

EXHIBIT 11

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

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; FABIO PENON; UNITED)
STATES QUANTUM LEAP, LLC;)
FULVIO FABIANI; and JAMES BASS,)

Third-Party Defendants.)

**DEFENDANT IPH INTERNATIONAL, B.V.'S RESPONSES AND OBJECTIONS TO
PLAINTIFF ANDREA ROSSI'S FIRST SET OF INTERROGATORIES**

Defendant IPH International, B.V. ("IPH") pursuant to Federal Rules of Civil Procedure ("Federal Rules") 26 and 33, hereby responds to Plaintiff Andrea Rossi's ("Rossi") First Set of Interrogatories ("Interrogatories").

PRELIMINARY STATEMENT

IPH provides these responses and objections ("Responses") without waiving any objections as to the admissibility in evidence of these Responses, the information produced pursuant to, or referenced in, these Responses, or the subject matter of the Interrogatories or of the information produced pursuant to, or referenced in, these Responses. The Responses are also subject to and without waiver of IPH's rights: (i) to object to other discovery directed to the subject matter of the Interrogatories or Responses; (ii) to make additional objections or to seek protective orders; and (iii) to revise, correct, add to, or clarify the Responses or information referred to below in accordance with all applicable rules. IPH reserves the right to supplement these Responses after it has had a full and fair opportunity to participate in discovery.

IPH has not completed investigation of the facts related to this case. Therefore, IPH responds to these Interrogatories based upon information and documents acquired and reviewed to date, which may or may not be inclusive of all documents relevant to the matters in dispute in this case. Accordingly, the present Responses are offered without prejudice to supplementation or modification at a later date.

INTERROGATORY RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1: Identify each and every person assisting in the preparation of, or supplying information for, your answers to these Interrogatories, and for each such person, identify by number each such Interrogatory for which such person supplied information for or assisted in the preparation of.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, protection or restriction upon discovery (“Applicable Privilege or Protection”). Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory to the extent it seeks information on which legal counsel for IPH assisted in preparing the responses below and as to which Interrogatory a particular counsel provided assistance.

Subject to, and without waiving, the foregoing objections, the following people – excluding legal counsel for IPH – assisted in the preparation of or supplying information for these Responses:

- i. Dewey Weaver, managing partner of Deep River Ventures, LLC, a consultant for Industrial Heat, supplied information for the responses to Interrogatory Nos. 2, 3, 4 and 5.
- ii. John T. Vaughn, Vice President of Industrial Heat, supplied information for the response to Interrogatory No. 3.
- iii. No one other than counsel supplied information for Interrogatory Nos. 6 and 7.

INTERROGATORY NO. 2: Please identify to whom Leonardo and Rossi “have been open in broadcasting that they are engaged in designing and developing what are classified as ‘E-Cat Products’ under the License Agreement,” as alleged in paragraph 22 of your counterclaims, including when and where the broadcasts were made.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is

unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory on the grounds that it is unduly burdensome. Most, if not all, of Leonardo and Rossi’s broadcasting of information has occurred through postings on the internet, including on Rossi’s blog, Journal of Nuclear Physics (“JONP”). JONP receives a sizable number of site visits per day from individuals in the United States and abroad. It is impossible for IPH to identify every individual viewing the JONP website, and therefore, impossible to identify each and every person to whom broadcasts were made. Additionally, to the extent that Rossi broadcasts information on the internet through the use of online aliases, IPH is not able to identify each and every broadcast made by Rossi and/or Leonardo over the years.

Subject to and without waiving the foregoing objections, IPH states that Leonardo and Rossi “have been open in broadcasting that they are engaged in designing and developing what are classified as ‘E-Cat Products’ under the License Agreement” to any and all persons viewing the JONP website or other websites on which Rossi has posted such information, including but not limited to, on the following occasions:

- i. February 9, 2016 through a posting on JONP.
- ii. February 11, 2016 through a posting on JONP.

- iii. February 13, 2016 through a posting on JONP.
- iv. February 18, 2016 through a posting on JONP.
- v. February 20, 2016 through a posting on JONP.
- vi. February 21, 2016 through a posting on JONP.
- vii. February 22, 2016 through a posting on JONP.
- viii. March 25, 2016 though a posting on JONP.
- ix. March 30, 2016 through a posting on JONP.
- x. July 23, 2016 through a posting on JONP.

IPH will also produce a copy of the JONP that Plaintiffs can search as readily as IPH for additional examples.

