

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

ANDREA ROSSI and LEONARDO
CORPORATION,

Plaintiffs,

v.

THOMAS DARDEN; JOHN T. VAUGHN;
INDUSTRIAL HEAT, LLC; IPH
INTERNATIONAL B.V.; and
CHEROKEE INVESTMENT PARTNERS,
LLC,

Defendants.

CASE NO. 1:16-cv-21199-CMA

INDUSTRIAL HEAT, LLC and IPH
INTERNATIONAL B.V.,

Counter-Plaintiffs,

v.

ANDREA ROSSI and LEONARDO
CORPORATION,

Counter-Defendants,

and

J.M. PRODUCTS, INC.; HENRY
JOHNSON; UNITED STATES
QUANTUM LEAP, LLC; FULVIO
FABIANI; and JAMES A. BASS,

Third-Party Defendants.

STIPULATION OF DISMISSAL

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Andrea Rossi, Leonardo Corporation, Industrial Heat, LLC, IPH International B.V., Cherokee Investment Partners, LLC, Thomas Darden, John T. Vaughn, J.M. Products, Inc., Henry Johnson, United States Quantum Leap, LLC, Fulvio Fabiani, and James Bass hereby stipulate to the dismissal with prejudice of all claims, counterclaims and third-party claims asserted in the above-captioned action, as so acknowledged by the parties in open court on July 5, 2017, and as so ordered by the Court on July 6, 2017 [D.E. 333].

Dated: July 19, 2017

Respectfully submitted,

/s/ Christopher R.J. Pace

Christopher R.J. Pace (FBN 721166)

cpace@jonesday.com

Christopher M. Lomax (FBN 56220)

clomax@jonesday.com

Erika S. Handelson (FBN 91133)

ehandelson@jonesday.com

JONES DAY

Brickell World Plaza

600 Brickell Avenue, Suite 3300

Miami, FL 33131

Tel: 305-714-9700

Fax: 305-714-9799

Bernard P. Bell (*admitted pro hac vice*)

Miller Friel, PLLC

1200 New Hampshire Ave., NW, Suite 800

Washington, D.C. 20036

Tel.: 202-760-3158

Fax: 202-459-9537

Email: bellb@millerfriel.com

Counsel for Defendants/Counter-Plaintiffs

/s/ Brian W. Chaiken

Brian W. Chaiken, Esq. (FBN 118060)

bchaiken@aclaw-firm.com

John W. Annesser, Esq. (FBN 98233)

janness@aclaw-firm.com

ANNESSE & CHAIKEN, PLLC
2525 Ponce De Leon Blvd., Suite 625
Coral Gables, FL 33134
Tel: 786-600-7446
Fax: 786-607-3022

John C. Lukacs, Sr. (FBN 362767)
jlukacs@hinshawlaw.com
2525 Ponce de Leon Blvd., 4th Floor
Coral Gables, FL 33134
Tel: 305-428-5117
Fax: 305-577-1063

Counsel for Plaintiffs/Counter-Defendants

/s/ Francisco J. León de la Barra
Francisco J. León de la Barra, Esq. (FBN 105327)
Fernando S. Arán, Esq. (FBN 349712)
Arán Correa & Guarch, P.A.
2100 Salzedo St, Suite 303
Coral Gables, Florida 33134
Tel: 305-665-3400
Fax: 305-665-2250

Counsel for J.M. Products, Johnson, and Bass

/s/ Rodolfo Nunez
Rodolfo Nunez, Esq. (FBN 16950)
225 University Drive
Coral Gables, Florida 33143
Tel: 305-443-2440
Fax: 305-443-2334
rnunez@acg-law.com

Counsel for Fabiani and USQL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 19, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel or parties of record.

/s/ Christopher R.J. Pace

Christopher R.J. Pace