		M	A/I/R/H/U P***
444.	2016-01-12		IH-00011108		M	A/I/R/H/U P***
445.	2015-10-21		IH-00011110		M	A/I/R/H/U P***
446.	2015-05-26		IH-00011111		M	A/I/R/H/U P***
447.	2016-01-12		IH-00011113		M	A/I/R/H/U P***
448.	2016-01-12		IH-00011115		M	A/I/R/H/U P***
449.	2015-10-22		IH-00011117		M	A/I/R/H/U P***
450.	2016-01-12		IH-00011119		M	A/I/R/H/U

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451.	2016-01-11		IH-00011121		M	A/I/R/H/U P***
452.	2016-01-12		IH-00011122		M	A/I/R/H/U P***
453.	2015-05-26		IH-00011124		M	A/I/R/H/U P***
454.	2016-01-12		IH-00011126		M	A/I/R/H/U P***
455.	2015-02-10		IH-00011128		M	A/I/R/H/U P***
456.	2015-05-19		IH-00011132		M	A/I/R/H/U P***
457.	2015-10-28		IH-00011134		M	A/I/R/H/U P***
458.	2014-07-30		IH-00011865		M	A/I/R/H/U P***
459.	2014-07-23		IH-00011886		M	A/I/R/H/U P***
460.	2016-04-13		IH-00015773		M	A/I/R/H/U P***
461.	2015-07-31		IH-00017328		M	A/I/R/H/U P***
462.	2015-07-31		IH-00017329		M	A/I/R/H/U P***
463.	2015-06-10		IH-00017860		M	A/I/R/H/U P***
464.	2015-04-13		IH-00018751		M	A/I/R/H/U P***
465.	2015-03-16		IH-00018816		M	A/I/R/H/U P***
466.	2015-02-22		IH-00019077		M	A/I/R/H/U P***
467.	2015-02-18		IH-00019126		M	A/I/R/H/U P***
468.	2012-09-28		IH-00021323		M	A/I/R/H/U P***
469.	2012-09-20		IH-00021510		M	A/I/R/H/U P***
470.	2012-09-20		IH-00021511		M	A/I/R/H/U P***
471.	2012-09-21		IH-00021529		M	A/I/R/H/U P***
472.	2012-09-05		IH-00021578		M	A/I/R/H/U P***
473.	2013-07-16		IH-00022072		M	A/I/R/H/U P***
474.	2016-05-27		IH-00022078		M	A/I/R/H/U P***
475.	2016-05-24		IH-00022338		E	A/I/R/H/U P***



476.	2013-01-28		IH-00028202		M	A/I/R/H/U P***
477.	2015-05-21		IH-00029888		M	A/I/R/H/U P***
478.			IH-00030546		M	A/I/R/H/U P***
479.	2015-09-02		IH-00052007		M	A/I/R/H/U P***
480.			IH-00053931		M	A/I/R/H/U P***
481.	2014-10-13		IH-00054257		M	A/I/R/H/U P***
482.	2014-07-13		IH-00054268		M	A/I/R/H/U P***
483.	2013-02-04		IH-00057708		M	A/I/R/H/U P***
484.	2013-03-03		IH-00057968		M	A/I/R/H/U P***
485.	2013-04-01		IH-00058152		M	A/I/R/H/U P***
486.	2013-04-01		IH-00058175		M	A/I/R/H/U P***
487.	2013-04-03		IH-00058294		M	A/I/R/H/U P***
488.	2013-04-03		IH-00058326		M	A/I/R/H/U P***
489.	2013-04-15		IH-00058523		M	A/I/R/H/U P***
490.	2013-04-24		IH-00058682		M	A/I/R/H/U P***
491.	2013-08-12		IH-00060110		M	A/I/R/H/U P***
492.	2013-12-02		IH-00060748		M	A/I/R/H/U P***
493.	2014-07-26		IH-00063019		M	A/I/R/H/U P***
494.	2014-09-17		IH-00063339		M	A/I/R/H/U P***
495.	2015-02-06		IH-00065066		M	A/I/R/H/U P***
496.	2015-01-06		IH-00065067		M	A/I/R/H/U P***
497.	2015-03-11		IH-00065240		M	A/I/R/H/U P***
498.	2016-02-06		IH-00071875		M	A/I/R/H/U P***
499.	2016-01-07		IH-00071878		M	A/I/R/H/U P***
500.			IH-00071880		M	A/I/R/H/U P***
501.	2015-01-24		IH-00071881		M	A/I/R/H/U

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502.			IH-00071885		M	A/I/R/H/U P***
503.	2016-02-18		IH-00072004		M	A/I/R/H/U P***
504.	2016-02-22		IH-00072126		M	A/I/R/H/U P***
505.	2016-04-06		IH-00073235		M	A/I/R/H/U P***
506.	2016-04-08		IH-00073357		M	A/I/R/H/U P***
507.	2016-04-08		IH-00073410		M	A/I/R/H/U P***
508.	2016-04-11		IH-00079612		M	A/I/R/H/U P***
509.	2016-02-27		IH-00079708		M	A/I/R/H/U P***
510.	2014-12-14		IH-00080643		M	A/I/R/H/U P***
511.	2014-11-04		IH-00080779		M	A/I/R/H/U P***
512.	2014-11-04		IH-00080780		M	A/I/R/H/U P***
513.	2014-08-16		IH-00081280		M	A/I/R/H/U P***
514.	2014-06-25		IH-00081410		M	A/I/R/H/U P***
515.	2014-03-03		IH-00081608		M	A/I/R/H/U P***
516.	2014-02-03		IH-00081672		M	A/I/R/H/U P***
517.	2013-07-15		IH-00082315		M	A/I/R/H/U P***
518.	2013-07-10		IH-00082386		M	A/I/R/H/U P***
519.	2013-06-26		IH-00082394		M	A/I/R/H/U P***
520.	2013-07-09		IH-00082414		M	A/I/R/H/U P***
521.	2013-05-09		IH-00083012		M	A/I/R/H/U P***
522.	2012-08-16		IH-00083129		M	A/I/R/H/U P***
523.	2012-08-15		IH-00083131		M	A/I/R/H/U P***
524.	2012-08-15		IH-00083156		M	A/I/R/H/U P***
525.	2012-06-26		IH-00083404		M	A/I/R/H/U P***
526.	2012-05-18		IH-00083504		M	A/I/R/H/U P***

527.	2013-06-12		IH-00083774		M	A/I/R/H/U P***
528.	2013-06-12		IH-00083775		M	A/I/R/H/U P***
529.	2013-06-12		IH-00083777		M	A/I/R/H/U P***
530.	2012-10-25		IH-00084279		M	A/I/R/H/U P***
531.	2012-10-24		IH-00084292		M	A/I/R/H/U P***
532.	2012-10-24		IH-00084295		M	A/I/R/H/U P***
533.	2012-10-22		IH-00084336		M	A/I/R/H/U P***
534.	2012-09-29		IH-00084442		M	A/I/R/H/U P***
535.	2012-09-26		IH-00084443		M	A/I/R/H/U P***
536.	2012-09-25		IH-00084445		M	A/I/R/H/U P***
537.	2016-02-23		IH-00084752		M	A/I/R/H/U P***
538.	2015-09-25		IH-00084792		M	A/I/R/H/U P***
539.	2016-04-25		IH-00087145		M	A/I/R/H/U P***
540.	2016-01-10		IH-00087551		M	A/I/R/H/U P***
541.	2016-01-08		IH-00087553		M	A/I/R/H/U P***
542.	2016-01-08		IH-00087583		M	A/I/R/H/U P***
543.	2015-07-22		IH-00088933		M	A/I/R/H/U P***
544.	2013-07-12		IH-00089247		M	A/I/R/H/U P***
545.	2014-07-04		IH-00090966		M	A/I/R/H/U P***
546.	2014-06-16		IH-00091647		M	A/I/R/H/U P***
547.			IH-00091648		M	A/I/R/H/U P***
548.	2014-04-30		IH-00091717		M	A/I/R/H/U P***
549.	2014-04-12		IH-00091805		M	A/I/R/H/U P***
550.	2013-12-06		IH-00093714		M	A/I/R/H/U P***
551.	2013-12-05		IH-00093731		M	A/I/R/H/U P***
552.	2013-12-03		IH-00093732		M	A/I/R/H/U