INTERROGATORY NO. 3: Please identify to whom Leonardo and Rossi “have...been open that they are [engaged in designing and developing what are classified as ‘E-Cat Products’ under the License Agreement] in combination with a company or companies unaffiliated with IPH,” as alleged in paragraph 122 of your counterclaims, including the names of the companies.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory on the grounds that it is duplicative of interrogatory no. 2.

6. IPH objects to this interrogatory on the grounds that it is unduly burdensome. Most, if not all, of Leonardo and Rossi’s broadcasting of information has occurred through postings on the internet, including on Rossi’s blog, Journal of Nuclear Physics (“JONP”). JONP receives a sizable number of site visits per day from individuals in the United States and abroad. It is impossible for IPH to identify every individual viewing the JONP website, and therefore, impossible to identify each and every person to whom broadcasts were made. Additionally, to the extent that Rossi broadcasts information on the internet through the use of online aliases, IPH is not able to identify each and every broadcast made by Rossi and/or Leonardo over the years.

Subject to and without waiving the foregoing objections, IPH states that Leonardo and Rossi “have...been open that they are [engaged in designing and developing what are classified as ‘E-Cat Products’ under the License Agreement] in combination with a company or companies unaffiliated with IPH,” to any and all persons viewing the JONP website or other websites on which Rossi has posted such information. Rossi has admitted through various blog postings, that such design and development efforts have been with persons or entities other than IPH and

Industrial Heat, but Rossi has refused to identify his new partner(s). For example, Rossi has stated:

- i. “What I know is that Leonardo Corporation is working with different Teams on all the issues with my direction.” JONP, April 6, 2016.
- ii. “In June we will have a very important test with a very important Customer.” JONP, April 27, 2016.
- iii. That the “very important customer” is a “new one”, not the customer that has already ordered the three E-Cat plants he already announced. JONP, April 27, 2016.
- iv. “When I say ‘Partner’ I mean also our new allies with which we are preparing the massive production of the product.” JONP, May 7, 2016.
- v. That his “new partner” is working with him these days on the E-Cat QuarkX. JONP, June 23, 2016
- vi. That “the Partner” reacted positively to a test of the QuarkX. JONP, June 26, 2016.
- vii. That his “new partner” is not at the same time a customer who ordered one or more of Leonardo’s plants. JONP, July 1, 2016.
- viii. That there will be other industrial E-Cats in operation for his customers. JONP, July 2, 2016.

Leonardo and Rossi also have claimed to be engaged in design and development activities with Hydro Fusion, Ltd. and ABB Group. *See, e.g.*, Dep. Tr. of Leonardo Corporation, at 232:4-5; JONP 11/15/16, 10/6/16, 10/2/16, 7/23/16, 7/16/16, 6/4/16, 8/8/16, 7/24/16, 6/14/16.

IPH will also produce a copy of the JONP that Plaintiffs can search as readily for “Hydro Fusion” and “ABB” as IPH for additional examples.

INTERROGATORY NO. 4: Please describe all facts upon which you base your claims that Plaintiffs violated the non-compete provision under the License Agreement, as alleged in paragraphs 121-125 of your counterclaims, including with whom Plaintiffs engaged in competition.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory on the grounds that it is duplicative of interrogatories no. 2 and 3.

Subject to and without waiving the foregoing objections, IPH states that Plaintiffs violated the non-compete provision under the License Agreement by engaging in the design, development, manufacture, distribution, lease, rental and/or sale of E-Cat Products without the prior written consent of Industrial Heat or IPH. By Rossi's own admissions, as detailed in his postings on JONP, Rossi and Leonardo have been working with new partner(s) and/or customer(s) to design, develop, manufacture, distribute and/or sell E-Cat Products.

INTERROGATORY NO. 5: To the extent that you claim that "Leonardo, without prior written consent from IPH, abandoned several patent applications," as alleged in paragraph 118 of your counterclaims, please identify the patent application number and filing date for each abandoned patent.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of "you", "yours" and "yourselves" to the extent it includes persons or entities "purporting to act," but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies,

but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory on the grounds that it is unduly burdensome. Rossi and/or Leonardo frequently filed provisional patent applications and then allowed the applications to lapse, never converting them into non-provisional applications. Once the provisional applications are deemed abandoned it is not possible to obtain the application numbers and filing information from the USPTO. Additionally, because patent applications are confidential, it is impossible for IPH to know all of the patent applications filed by Rossi and/or Leonardo.

Subject to and without waiving the foregoing objections, IPH states Exhibit A hereto is a non-exhaustive list of patent applications that Rossi and/or Leonardo abandoned without complying with section 7.2 of the License Agreement.

INTERROGATORY NO. 6: To the extent that you claim that “Leonardo filed patent applications relating to the Licensed Patents without informing IPH,” as alleged in paragraph 117 of your counterclaims, please identify the patent application number and filing date of the patent application applied for.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is

unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

5. IPH objects to this interrogatory on the grounds that it is unduly burdensome. Rossi and/or Leonardo frequently filed provisional patent applications and then allowed the applications to lapse, never converting them into non-provisional applications. Once the provisional applications are deemed abandoned it is not possible to obtain the application numbers and filing information from the USPTO. Additionally, because patent applications are confidential, it is impossible for IPH to know all of the patent applications filed by Rossi and/or Leonardo.

Subject to and without waiving the foregoing objections, IPH states that Exhibit B hereto is a non-exhaustive list of patent applications Rossi and/or Leonardo filed without currently informing IPH or Industrial Heat.

INTERROGATORY NO. 7: With respect to your claim that “IPH has been harmed...as a result of Leonardo’s improper handling of patent applications,” as alleged in paragraph 120 of your counterclaims, please describe the specific harms alleged (sic) caused and quantify the specific dollar amount corresponding to each respective claim.

ANSWER: IPH objects to this interrogatory on the following grounds:

1. IPH objects to the Definitions, Instructions and Interrogatories to the extent they seek the disclosure information protected by an Applicable Privilege or Protection. Inadvertent

disclosure of any privileged or protected information or documents in response to this interrogatory shall not be deemed a waiver of the Applicable Privilege or Protection.

2. IPH will respond to the Interrogatories according to its understanding of the ordinary meaning of any vague, ambiguous or undefined words or phrases contained therein.

3. There are defined terms and phrases in the definitions section of the Interrogatories that are not used in any of the specific interrogatories. As a result, it is unnecessary for IPH to object to such unnecessary definitions but does not thereby waive any objections to those definitions as used in any subsequent discovery request.

4. IPH objects to the definition of “you”, “yours” and “yourselves” to the extent it includes persons or entities “purporting to act,” but not in fact acting, on behalf of IPH because Rossi has provided no basis for the identification of such persons or entities and further because such persons or entities are not, by definition, acting on behalf of the above identified companies, but only purporting to do so. However, these Responses include persons or entities IPH knows are acting or purporting to act on its behalf.

Subject to and without waiving the foregoing objections, IPH states that it has paid or had paid on its behalf fees and expenses charged by Leonardo and/or Rossi for preparing, filing or prosecuting patent applications that should have been borne by Leonardo, and IPH has disclosed in discovery spreadsheets and invoices reflecting those payments. *See, e.g.* IH-00131929; IH-00014673; IH-00003745; IH-00013195; IH-00092023; IH-00011989.

Dated: February 27, 2017.

Respectfully submitted,

/s/ Christopher R.J. Pace

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail on counsel of record on the service list below this 27th day of February, 2017.

/s/ Erika S. Handelson

Erika S. Handelson

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VERIFICATION

I, John T. Vaughn, have been appointed an authorized agent of IPH International, B.V. ("IPH") for the purpose of responding to Andrea Ross's First Set of Interrogatories to IPH. I am authorized by IPH to verify on its behalf the Responses and Objections to Rossi's First Set of Interrogatories ("Responses"). I have read the Responses and know the contents thereof. I state that the facts contained in the Responses are true and correct to the best of my knowledge, information and belief, subject to the objections set forth in the Responses. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON 2/27, 2017