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553.	2013-12-03		IH-00093797		M	A/I/R/H/U P***
554.	2013-11-18		IH-00093959		M	A/I/R/H/U P***
555.	2013-11-07		IH-00094088		M	A/I/R/H/U P***
556.	2013-11-07		IH-00094089		M	A/I/R/H/U P***
557.	2013-11-05		IH-00094104		M	A/I/R/H/U P***
558.	2013-05-08		IH-00098062		M	A/I/R/H/U P***
559.	2013-05-08		IH-00098064		M	A/I/R/H/U P***
560.	2013-04-23		IH-00098415		M	A/I/R/H/U P***
561.	2013-05-26		IH-00098825		M	A/I/R/H/U P***
562.	2013-05-26		IH-00098826		M	A/I/R/H/U P***
563.	2012-06-25		IH-00098983		M	A/I/R/H/U P***
564.	2016-03-04		IH-00099691		M	A/I/R/H/U P***
565.	2016-01-05		IH-00100786		M	A/I/R/H/U P***
566.	2015-11-04		IH-00101589		M	A/I/R/H/U P***
567.			IH-00101590		M	A/I/R/H/U P***
568.			IH-00101601		M	A/I/R/H/U P***
569.	2015-11-04		IH-00101608		M	A/I/R/H/U P***
570.	2015-09-21		IH-00101752		M	A/I/R/H/U P***
571.			IH-00101754		M	A/I/R/H/U P***
572.	2014-11-21		IH-00105494		M	A/I/R/H/U P***
573.			IH-00105496		M	A/I/R/H/U P***
574.	2014-11-13		IH-00105691		M	A/I/R/H/U P***
575.	2014-11-06		IH-00105695		M	A/I/R/H/U P***
576.	2015-02-16		CTRLED000014 739		E	A/I/R/H/U P***
577.	2015-05-28		IH-00006768		E	A/I/R/H/U P***

578.	2015-05-26		IH-00006769		E	A/I/R/H/U P***
579.	2015-05-28		IH-00006773		E	A/I/R/H/U P***
580.	2015-05-19		IH-00006775		E	A/I/R/H/U P***
581.	2015-05-26		IH-00006776		E	A/I/R/H/U P***
582.	2015-05-26		IH-00006778		E	A/I/R/H/U P***
583.	2015-05-26		IH-00006780		E	A/I/R/H/U P***
584.	2015-05-26		IH-00006782		E	A/I/R/H/U P***
585.	2016-02-23		IH-00011095		E	A/I/R/H/U P***
586.	2015-05-26		IH-00011096		E	A/I/R/H/U P***
587.	2015-05-26		IH-00011100		E	A/I/R/H/U P***
588.	2016-01-12		IH-00011101		E	A/I/R/H/U P***
589.	2015-10-21		IH-00011103		E	A/I/R/H/U P***
590.	2015-05-28		IH-00011104		E	A/I/R/H/U P***
591.	2015-05-26		IH-00011106		E	A/I/R/H/U P***
592.	2016-01-12		IH-00011108		E	A/I/R/H/U P***
593.	2015-10-21		IH-00011110		E	A/I/R/H/U P***
594.	2015-05-26		IH-00011111		E	A/I/R/H/U P***
595.	2016-01-12		IH-00011113		E	A/I/R/H/U P***
596.	2016-01-12		IH-00011115		E	A/I/R/H/U P***
597.	2015-10-22		IH-00011117		E	A/I/R/H/U P***
598.	2016-01-12		IH-00011119		E	A/I/R/H/U P***
599.	2016-01-11		IH-00011121		E	A/I/R/H/U P***
600.	2016-01-12		IH-00011122		E	A/I/R/H/U P***
601.	2015-05-26		IH-00011124		E	A/I/R/H/U P***
602.	2016-01-12		IH-00011126		E	A/I/R/H/U P***
603.	2015-02-10		IH-00011128		E	A/I/R/H/U

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604.	2015-05-19		IH-00011132	E	A/I/R/H/U P***
605.	2014-04-30		IH-00012328	E	A/I/R/H/U P***
606.	2014-04-29		IH-00012329	E	A/I/R/H/U P***
607.	2014-04-29		IH-00012398	E	A/I/R/H/U P***
608.	2012-06-20		IH-00012461	E	A/I/R/H/U P***
609.	2014-04-30		IH-00012463	E	A/I/R/H/U P***
610.	2016-01-28		IH-00016331	E	A/I/R/H/U P***
611.	2016-01-28		IH-00016332	E	A/I/R/H/U P***
612.	2015-02-18		IH-00019098	E	A/I/R/H/U P***
613.	2015-02-18		IH-00019116	E	A/I/R/H/U P***
614.			IH-00019120	E	A/I/R/H/U P***
615.	2016-01-12		IH-00022043	E	A/I/R/H/U P***
616.	2014-10-21		IH-00030180	E	A/I/R/H/U P***
617.	2014-10-20		IH-00030202	E	A/I/R/H/U P***
618.			IH-00042569	E	A/I/R/H/U P***
619.			IH-00043194	E	A/I/R/H/U P***
620.			IH-00043602	E	A/I/R/H/U P***
621.			IH-00043912	E	A/I/R/H/U P***
622.	2013-02-16		IH-00057793	E	A/I/R/H/U P***
623.	2013-04-09		IH-00058462	E	A/I/R/H/U P***
624.	2013-04-15		IH-00058504	E	A/I/R/H/U P***
625.	2013-04-24		IH-00058686	E	A/I/R/H/U P***
626.	2013-12-02		IH-00060746	E	A/I/R/H/U P***
627.	2016-03-29		IH-00079629	E	A/I/R/H/U P***
628.	2016-03-29		IH-00079630	E	A/I/R/H/U P***

629.	2016-03-29		IH-00079632		E	A/I/R/H/U P***
630.	2016-03-29		IH-00079635		E	A/I/R/H/U P***
631.	2016-03-29		IH-00079637		E	A/I/R/H/U P***
632.	2016-03-29		IH-00079638		E	A/I/R/H/U P***
633.	2016-03-29		IH-00079643		E	A/I/R/H/U P***
634.	2016-03-29		IH-00079644		E	A/I/R/H/U P***
635.	2016-03-29		IH-00079646		E	A/I/R/H/U P***
636.	2016-03-29		IH-00079648		E	A/I/R/H/U P***
637.	2016-03-29		IH-00079650		E	A/I/R/H/U P***
638.	2016-03-29		IH-00079652		E	A/I/R/H/U P***
639.	2016-03-29		IH-00079654		E	A/I/R/H/U P***
640.	2016-03-29		IH-00079656		E	A/I/R/H/U P***
641.	2016-03-29		IH-00079658		E	A/I/R/H/U P***
642.	2015-03-23		IH-00080561		E	A/I/R/H/U P***
643.	2014-10-06		IH-00080962		E	A/I/R/H/U P***
644.	2014-10-06		IH-00080963		E	A/I/R/H/U P***
645.	2014-07-28		IH-00081286		E	A/I/R/H/U P***
646.			IH-00081288		E	A/I/R/H/U P***
647.	2013-10-05		IH-00081951		E	A/I/R/H/U P***
648.	2012-06-18		IH-00083439		E	A/I/R/H/U P***
649.	2012-06-18		IH-00083441		E	A/I/R/H/U P***
650.	2013-05-20		IH-00083789		E	A/I/R/H/U P***
651.	2013-05-19		IH-00083790		E	A/I/R/H/U P***
652.	2012-10-26		IH-00084265		E	A/I/R/H/U P***
653.	2012-10-26		IH-00084267		E	A/I/R/H/U P***
654.	2015-07-13		IH-00088952		E	A/I/R/H/U

						P***
655.	2013-07-10		IH-00089277		E	A/I/R/H/U P***
656.	2014-07-14		IH-00090771		E	A/I/R/H/U P***
657.	2014-07-14		IH-00090772		E	A/I/R/H/U P***
658.	2014-07-14		IH-00090798		E	A/I/R/H/U P***
659.	2013-09-16		IH-00094950		E	A/I/R/H/U P***
660.	2013-09-16		IH-00094951		E	A/I/R/H/U P***
661.	2013-04-17		IH-00098556		E	A/I/R/H/U P***
662.	2015-08-27		IH-00101880		E	A/I/R/H/U P***
663.			IH-00101884		E	A/I/R/H/U P***
664.	2013-05-06		IH-00101918		E	A/I/R/H/U P***
665.	2013-05-06		IH-00101919		E	A/I/R/H/U P***
666.	2013-05-06		IH-00101933		E	A/I/R/H/U P***
667.			IH-00101939		E	A/I/R/H/U P***
668.	2013-05-06		IH-00101940		E	A/I/R/H/U P***
669.	2013-05-06		IH-00101941		E	A/I/R/H/U P***
670.	2015-01-06		IH-00105142		E	A/I/R/H/U P***
671.	2015-01-06		IH-00105143		E	A/I/R/H/U P***
672.	2014-10-21		IH-00106293		E	A/I/R/H/U P***
673.	2014-10-17		IH-00106296		E	A/I/R/H/U P***
674.	2014-10-17		IH-00106341		E	A/I/R/H/U P***
675.	2014-10-17		IH-00106342		E	A/I/R/H/U P***
676.	2014-10-15		IH-00106367		E	A/I/R/H/U P***
677.	2014-10-19		IH-00106393		E	A/I/R/H/U P***
678.	2014-10-19		IH-00106395		E	A/I/R/H/U P***
679.	2014-10-15		IH-00106418		E	A/I/R/H/U P***



680.	2013-10-01		IH-00013924		M	A/I/R/H/U P***
681.	2013-09-12		IH-00014329		M	A/I/R/H/U P***
682.			IH-00014330		M	A/I/R/H/U P***
683.	2015-08-23		IH-00017312		M	A/I/R/H/U P***
684.	2015-02-22		IH-00019073		M	A/I/R/H/U P***
685.	2016-02-02		IH-00125859		M	A/I/R/H/U P***

**DEFENDANTS EXHIBITS:**

Defendants, Thomas Darden, John T. Vaughn, Industrial Heat, LLC., IPH International, B.V. and Cherokee Investment Partners, LLC (collectively, “Defendants”), hereby file their Exhibit List.

<b>Exhibit Number</b>	<b>Description</b>	<b>Expect to Offer/May Offer</b>	<b>Plaintiffs' Objections</b>	<b>Third-Party Defendants' Objections</b>
1.	Compl. Ex. B (October 26, 2012 License Agreement)	Expect to offer		
2.	4th Am. AACT Ex. 9 (April 23, 2013 email from Rossi to Darden and Vaughn)	Expect to offer		
3.	IH-00098392-00098394 (April 24, 2013 email chain involving Rossi, Darden, and Vaughn)	May offer		
4.	IH-00098395-00098396 (April 24, 2013 email from Rossi to Darden, Vaughn, and Mazzarino, cc Penon)	May offer		
5.	Compl. Ex. C (April 29, 2013 First Amendment to License Agreement)	Expect to offer		
6.	4th Am. AACT Ex. 7 (April 29, 2013 Assignment and Assumption of License Agreement)	Expect to offer		
7.	4th Am. AACT Ex. 8 (April 29, 2013 Certificate signed by Rossi and Leonardo)	Expect to offer		
8.	Penon Dep. Ex. 8 (PENON0000073-80) (May 5, 2013 email from Penon to Darden, cc Vaughn, Mazzarino, and Rossi, with attachments)	May offer		
9.	AmpEnergco, Inc. Deposition Transcript Excerpts	Expect to offer		
10.	AE000255-000256 (August 12, 2013 email chain involving Fogleman, Vaughn, Darden, Norwood, Cassarino, and Engleman)	May offer	H, R	H, R
11.	Plaintiffs' Responses and Objections to Industrial Heat's First Request for Admissions	Expect to offer		
12.	Compl Ex. D (October __, 2013 Proposed Second Amendment to License Agreement)	Expect to offer		
13.	IH-00089736-00089743 (January 21, 2013 Contribution Agreement between Industrial Heat and AEG)	May offer	H, R	H, R
14.	Leonardo Corp. Dep. Ex. 15 (IH-00091696-91697) (April 30, 2014 email chain involving Rossi,	May offer		

	Cassarino, and Vaughn)			
15.	4th Am. AACT Ex. 3 (Rossi Dep. Ex. 12) (Photographs of 6-Cylinder Hot Cat)	Expect to offer	R, A	R, A
16.	AEG Dep. Ex. 20 (AE000005.001-11) (October 2014, January 2015, February 2015, April 2015, and June 2015 handwritten notes by Cassarino)	May offer	A, R, H	A, R, H
17.	Plaintiffs' Responses and Objections to Industrial Heat's Second Set of Interrogatories	Expect to offer		
18.	<b>Composite</b> Posts from Rossi's Journal of Nuclear Physics from the following dates: <ul style="list-style-type: none"> <li>• July 2, 2015</li> <li>• Dec. 21, 2015</li> <li>• Feb. 9, 2016</li> <li>• Feb. 11, 2016</li> <li>• Feb. 13, 2016</li> <li>• Feb. 18, 2016</li> <li>• Feb. 20, 2016</li> <li>• Feb. 21, 2016</li> <li>• Feb. 22, 2016</li> <li>• March 25, 2016</li> <li>• March 30, 2016</li> <li>• April 27, 2016</li> <li>• June 26, 2016</li> <li>• July 23, 2016</li> </ul>	Expect to offer	A, R, H	A, R, H
19.	Industrial Heat's Responses and Objections to Rossi's Second Set of Interrogatories	May offer	H	H
20.	4th Am. AACT Ex. 23 (February 26, 2016 letter from Jones Day to Plaintiffs' counsel with Assignment)	Expect to offer	A, R, H	A, R, H
21.	IPH's Responses and Objections to Rossi's First Set of Interrogatories	May offer	H	H
22.	IH-00131929 (Spreadsheet of Industrial Heat's expenses paid to Rossi as of February 5, 2016)	Expect to offer	A, H	A, H
23.	<b>Composite</b> (Various invoices from Leonardo to Industrial Heat) <ul style="list-style-type: none"> <li>• IH-00014673 (August 7, 2013)</li> </ul>	Expect to offer		

	<ul style="list-style-type: none"> <li>• IH-00003745 (September 21, 2013)</li> <li>• IH-00013195 (February 28, 2014)</li> <li>• IH-00092023 (February 28, 2014)</li> <li>• IH-00011989 (June 17, 2014)</li> <li>• Leonardo Corp. Dep. Ex. 7 (IH-00016937) (February 27, March 11, August 24, September 16, and November 17, 2015)</li> </ul>			
24.	Rossi_00011665-00011684 (Leonardo's 2012 tax returns)	Expect to offer	R, I, P	R, I, P
25.	<b>Composite</b> (Leonardo's 2013 tax returns) <ul style="list-style-type: none"> <li>• Rossi_00011685-00011704</li> <li>• Rossi_00011715-00011734</li> <li>• Rossi_00011736-00011751</li> </ul>	Expect to offer	R, I, P	R, I, P
26.	AE000358 (Rossi's 2013 tax returns)	Expect to offer	R, I, P	R, I, P
27.	IH-00011175-00011176 (June 3, 2014 email chain involving Rossi, Darden, Vaughn, Pike, Dameron, and Fabiani)	May offer	H	H
28.	Rossi Dep. Ex. 13 (IH-00012026) (June 10, 2014 email from Rossi to Darden, Vaughn, and Pike)	Expect to offer		
29.	Rossi Dep. Ex. 14 (IH-00011150) (June 20-23, 2014 email chain involving Rossi, Darden, Mazzarino, Pike, Vaughn, and Cassarino)	Expect to offer	H	H
30.	IH-00090966-00090967 (July 3-4, 2014 email chain involving Rossi, Cassarino, Vaughn, Darden, and Mazzarino)	Expect to offer	H, R	H, R
31.	4th Am. AACT Ex. 16 (July 5, 2014 email from Rossi to Darden, Pike, Mazzarino, Vaughn, and Dameron)	Expect to offer		
32.	Johnson Dep. Ex. 11 (Articles of Incorporation of J.M. Chemical Products)	Expect to offer	A, R, H	A, R, H
33.	Johnson Dep. Ex. 12 (Articles of Amendment to Articles of Incorporation of J.M. Products)	Expect to offer	A, R, H	A, R, H
34.	IH-00007126-00007127 (July 5-10 email chain involving Rossi, Darden, J. Pike, Mazzarino, Vaughn, and Dameron)	Expect to offer	H, R	H, R