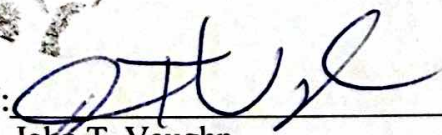
BY: 
John T. Vaughn

EXHIBIT A

Application No.	Filing Date	Title
12/736,193	September 16, 2010	Method and Apparatus for Carrying Out Nickel and Hydrogen Exothermal Reaction
61/626,287	September 26, 2011	High Efficiency Heat Generator
61/629,960	December 2, 2011	High Efficiency Heat Generator of Second Generation
61/744,570	October 1, 2012	High Efficiency Heat Generator with Rossi-Effect
61/795,938	October 31, 2012	Process and Apparatus to Make Heat at High Temperature with Reactions between Metals and Hydrogen
61/796,007	November 1, 2012	Control System for a Thermal Power Assembly Made by More Modules
61/796,008	November 1, 2012	High Efficiency Thermal Power Generator System
61/848,143	December 22, 2012	New Theory Regarding Reactions between Nickel, Lithium, Hydrogen: Weak Interaction Energy
61/855,456	May 16, 2013	System of Activator and Reactor to Improve the cop of LENR Reactors
61/957,873	July 15, 2013	Direct Conversion of Photons into Electric Energy During a LEHR Process
61/958,962	August 12, 2013	Additive for Exothermic Reactions
61/960,510	September 20, 2013	System to Increase Pressure
61/960,810	September 27, 2013	Irradiation System to Increase the Rossi-Effect
Unknown	October 1, 2013 (mailing date)	Enrichment of 62 and 64 Ni Isotoped Process and Apparatus

Application No.	Filing Date	Title
61/961,286	October 10, 2013	White Dwarf Derived Theory, Process, Apparatus
Unknown	October 15, 2013 (mailing date)	Particular Application with Fast Reactions of the Rossi-Effect
61/961,813	October 24, 2013	Particular Resistive Electric Heater
61,961,814	October 24, 2013	Gas Operated Energy Catalyzer
61/961,864	October 25, 2013	High Efficiency Thermal Power Generator System
Unknown	October 26, 2013 (mailing date)	Process and Apparatus to Make Heat at High Temperature with Metals and Hydrogen
61/961, 994	October 29, 2013	Vacuum Enhanced Reactor
61/962,001	October 29, 2013	X Rays Transparent Reactor
Unknown	November 5, 2013 (mailing date)	Direct Conversion of Photons into Electric Energy
61/962,366	November 6, 2013	Gas Operated Energy Catalyzer
Unknown	November 10, 2013 (mailing date)	High Efficiency Heat Generator with Rossi-Effect
61/962,530	November 12, 2013	Control System for a Thermal Power Assembly Blade by More Modules
61/963,594	December 9, 2013	Particular Induction Electric Heater
Unknown	December 20, 2013 (mailing date)	New Theory regarding Reactions between Nickel, Lithium, Hydrogen: Weak Interaction Energy and in a Mirror Effect Reactor
Unknown	January 27, 2014 (mailing date)	Electric Oven with Radiating External Wall

Application No.	Filing Date	Title
61/967,660	March 24, 2014	3D Printing Production System for Energy Catalyzers
61/967,664	March 24, 2014	X-Ray Transparent Reactor and its Application in a Jet Engine
61/967,781	March 27, 2014	High Pressure Electric Heater with Heat Exchanger
61,967,784	March 27, 2014	Resistive Electric Heater Made Only by Resistive Ceramics
Unknown	April 18, 2014 (mailing date)	High Power Density Energy Catalyzer
61/996,282	May 5, 2014	System of Activator and Reactor to Improve COP of LENR Reactors
61/996,415	May 8, 2014	Gas Energy Catalyzer with Ceramic Honeycat
61/996,731	May 15, 2014	System to Avoid Catastrophic Effect on Energy Catalyzers
61/997,244	May 27, 2014	System to Avoid Biased Reactions in an Energy Catalyzer
Unknown	June 4, 2014 (mailing date)	Particular Integration of Solar Energy with Energy Catalyzers
62/071,455	September 25, 2014	Nuclear mechanism underlying the "rossi effect"
62/071,456	September 25, 2014	Irradiation system to increase the Rossi effect
62/071,603	September 29, 2014	Lithium and nickel isotopes enrichment systems
62/122,050	October 10, 2014	White dwarf derived theory, process, and apparatus
62/122,154	October 14, 2014	Apparatus to produce heat with nickel and lithium
Unknown	October 15, 2014 (mailing date)	Particular Application with Fast Reactions of the Rossi Effect