35.	IH-00007120-00007123 (July 9-10, 2014 email chain involving Rossi and Darden regarding Term Sheet/Johnson Matthey)	Expect to offer	H, R	H, R
36.	IH-00007117-00007118 (July 9-10, 2014 email chain involving Rossi and Darden)	Expect to offer	H, R	H, R
37.	<b>Composite</b> (July 10, 2014 email chain involving Darden and Rossi, with attachment (Term Sheet))  <ul style="list-style-type: none"> <li>IH-00007129-00007131</li> <li>IH-00007113-00007114</li> </ul>	Expect to offer	H, R	H, R
38.	<b>Composite</b> (July 11-12, 2014 email chain involving Rossi and Darden, with attachment (Term Sheet))  <ul style="list-style-type: none"> <li>IH-00007110-00007112</li> <li>ROSSI_00000865</li> <li>IH-00090826-00090827</li> </ul>	Expect to offer	H, R	H, R
39.	IH-00089932-00089938 (August 7-10, 2014 email chain involving Vaughn, Rossi, Darden, and Mazzarino, with attachments, regarding Johnson Matthey)	Expect to offer	H	H
40.	<b>Composite</b> (July 30, 2014 email chain involving Rossi, Darden, and Vaughn)  <ul style="list-style-type: none"> <li>IH-00011867-00011870</li> <li>IH-00011871-00011872</li> </ul>	Expect to offer	H	H
41.	IH-00011864 (July 30, 2014 email from Rossi to Darden and Vaughn regarding Johnson Matthey)	Expect to offer		
42.	Johnson Dep. Ex. 50 (IH-00089928-89929) (August 7, 2014 email chain involving Johnson, Vaughn, and Darden, with attachment (OFAC Compliance))	Expect to offer	A, R, H	A, R, H
43.	<b>Composite</b> (August 12-13, 2014 email chain involving Vaughn, Johnson, Darden, Rossi, and Sauer, with attachments)  <ul style="list-style-type: none"> <li>Johnson Dep. Ex. 51 (IH-00011488-11491)</li> <li>Johnson Dep. Ex. 52 (IH-00011492-11497)</li> </ul>	Expect to offer	H	H
44.	4th Am. AACT Ex. 17 (Term Sheet)	Expect to offer		

45.	Johnson Dep. Ex. 15 (HJ000018) (September 1, 2014 email from Rossi to Johnson and Sauer regarding lease of Doral Facility and ordering materials from Johnson Matthey)	Expect to offer	R	R
46.	J.M. Products Dep. Ex. 3 (Rossi_00011389-11390) (Industrial Gross Sublease between Leonardo and J.M. Products)	Expect to offer	R	R
47.	Leonardo Corp. Dep. Ex. 20 (IH-00019055-19056) (February 27, 2015 email chain involving Rossi, Darden, Vaughn, Dameron, Mazzarino, J. Pike, and D. Piker regarding operations at Doral Facility)	Expect to offer	H	H
48.	Johnson Dep. Ex. 17 (HJ000126-127) (March 2-3, 2015 email chain involving Rossi and Sauer regarding JMP letter to IH)	Expect to offer	R, H	R, H
49.	Johnson Dep. Ex. 23 (HJ00341-343) (January 8-9, 2016 email chain involving D. Annesser, Sauer, and Rossi regarding transfer of funds from Leonardo to JMP)	Expect to offer	R, H	R, H
50.	AEG Dep. Ex. 28 (AE000345.001-2) (June 29, 2015 email chain involving Cassarino and Rossi)	Expect to offer	R	R
51.	Bass Dep. Ex. 20 (JB00192-193) (November 5, 2015 email chain involving Rossi and Bass)	May offer	R	R
52.	Rossi_00004860 (November 6, 2015 email chain involving Rossi and Bass)	Expect to offer		
53.	IH-00011231 (February 19, 2015 email chain involving Rossi, Darden, Pike, Mazzarino, and Vaughn)	Expect to offer		
54.	<p><b>Composite</b> (J.M. Products invoices to Industrial Heat)</p> <ul style="list-style-type: none"> <li>Johnson Dep. Ex. 32 (HJ000216) (March 3, 2015)</li> <li>Johnson Dep. Ex. 39 (HJ000214) (January 4, 2016)</li> <li>4th Am. AACT Ex. 18 (Rossi Dep. Ex. 21) (July 1, August 1, September 8, and October 12, 2015; and January 4, 2016)</li> <li>HJ000253 (November 2, 2015)</li> </ul>	Expect to offer	R	R

	<ul style="list-style-type: none"> <li>HJ000215 (December 2, 2015)</li> <li>HJ000232 (February 2, 2016)</li> </ul>			
55.	<p><b>Composite</b> (Various emails from Rossi to Sauer with invoices to be sent from J.M. Products to Industrial Heat)</p> <ul style="list-style-type: none"> <li>Johnson Dep. Ex. 34 (HJ000222-000223) (invoice for July 1, 2015)</li> <li>Johnson Dep. Exs. 35 &amp; 36 (HJ000248-000249, HJ000354-000355) (invoice for August 1, 2015)</li> <li>Johnson Dep. Ex. 37 (HJ000286-288) (invoice for September 8, 2015)</li> <li>Johnson Dep. Ex. 38 (HJ000250-251) (invoice for October 12, 2015)</li> <li>HJ000252-000253 (invoice for November 2, 2015)</li> <li>HJ000254-000255 (invoice for January 4, 2016)</li> <li>HJ000231-000232 (invoice for February 2, 2016)</li> </ul>	Expect to offer	R, H	R, H
56.	Johnson Dep. Ex. 33 (HJ000217) (Rossi's handwritten draft letter from J.M. Products to Industrial Heat)	Expect to offer	R, H	R, H
57.	4th Am. AACT Ex. 20 (Bass Dep. Ex. 28) (Bass's J.M. Products business card)	Expect to offer	R, H	R, H
58.	Johnson Dep. Ex. 16 (HJ000005) (September 1, 2014 email from Rossi to Johnson and Sauer regarding how to respond to inquiries about JMP)	Expect to offer		
59.	Johnson Dep. Ex. 27 (HJ000273-275) (January 21, 2016 email chain involving Sauer and Rossi regarding movement of funds between Leonardo and JMP)	Expect to offer	R	R
60.	Johnson Dep. Ex. 29 (HJ000328) (February 5, 2015 email chain involving Sauer and Rossi regarding movement of funds between Leonardo and JMP)	Expect to offer	R	R
61.	Johnson Dep. Ex. 30 (HJ000302-303) (July 28, 2015 email chain involving Rossi, Johnson, and Sauer regarding movement of funds between	Expect to offer	R	R

	Leonardo and JMP)			
62.	Johnson Dep. Ex. 31 (HJ000377-379) (September 29-30, 2015 email chain involving Bass, Rossi, and Sauer regarding movement of funds between Leonardo and JMP)	Expect to offer	R	R
63.	Johnson Dep. Ex. 18 (HJ000048) (March 16, 2015 email from Rossi to Johnson and Sauer regarding official address of JMP including "Advance derivatives of Johnson Matthey Platinum Sponge")	Expect to offer	R	R
64.	Rossi_00001487-00001491 (July 24, 2014 email from Dalton O' Brien of Johnson Matthey to Rossi, with attachments)	Expect to offer	H, R	H, R
65.	HJ000029-000034 (July 30-August 8, 2014 email chain involving Alain Groborz and Dalton O' Brien of Johnson Matthey, Rossi, Johnson, and Sauer, with attachment)	Expect to offer	R	R
66.	Leonardo Corp. Dep. Ex. 17 (Rossi 00003876) (March 22, 2015 email from Rossi to Dalton O' Brien of Johnson Matthey)	Expect to offer		
67.	Fabiani Dep. Ex. 3 (Fabiani's logbook of measurements of 1 MW Plant)	Expect to offer	R	R
68.	Penon Dep. Ex. 26 (Rossi_00009285-9297) (Rossi's logbook of measurements of 1 MW Plant)	Expect to offer		
69.	Fulvio Fabiani Deposition Transcript Excerpts	May offer		
70.	Murray Dep. Ex. 11 (Expert Disclosure of Joseph A. Murray)	Expect to offer	R, UP	R, UP
71.	<b>Composite</b> (FPL's Responses to Industrial Heat's Subpoena to Produce Documents) <ul style="list-style-type: none"> <li>Murray Dep. Ex. 12 (INDUSTRIALHEAT_FPL-000004-53)</li> <li>Murray Dep. Ex. 13 (INDUSTRIALHEAT_FPL-000054-67)</li> </ul>	Expect to offer	R, H, A	R, H, A
72.	<b>Composite</b> (March 24, 2015 email chain involving Rossi instructing Bass about answering IH's questions about the operations at the Doral Facility)	Expect to offer	R	R



	<ul style="list-style-type: none"> <li>Bass Dep. Ex. 25 (JB000326)</li> <li>Bass Dep. Ex. 26 (JB000323)</li> </ul>			
73.	Bass Dep. Ex. 27 (JB000096-98) (February 14-15, 2016 email chain involving Rossi and Bass about instructing Bass about answering IH's questions about the operations at the Doral Facility )	Expect to offer	R	R
74.	4th Am. AACT Ex. 19 (July 13, 2015 email chain involving Vaughn and Rossi)	Expect to offer	R	R
75.	Johnson Dep. Ex. 40 (HJ000041) (December 9, 2015 email from Vaughn to Rossi, Johnson, and Sauer, cc Darden, Murray, and Dameron)	Expect to offer	H, R	H, R
76.	Johnson Dep. Ex. 41 (HJ000043) (December 9, 2015 letter from Johnson to Vaughn)	Expect to offer		
77.	4th Am. AACT Ex. 5 (Murray's Initial Queries for M. Eng. Fabio Penon as to Measurements of 1 MW Plant)	Expect to offer	R, H	R, H
78.	IH-00131928 (Spreadsheet of Industrial Heat's expenses paid to Fabiani and USQL as of August 18, 2016)	Expect to offer	H, A	H, A
79.	4th Am. AACT Ex. 11 (September 1, 2013 Technical Consulting Agreement)	Expect to offer		
80.	IH-00012657-00012666 (July 30-August 1, 2014 email chain involving Fabiani and Vaughn, with attachment, regarding renewal of USQL agreement)	Expect to offer		
81.	IH-00017713-17721 (July 7, 2015 email from Fabiani to Vaughn, with attachment, regarding renewal of USQL agreement)	Expect to offer		
82.	4th Am. AACT Ex. 29 (IH-00016227-16228) (February 1, 2016 email from Fabiani to Vaughn, with attachment)	Expect to offer		
83.	4th Am. AACT Ex. 21 (February 23, 2016 email from Fabiani to Vaughn, cc Darden)	Expect to offer	R	R
84.	IH-00015792-00015802 (April 6, 2016 email from Fabiani to Vaughn and Darden, with attachments, regarding transfer of raw data)	Expect to offer	R	R

85.	Murray Dep. Ex. 4 (IH-00087145-87148) (March 22-April 25, 2016 email chain involving Fabiani and Murray regarding raw data and payment to Fabiani)	Expect offer	R	R
86.	IH-00011074 (April 26, 2016 email from Murray to Fabiani regarding raw data and payment to Fabiani)	Expect offer	R, H	R, H
87.	Fabiani Dep. Ex. 11 (IH-00011073) (May 16, 2016 email from Murray to Fabiani regarding raw data and payment to Fabiani)	Expect to offer	A	A
88.	Leonardo of New Hampshire Certificate of Good Standing	Expect to offer	A, H, R	A, H, R
89.	Rossi_00006555 (June 1, 2015 email chain involving Rossi, Darden, and Vaughn regarding problems with small E-Cat reactors in Doral)	May offer		
90.	Boeing Deposition Transcript Excerpts	Expect to offer		
91.	IH-00142008-IH-00142009 (Google image of Doral Facility taken on July 16, 2015)	Expect to offer	A, H	A, H
92.	IH-00142001 (Photograph of Doral Facility taken by James Julian on November 11, 2015)	Expect to offer	A, H	A, H
93.	BOE_001662 (Aug. 20, 2013 email involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
94.	BOE_001068 (Jan. 22, 2014 email involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
95.	BOE_001764 (Jan. 29, 2014 email involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
96.	BOE_001663 (Aug. 13, 2014 email involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
97.	BOE_001565-001568 (Nov. 14, 2014 involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
98.	BOE_001087-001091 (Nov. 2014 emails involving Boeing personnel)	Expect to offer	A, H, R	A, H, R
99.	4th Am. AACT Ex. 10 (Ferrara Report)	Expect to offer		

100.	4th Am. AACT Ex. 14 (Lugano Report)	Expect to offer		
101.	4th Am. AACT Ex. 22 (Cook-Rossi Paper)	Expect to offer	R, A, H	R, A, H
102.	4th Am. AACT Ex. 24 (JONP Posts)	Expect to offer	H, R, A	H, R, A
103.	4th Am. AACT Ex. 25 (JONP Posts)	Expect to offer	H, R, A	H, R, A
104.	IH-00010893 (September 2014 email from Rossi to Darden regarding License Agreement)	May offer		
105.	IH-00019088 (February 21, 2015 email from Rossi to Darden, Vaughn, Mazzarino, J. Pike, D. Pike, and Dameron)	Expect to offer		
106.	Rossi_00000001 (Photographs produced by Rossi)	Expect to offer	R	R
107.	Rossi_00000002 (Videos produced by Rossi)	May offer	R	R
108.	IH-00019077-00019078 (February 22, 2015 email chain involving Rossi, Vaughn, Darden, Mazzarino, J. Pike, D. Pike, and Dameron)	May offer	H	H
109.	IH-00128414-00128421 (April 7, 2011 Agreement among AEG, Rossi, and Leonardo)	Expect to offer	R	R
110.	IH-00083173-00083176 (August 6, 2012 email from Darden to Rossi, cc Cassarino, Compton, and Bauman)	May offer	H	H
111.	IH-00010373-00010374 (August 12, 2012 email from Darden to Rossi, cc Cassarino, Compton, and Bauman)	May offer	R, H	R, H
112.	IH-00083161-00083164 (August 13, 2012 email from Cassarino to Darden and Mazzarino, cc Norwood and Engleman, with attachments)	May offer	A, R	A, R
113.	IH-00010924-00010925 (August 23, 2012 email from Darden to Rossi)	May offer		
114.	IH-00010917 (August 28, 2012 email from Darden to Rossi)	May offer	R	R
115.	IH-00010896- IH-00010897 (September 4, 2012	May offer		

	email from Darden to Rossi, cc Mazzarino, Cassarino, and Vaughn, with attachment)			
116.	IH-00021558-00021577 (September 5, 2012 email from Darden to Rossi, cc Cassarino, Mazzarino, and Vaughn)	May offer		
117.	IH-00021529-00021533 (September 20, 2012 email from Darden to Rossi, cc Cassarino, Mazzarino, and Vaughn)	May offer	R	R
118.	IH-00117829 (October 10, 2012 email from Darden to himself)	May offer	H, R	H, R
119.	IH-00112148 (October 11, 2012 email from Norwood to Darden and Mazzarino, cc Vaughn, Engleman, and Cassarino)	Expect to offer	A, H	A, H
120.	IH-00084336-00084343 (October 22, 2012 email from Norwood to Darden and Mazzarino, cc Cassarino and Engleman)	May offer	A, H	A, H
121.	IH-00084295-00084297 (October 23, 2012 email from Darden to Rossi, cc Cassarino and Mazzarino)	May offer	H, R	H, R
122.	IH-00111931-00111933 (October 23, 2012 email from Vaughn to Engleman, cc Darden, Mazzarino, Norwood, and Cassarino, with attachment)	Expect to offer	H, R	H, R
123.	IH-00111867-00111891 (October 24, 2012 email from Kight to Engleman, Norwood, and Cassarino, cc Darden, Mazzarino, and Vaughn, with attachment)	May offer	R, H, A	R, H, A
124.	IH-00132052-00132054 (October 26, 2012 Memorandum of Terms between AEG and IH)	Expect to offer	H, A, R	H, A, R
125.	IH-00082583-00082585 (June 17, 2013 Confidential Industrial Heat Update email)	May offer		
126.	IH-00082222-00082225 (June 19, 2013 "Update on Industrial Heat and new energy technology" email)	May offer	H	H
127.	IH-00117508-00117511 (Industrial Heat December 8, 2013 CONFIDENTIAL Update email)	May offer	H	H
128.	IH-00093556 -00093560 (Industrial Heat January	May offer	H	H