Application No.	Filing Date	Title
62/123,147	November 10, 2014	X Rays Transparent Reactor with 1 HEV Excitation
Unknown	October 21, 2014	Gas Operated Energy Catalyzer
62/122,832	October 23, 2014	High Efficiency Thermal Power Generator System
Unknown	October 26, 2014	Process and Apparatus to Make Heat at High Temperature with Metals and Hydrogen
Unknown	October 27, 2014	Particular Resistive Electric Heater
Unknown	October 27, 2014	Vacuum Enhanced Reactor
Unknown	November 1, 2014	Enrichment of 62 and 64 Ni Isotopes Apparatus and Process
62/123,196	November 10, 2014	Gas Operated Energy Catalyzer
62/123,057	November 6, 2014	Direct Converter of Photons into Electric Energy
62/123,195	November 10, 2014	Control System for a Thermal Power Assembly Made by More Modules
62/122,978	November 4, 2014	High Efficiency Heat Generator with Rossi-Effect
62/123,396	November 17, 2014	Resistive Electric Heater Made Conductive Ceramics Activated by a Resistance and a High Voltage Generator
62/124,111	December 9, 2014	Particular resistive electric heater
62/124,112	December 9, 2014	Electric heater with direct electricity injection
62/124,113	December 9, 2014	Particular induction electric heater

Application No.	Filing Date	Title
62/124,114	December 9, 2014	Theory regarding reaction between nickel, lithium, hydrogen weak interaction energy and in a mirror effect reactor
62/124,306	December 15, 2014	Voltage driven heater
62/124,802	January 5, 2015	Small dimensions energy catalyzer by rossi effect
62/124,803	January 5, 2015	Electric oven with radiating external wall
62/176,113	February 10, 2015	Hydryde molecule
62/176,114	February 10, 2015	Intertwined metal wire to increase the amperage of electric heaters
62/176,213	February 13, 2015	Nuclear structure theory for the energy catalyzer (E-Cat)
62/176,221	February 13, 2015	White dwarf derived pressure system combined with casimir effect and van der waals forces
Unknown	February 23, 2015	New Hydride Molecule
Unknown	February 24, 2015	Intertwined Metal Wire to Increase the Amperage of Electric Heaters
Unknown	February 24, 2015	White Dwarf Derived Pressure System Combined with Casimir Effect and Van der Waals Forces
62/177,710	March 23, 2015	3D Printing Production System for Energy Catalyzers
62/177,708	March 23, 2015	X-Rays Transparent Reactor and its Application in a Jet Engine
62/177,707	March 23, 2015	High Pressure Electric Heater with Heat Exchanger
Unknown	March 23, 2015	High Pressure Electric Heater with High Voltage Regulation and Heat Exchanger

Application No.	Filing Date	Title
Unknown	March 23, 2015	Resistive Electric Heater Made only by Resistive Ceramics
62/178,261	April 6, 2015	Resistive Electric Heater Made only by Conductive Ceramics
62/178,270	April 6, 2015	High Power Density Energy Catalyzer
62/179,160	April 30, 2015	High pressure electric heater with high voltage regulation + heat exchanger
Unknown	May 5, 2015	System of activator and reactor to improve the COP of LEHR reactors
Unknown	May 5, 2105	GA energy catalyzer with ceramic honeycat
62/230,745	June 15, 2015	Particular integration of solar energy with energy catalyzers
62/230,746	June 15, 2015	System to avoid biased reactions in an energy catalyzer
62/230,747	June 15, 2015	System to avoid catastrophic effect on energy catalyzers
62/231,078	June 25, 2015	Reverse Mossbauer Effect Electricity and Heat Generator
Unknown	July 5, 2015	Additive for Esothermic Reactions with Hydrides, Hydrogen, Deuterium and Nickel, in particular, LiARH4
62/231,454	July 6, 2015	New System Press for Nickel and Lithium Powders or Grains
62/231,457	July 7, 2015	Direct Conversion of Photons into Electrical Energy during a LEHR Process with a Gold Lined Reactor
62/231,456	July 7, 2015	Apparatus to Produce Anomalous Amount of Energy
62/231,455	July 7, 2015	Rossi Effect and apparatus to produce heat with high efficiency

Application No.	Filing Date	Title
62/231,671	July 11, 2015	Triangular and Flat Resistances Electric Heater
62/283,100	August 21, 2015	Lithium depletion process and apparatus
62/283,283	August 27, 2015	Transformer for very high voltages
62/283,635	September 8, 2015	System to increase pressure
62/283,640	September 8, 2015	Lithium and nickel isotopes enrichment systems
62/283,634	September 8, 2015	The nuclear mechanism underlying the "rossi effect"
Unknown	September 23, 2015	Irradiation system to increase the rossi-effect and produce direct current
62/284,645	October 6, 2015	White dwarf derived theory, process, apparatus and its applications
62/284,644	October 6, 2015	Gas operated energy catalyzer
Unknown	October 23, 2015	High efficiency thermal power generation system
Unknown	October 26, 2015	Process and apparatus to make heat at high temperature with metals and hydrogen
62/284,647	October 6, 2015	Particular resistive electric heater
62/284,646	October 27, 2015	Vacuum enhanced reactor
Unknown	October 21, 2015	X-rays transparent reactor with 1 MEV excitation
Unknown	November 1, 2015	Enrichment of 62 and 64 Ni isotopes apparatus and process
Unknown	November 1, 2015	Gas operated energy catalyzer