	8, 2014 CONFIDENTIAL Update)			
129.	IH-00081733-00081736 (Industrial Heat Update, January 26, 2014 *CONFIDENTIAL*)	May offer	H, A	H, A
130.	IH-00090508 -00090708 (July 2014 Industrial Heat, LLC IPH International BV Confidential Memorandum)	May offer	H	H
131.	IH-00080849 -00080852 (10/9/14 Industrial Heat Update CONFIDENTIAL)	May offer	H, A	H, A
132.	IH-00126914 -00126925 (May 21, 2015 Industrial Heat Confidential Memorandum)	May offer	H	H
133.	IH-00118071-00118075 (September 2015 Supplement No. 1 to Confidential Memorandum)	May offer	H, A, R	H, A, R
134.	IH-00126939 -00126944 (September 21, 2015 Confidential Memorandum)	May offer	H	H
135.	IH-00101589 -00101609 (November 4, 2015 Strictly Confidential Memorandum)	May offer	H, R	H, R
136.	IH-00099741 -00099827 (Industrial Heat IH Holdings International Ltd. February 2016 Update for Woodford Investment Management)	May offer	H, R	H, R
137.	IH-00079708 -00079713 ("Industrial Heat update 2/27/16" email)	May offer	H	H
138.	IH-00013525-00013527 (Lugano Test protocol)	Expect to offer	R, A	R, A
139.	D.P.R. del 21 dicembre 1999, n. 551	Expect to offer	A, R, I, H	A, R, I, H
140.	IH-00107115-00107116 (October 2-3, 2014 email chain involving McLaughlin, Darden, and Vaughn)	Expect to offer	H, R, A	H, R, A
141.	IH-00079737-00079746 (February 6, 2016 email from McLaughlin to Darden, with attachment)	May offer	H, R	H, R
142.	IH-00019376-00019378 (February 5, 2015 email chain involving McLaughlin, Rossi, Vaughn, and Darden)	May offer	R, H	R, H
143.	IH-00018375-00018378 (May 19, 2015 email chain involving Rossi, Norwood, Vaughn, Cassarino, and Engleman)	May offer	R, H	R, H

144.	IH-00131061-00131062 (June 3-12, 2015 email chain involving Cassarino, Vaughn, Norwood, and Engleman)	May offer	R, H	R, H
145.	Rossi_00010357 (January 31, 2015 email from Rossi to Darden informing him that since Jim Compton "is IH, therefore he can come when he want.")	May offer	R, H	R, H
146.	Rossi_00011387-11388 (Sales Contract for graphene between JMP and Leonardo Corporation.)	May offer	R	R
147.	Rossi_00011391-11465 (Leonardo Corporation's Bank United Statements)	Expect to offer	R, A	R, A
148.	Rossi_00011487-11498 (Leonardo Corporation Sunbiz documents and Articles of Merger for Leonardo of NH and Leonardo of FL)	Expect to offer		
149.	Rossi_00011499 (Check from Leonardo Corporation to Lars Tegner dated March 28, 2015)	Expect to offer	R	R
150.	Rossi_00011533 (Check from Leonardo Corp to Reactance Energy for \$4,000.00 dated March 9, 2016)	Expect to offer	R	R
151.	Rossi_00011534 (Check from Leonardo Corp to USQL for \$6,120.00 dated January 18, 2016)	Expect to offer	R	R
152.	Rossi_00011538-11569 (Leonardo Corp's Bank of America statements)	Expect to offer	R	R
153.	Rossi_00011570-11601 (Leonardo Corp's Bank of America statements)	Expect to offer	R	R
154.	Rossi_00011752 (Check from Leonardo Corp to USQL dated March 30, 2015 and check from Leonardo to H. Essen dated March 28, 2015)	Expect to offer	R	R
155.	Rossi_00011827-11831 (Articles of incorporation for Leonardo Corp of Florida)	Expect to offer	R	R
156.	Rossi_00011833 (Additional incorporation documents for Leonardo Corp of Florida)	Expect to offer	R	R
157.	Wong Dep. Ex. 1 (Wong Report)	Expect to offer		

158.	Wong Dep. Ex. 2 (Photograph of inside of Doral Facility)	Expect to offer	A	A
159.	Wong Dep. Ex. 5 (Photograph of front door of Doral Facility)	Expect to offer	A	A
160.	Wong Dep. Ex. 6 (Photograph of front door of Doral Facility)	Expect to offer	A	A
161.	Wong Dep. Ex. 7 (Photograph of ceiling inside of Doral Facility)	Expect to offer	A	A
162.	Wong Dep. Ex. 7 (Photograph of ceiling inside of Doral Facility)	Expect to offer	A	A
163.	Wong Dep. Ex. 8 (Photograph of piping inside black box)	Expect to offer	A	A
164.	Wong Dep. Ex. 9 (Photograph of piping inside of black box)	Expect to offer	A	A
165.	Wong Dep. Ex. 11 (Photograph of piping connecting 1MW Plant to black box)	Expect to offer	A	A
166.	Wong Dep. Ex. 13 (Wong's handwritten notes from deposition)	Expect to offer	A	A
167.	Stokes Dep. Ex. 5 (Feb. 15, 2016 BRC Incident Report)	May offer	R, A, H	R, A, H
168.	Stokes Dep. Ex. 7 (BRC emails attaching March 1, 2012 Incident Report)	May offer	R, A, H	R, A, H
169.	Stokes Dep. Ex. 9 (Photograph of Fulvio Fabiani)	May offer	R, A	R, A
170.	Stokes Dep. Ex. 14 (Photograph of pipe connecting 1MW Plant to black box)	Expect to offer	R, A	R, A
171.	Stokes Dep. Ex. 15 (Photograph of pipe connecting 1MW Plant to black box)	Expect to offer	R, A	R, A
172.	Stokes Dep. Ex. 18 (Photograph of piping inside of black box)	Expect to offer	R, A	R, A
173.	Stokes Dep. Ex. 22 (BRC response to records request)	May offer	R, A, H, UP	R, A, H, UP
174.	Rossi Dep. Ex. 1 (IH-00010493) (June 29, 2012 email from Rossi to Darden, Bauman and Cassarino regarding draft license agreement)	Expect to offer		

175.	Rossi Dep. Ex. 2 (IH-00010494-IH00010501) (initial draft of the license agreement, attached to email labeled IH-00010493)	Expect to offer	R	R
176.	Rossi Dep. Ex. 3 (IH-00083410-IH00083414) (email chain between Rossi, Compton, Bauman, Cassarino, and Darden)	May offer	R	R
177.	Rossi Dep. Ex. 14 (IH-00011150-IH-00011151) (June 23, 2014 email from Rossi to Darden, Mazzarino, J. Pike, D. Pike, Vaughn, Cassarino regarding customer in Florida)	Expect to offer	H	H
178.	Leonardo Dep. Ex. 2 (Rossi_00009287-Rossi_00009297) (Rossi's handwritten notes recording measurements of 1MW Plant's performance)	Expect to offer	R	R
179.	Leonardo Dep. Ex. 3 (Rossi_00001387-Rossi_00001406) (Leonardo Corporation's "Logbook of the Performance Data")	Expect to offer	R	R
180.	Leonardo Dep. Ex. 6 ("Dati assorbimento sistema MW1-USA)	Expect to offer	R	R
181.	Leonardo Dep. Ex. 8 (IH-00007019) (Feb. 10, 2015 email from Penon to Rossi and Darden attaching "report E-Cat MW1 Energy Plant in Miami: Test plan")	Expect to offer		
182.	Leonardo Dep. Ex. 9 (IH-00019103-IH00019108) (email correspondence between Penon, Rossi, Darden, Vaughn, and Dameron regarding test plan, Bureau Veritas, measurement of 1MW Plant's performance, etc.)	Expect to offer		
183.	Leonardo Dep. Ex. 12 (Photograph reflecting Rossi's identification of steam condenser line by his initials)	Expect to offer	R	R
184.	Leonardo Dep. Ex. 16 (April 23, 2013 email from Darden to Penon)	Expect to offer	R, H	R, H
185.	Leonardo Dep. Ex. 18 (Rossi_00011387-Rossi_00011390) (Leonardo/JMP Sales Contract and Leonardo/JMP Industrial Gross Sublease)	Expect to offer	R	R
186.	JMP Dep. Ex. 5 (HJ000218) (Undated letter from	Expect to	R	R



	Leonardo to JMP re service provision agreement)	offer		
187.	JMP Dep. Ex. 6 (JM000014) (Written Action of Subscriber, First Board of Directors and Stockholders of J.M. Chemical Products, Inc.)	Expect to offer	R	R
188.	JMP Dep. Ex. 9 ( Diagram of Doral Facility)	Expect to offer	R	R
189.	JMP Dep. Ex. 10 (Diagram of Doral Facility with Rossi's markings from deposition)	Expect to offer	R	R
190.	JMP Dep. Ex. 11 (Photograph of piping inside black box)	Expect to offer	R	R
191.	JMP Dep. Ex. 12 (Photograph of piping inside of black box)	Expect to offer	R	R
192.	JMP Dep. Ex. 13 (Drawing made by Rossi at deposition of bypass in piping system at Doral Facility)	Expect to offer	R	R
193.	JMP Dep. Ex. 15 (Diagram of Doral Facility with Rossi's markings from deposition)	Expect to offer	R	R
194.	JMP Dep. Ex. 16 (Photograph of piping inside of black box reflecting no bypass exists)	Expect to offer	R	R
195.	JMP Dep. Ex. 19 (JB000468) (May 23, 2016 email correspondence between Rossi and Bass)	Expect to offer	R	R
196.	JMP Dep. Ex. 20 (JB0000473) (June 17, 2016 email correspondence between Rossi and Bass)	Expect to offer	R	R
197.	JMP Dep. Ex. 21 (Photographs of windows where air was being released from Doral Facility with markings by Rossi at deposition)	Expect to offer	R	R
198.	Penon Dep. Ex. 1 (Penon CV)	May offer		
199.	Penon Dep. Ex. 2 (IH-00030719-IH-00030722) (April 19, 2013 email from Rossi to Darden, Vaughn, Mazzarino re Penon)	Expect to offer		
200.	Penon Dep. Ex. 7 (Penon 0000072) (April 26, 2013 email from Penon to Darden, Vaughn, Mazzarino, and Rossi regarding "new requirements of the test")	Expect to offer	R	R
201.	Penon Dep. Ex. 9 (Penon 0000089) (May 7, 2013	Expect to		

	email correspondence between Penon, Darden, Vaughn, Mazzarino and Rossi)	offer		
202.	AEg Dep. Ex. 15 (IH-00124079) (Rossi email stating the Second Amendment was not signed by AEG and was "cancelled")	Expect to offer		
203.	AEg Dep. Ex. 16 (AE000304.001)	Expect to offer	R, H	R, H
204.	AEg Dep. Ex. 19 (AE000006)	May offer	R, H, A	R, H, A
205.	AEg Dep. Ex. 23 (IH-00128414)	Expect to offer	R	R
206.	AEg Dep. Ex. 26 (AE000001)	May offer	R, H, A	R, H, A
207.	AEg Dep. Ex. 25 (IH-00093886)	May offer	R, H	R, H
208.	Bass Dep. Ex 1 (photo of Doral Facility)	Expect to offer	R	R
209.	Bass Dep Ex. 10 (photo of pipe connected to 1MW Plant)	Expect to offer	R	R
210.	Bass Dep. Ex. 18 (JB000440) (Steam temperature data from E-Cat)	Expect to offer	R	R
211.	Bass Dep. Ex. 2 (photo of pipes in Doral Facility)	Expect to offer	R	R
212.	Bass Dep. Ex. 3 (photo of clear box on JMP side of the Doral Facility)	Expect to offer	R	R
213.	Bass Dep. Ex. 29 (JB000385) (email regarding Bass invoices)	Expect to offer	R	R
214.	Bass Dep. Ex. 30 (JB000086) (email regarding Bass invoices)	Expect to offer	R	R
215.	Bass Dep. Ex. 30 (JB000086) (email regarding Bass invoices)	Expect to offer	R	R
216.	Bass Dep. Ex. 31 (JB000360) (email regarding Bass invoices)	Expect to offer	R	R
217.	Bass Dep. Ex. 32 (JB000349) (email regarding Bass invoices)	Expect to offer	R	R
218.	Bass Dep. Ex. 33 (JB000010) (email regarding Bass invoices)	Expect to offer	R	R

219.	Bass Dep. Ex. 34 (JB000206) (email regarding payment by JMP to Bass)	Expect to offer	R	R
220.	Bass Dep. Ex. 35 (JB000197) (email regarding Bass invoices)	Expect to offer		
221.	Fabiani Dep Ex. 1 (IH-00020852) (Fabiani's CV)	May offer		
222.	Fabiani Dep. Ex. 10 (IH-00016114) (email from Fabiani regarding sending thermal and electric data)	Expect to offer		
223.	Fabiani Dep. Ex. 2 (IH-00019367) (email regarding burnt temperature probes)	May offer		
224.	Fabiani Dep. Ex. 7 (Rossi_00008689): (email between Fabiani and Levi)	May offer	R, H	R, H
225.	Fabiani Dep. Ex. 9 (IH-00017713) (email relating to second renewal of USQL contract)	Expect to offer		
226.	Johnson Dep. Ex. 14 (HJ000001) (email from Rossi about loan to JMP to pay incoming invoices)	Expect to offer	R	R
227.	Johnson Dep. Ex. 21 (HJ000331) (email regarding invoice for nickel powder)	Expect to offer	R	R
228.	Johnson Dep. Ex. 24 (HJ000346) (email string involving Julia Annesser)	May offer	R	R
229.	Johnson Dep. Ex. 25 (HJ000306) (email regarding monthly payroll deductions)	May offer	R	R
230.	Johnson Dep. Ex 26 (HJ000218) (service provision agreement between Leonardo and JMP)	May offer	R	R
231.	Johnson Dep. Ex. 28 (HJ000067) (email looking for engineer/handyman. Rossi wants to keep a "low profile")	May offer	R, H	R, H
232.	Johnson Dep. Ex. 42 (Feb. 22, 2016 letter from Jones Day to JMP advising them that they are in default of the Term Sheet)	May offer		
233.	Johnson Dep. Ex. 43 (March 2, 2016 response letter from Johnson)	May offer		
234.	Johnson Dep. Ex. 43 (March 2, 2016 response letter from Johnson)	May offer		

235.	Johnson Dep. Ex. 45 (Response to April 11th letter)	May offer		
236.	Johnson Dep. Ex. 46 (HJ000121) (lawyer exchange regarding re-start of the plant)	May offer		
237.	Johnson Dep. Ex. 47 (HJ000055) (JMP's termination of sublease with Leonardo)	May offer	R	R
238.	Johnson Dep. Ex. 50 (IH-00089928) (OFAC compliance certification)	Expect to offer	R	R
239.	Johnson Dep. Ex. 53 (HJ000238) (email from Rossi attaching two contracts he wanted to discuss with Johnson)	May offer	R	R
240.	Johnson Dep. Ex. 6 (HJ000263) (email regarding payment to DiGiovanni)	Expect to offer	R	R
241.	IH-00005460 (November 21, 2014 emails between T. Barker Dameron and Rossi)	Expect to offer		
242.	IH-00005453 (November 21, 2014 emails between T. Barker Dameron and Rossi)	Expect to offer		
243.	IH-00005478 (November 21, 2014 emails between T. Barker Dameron and Rossi)	Expect to offer		
244.	IH-0142010-IH-0143726 (photographs taken during site inspection)	Expect to offer		
245.	Expert Report of Rick Smith	Expect to offer	H, R, A, UP, I	H, R, A, UP, I
246.	Supplemental Expert Report of Rick Smith	Expect to offer	H, R, A, UP, I	H, R, A, UP, I
247.	Exhibits and Supplemental Disclosures of J. Murray produced on January 31, 2017 and February 16, 2016	Expect to offer	H, R, A, UP, I	H, R, A, UP, I
248.	FPL Hourly Data	Expect to offer	H, R, A	H, R, A
249.	JMP000289-000299 (photographs produced by J.M. Products)	May offer		
250.	IH-00019109 (January 19, 2015 email from Rossi to Darden, Vaughn, Mazzarino, and Pike regarding J.M. Products receiving steam)	Expect to offer		

251.	IH-00011934 (July 5, 2014 email from Rossi to Darden and others regarding customer in need of steam in Florida)	Expect to offer		
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**THIRD-PARTY DEFENDANTS' COMBINED WITNESS AND EXHIBIT LIST**

Third-Party Defendants, J.M. Products, Inc., Henry Johnson, James A. Bass, Fulvio Fabiani, and United States Quantum Leap, LLC (collectively, "Third-Party Defendants"), hereby file their Combined Witness and Exhibit List.

**Witness List**

1. Henry Johnson (Expect to present)  
c/o ARAN, CORREA & GUARCH, P.A.  
2100 Salzedo Street, Suite 303  
Coral Gables, FL 33134
2. James A. Bass (Expect to present)  
c/o ARAN, CORREA & GUARCH, P.A.  
2100 Salzedo Street, Suite 303  
Coral Gables, FL 33134
3. Fulvio Fabiani (Expect to present)  
c/o Rodolfo Nuñez, P.A.  
2100 Salzedo Street, Suite 303  
Coral Gables, Florida 33134
4. Andrea Rossi (Expect to present)
5. Fabio Penon (Expect to present, may present via deposition)
6. John T. Vaughn (May present)
7. Thomas Darden (May present)
8. Barry West (May present, may present via deposition)
9. Joseph Murray (May present, may present via deposition)

10. T. Barker Dameron (May present, may present via deposition)
11. Francesco DiGiovani (May present)

**Exhibit List**

Third-Party Defendants hereby adopt Plaintiffs' Exhibit List by this reference in an effort to avoid duplicative work by the Parties. In addition, Third-Party Defendants list the following exhibits:

Exhibit Number	Description	Expect to Offer/May Offer	Plaintiffs' Objections	Defendants' Objections
1.	4th Am. AACT Ex. 17 (Term Sheet)	Expect to Offer		
2.	Cherokee Dep. Ex. 3 (IH-00082332-82349) (July 12, 2013 email chain involving J.Pike, Darden, Vaughn, P.Lamacraft and others regarding due diligence into E-Cat and Rossi)	May Offer		R H UP
3.	IH-00090966-90967 (July 4, 2014 email chain involving C.Cassarino, Darden, Vaughn, and J.Mazzarino regarding moving the plant to Florida)	May Offer		
4.	Rossi_00003235 (July 16, 2014 email involving Rossi and M.Jasztal regarding ordering product from Johnson Matthey)	May Offer		A H
5.	Rossi_00004692 (July 27, 2014 email involving Rossi and D.O'Brien regarding product from Johnson Matthey)	May Offer		H
6.	Rossi_00008685-8688 (August 1, 2014 email chain involving A.Groborz, D.O'Brien and Rossi regarding Johnson Matthey invoice)	May Offer		H
7.	Rossi_00008573-8577 (August 12, 2014 email chain involving C.Sauer, A.Groborz and Rossi regarding payment to Johnson Matthey)	May Offer		H
8.	Rossi_00004876-4877 (April 27, 2015 email chain involving Rossi, M.McGill, M.Livengood, E.Archie and M.Kneisly regarding quote for product)	May Offer		H
9.	Rossi_00001139-1145 (April 28, 2015 email involving Fabiani, M.McGill, Rossi and others attaching completed order forms)	May Offer		H
10.	USQL/Fabiani 42 (October 25, 2013 email from JT Vaughn)	Expect to Offer		R
11.	USQL/Fabiani 43 (October 24, 2013 letter from JT Vaughn re Fabiani visa application)	Expect to Offer		R
12.	USQL/Fabiani 113-116 (Email Chain involving Fabian, JT Vaughn and Trista Balmer)	Expect to Offer		R
13.	USQL/Fabiani 172 (April 15, 2015 email chain between Fabiani and Trista Balmer)	Expect to Offer		R
14.	USQL/Fabiani 175 (August 29, 2015 email chain between Fabiani and Darden)	Expect to Offer		
15.	USQL/Fabiani 178-180 (November 5-6, 2015 email chain between Fabiani and Darden)	Expect to Offer		
16.	USQL/Fabiani 181-191 (Power Absorption Measurements from February 2, 2015 through October 31, 2015)	Expect to Offer		A  H [not a business record under FRE 803(6)]

17.	USQL/Fabiani 192 (Email Chain involving Fabian, JT Vaughn and Trista Balmer)	Expect to Offer		R
18.	USQL/Fabiani 195 (USQL Invoice)	May Offer		
19.	USQL/Fabiani 196 (December 14, 2015 email from Fabiani to JT Vaughn)	Expect to Offer		R
20.	USQL/Fabiani 200 (January 28, 2016 email from Fabian re: Absorbment(sp) Data)	Expect to Offer		
21.	USQL/Fabiani 201-219 (Power Absorption Measurements from February 2, 2015 through January 1, 2016)	Expect to Offer		A  H [not a business record under FRE 803(6)]
22.	USQL/Fabiani 220-221 (January 28, 2016/December 10, 2015 emails from Fabian re: Absorbment(sp) Data)	Expect to Offer		
23.	USQL/Fabiani 222-237 (Power Absorption Measurements from February 2, 2015 through November 30, 2015)	Expect to Offer		A  H [not a business record under FRE 803(6)]
24.	USQL/Fabiani 238 (February 1, 2016 email from Fabian re: January invoice and more)	Expect to Offer		
25.	USQL/Fabiani 240 (February 23, 2016 email from Fabian re: Ecat final documentation)	Expect to Offer		
26.	USQL/Fabiani 241 (April 5, 2016 email chain)	May Offer		
27.	USQL/Fabiani 246 (April 6, 2016 email chain)	Expect to Offer		
28.	USQL/Fabiani 247 (March 1 and 18, 2016 email chain)	Expect to Offer		
29.	USQL/Fabiani 248 (April 6, 2016 email from Fabiani)	Expect to Offer		
30.	USQL/Fabiani 251-259 (Draft Technical Consulting Agreement with proposed term dates from April 2016 through April 2019)	Expect to Offer		
31.	USQL/Fabiani 262 (April 14-15, 2016 email chain between Fabiani and JT Vaughn)	Expect to Offer		
32.	USQL/Fabiani 269-270 (May 16-19, 2016 email chain)	Expect to Offer		
33.	USQL/Fabiani 618-1078 (Data provided by Fabiani)	Expect to Offer		A  H [not a business record under FRE 803(6)]
34.	USQL/Fabiani 1079-1091 (Data provided by Fabiani)	Expect to Offer		A  H [not a business record under FRE 803(6)]



35.	Raw Data Provided by Fabiani to Defendants During discovery (Not Bate Stamped)	Expect to Offer		A H [not a business record under FRE 803(6)] <sup>3</sup>
36.	Leonardo Dep. Ex. 18 (Rossi_00011387-Rossi_00011390) (Leonardo/JMP Sales Contract and Leonardo/JMP Industrial Gross Sublease)	May Offer		

### **Additional Evidence**

1. Industrial Heat, LLC Deposition Video and Transcript
2. IPH International, B.V. Deposition Video and Transcript
3. Thomas Darden Deposition Video and Transcript
4. John T. Vaughn Deposition Video and Transcript
5. Barry West Deposition Video and Transcript
6. Joseph Murray Deposition Video and Transcript
7. T. Barker Dameron Deposition Video and Transcript
8. Fabio Penon Deposition Video and Transcript
9. Andrea Rossi Deposition Video and Transcript
10. Leonardo Deposition Video and Transcript
11. Fulvio Fabiani Deposition Video and Transcript
12. Henry Johnson Deposition Video and Transcript
13. James A. Bass Deposition Video and Transcript
14. J.M. Products, Inc. Deposition Video and Transcript

### **Reservation of Rights**

Third-Party Defendants reserve the right to present evidence listed in Defendants' Exhibit List.

Third-Party Defendants are still reviewing the documents produced throughout discovery; accordingly,

Third-Party Defendants reserve the right to supplement their exhibit list.

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<sup>3</sup> \*Defendants assume this exhibit refers to the electrical and thermal data produced by Fabiani and USQL to Defendants on January 13, 2017. If this exhibit does not refer to such data, then Defendants object on the basis that they do not know what documents are being referenced.

Dated: May 5, 2017.

Respectfully submitted,

/s/ John W. Annesser

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Telephone: 305 283-9898

*Attorneys for Plaintiffs, Andrea Rossi and  
Leonardo Corporation*

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, that a true and correct copy of the foregoing was served by in the manner specified below on May 5, 2017 on all counsel or parties of record on the attached Service List.

/s/ John W. Annesser

John W. Annesser, Esq. (FBN 98233)

**SERVICE LIST**

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- and -

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*Attorneys for Defendants, Darden, Vaughn, Industrial Heat, LLC,  
IPH Int'l B.V., and Cherokee Investment Partners, LLC*

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