Application No.	Filing Date	Title
Unknown	November 5, 2015	Direct converter of photons into electric energy
Unknown	November 10, 2015	High efficiency heat generator with Rossi-effect
62/386,560	December 7, 2015	Particular induction electric heater
Unknown	December 5, 2015	New theory regarding reaction between nickel, lithium, hydrogen weak interaction energy and in a mirror effect reactor
Unknown	December 5, 2015	Resistive electric heater made conductive ceramics activated by a resistance and a high voltage generator able to be used as a jet engine
62/386,609	December 7, 2015	Electric heater with direct electricity injection
62/386,562	December 7, 2015	Voltage driven heater
62/285,684	November 6, 2015	Particular application with fast reactions of the Rossi effect
Unknown	December 3, 2015	Nickel graphite catalizer
62/386,569	December 7, 2015	Unknown
62/387,940	January 12, 2016	Particular resistive electric heater
Unknown	January 13, 2016	Electric oven with radiation external wall
Unknown	January 13, 2016	Small dimensions energy catalyzer by Rossi effect
62/388,774	February 8, 2016	White dwarf derived pressure system combined with casimer effect and van der waals forces
62/388,777	February 8, 2016	Intertwined metal wire to increase the amperage of electric heaters

Application No.	Filing Date	Title
62/388,776	February 8, 2016	Nuclear structure theory for the energy catalyzer (E-cat)
Unknown	February 2, 2016	New hydride molecule
Unknown	February 5, 2016	Generator of light, electricity and heat
Unknown	February 11, 2016	Fluid heater at high voltage

EXHIBIT B

Application No.	Filing Date	Title
61/795,938	October 31, 2012	Process and Apparatus to Make Heat at High Temperature with Reactions between Metals and Hydrogen
61/796,007	November 1, 2012	Control System for a Thermal Power Assembly Made by More Modules
61/796,008	November 1, 2012	High Efficiency Thermal Power Generator System
61/848,143	December 22, 2012	New Theory Regarding Reactions between Nickel, Lithium, Hydrogen: Weak Interaction Energy
61/855,456	May 16, 2013	System of Activator and Reactor to Improve the cop of LENR Reactors
61/957,873	July 15, 2013	Direct Conversion of Photons into Electric Energy During a LEHR Process
61/958,962	August 12, 2013	Additive for Exothermic Reactions
61/960,510	September 20, 2013	System to Increase Pressure
61/960,810	September 27, 2013	Irradiation System to Increase the Rossi-Effect
Unknown	October 1, 2013 (mailing date)	Enrichment of 62 and 64 Ni Isotoped Process and Apparatus
61/961,286	October 10, 2013	White Dwarf Derived Theory, Process, Apparatus
Unknown	October 15, 2013 (mailing date)	Particular Application with Fast Reactions of the Rossi-Effect
61/961,813	October 24, 2013	Particular Resistive Electric Heater
61,961,814	October 24, 2013	Gas Operated Energy Catalyzer

Application No.	Filing Date	Title
61/961,864	October 25, 2013	High Efficiency Thermal Power Generator System
Unknown	October 26, 2013 (mailing date)	Process and Apparatus to Make Heat at High Temperature with Metals and Hydrogen
61/961, 994	October 29, 2013	Vacuum Enhanced Reactor
61/962,001	October 29, 2013	X Rays Transparent Reactor
Unknown	November 5, 2013 (mailing date)	Direct Conversion of Photons into Electric Energy
61/962,366	November 6, 2013	Gas Operated Energy Catalyzer
Unknown	November 10, 2013 (mailing date)	High Efficiency Heat Generator with Rossi-Effect
61/962,530	November 12, 2013	Control System for a Thermal Power Assembly Blade by More Modules
61/963,594	December 9, 2013	Particular Induction Electric Heater
Unknown	December 20, 2013 (mailing date)	New Theory regarding Reactions between Nickel, Lithium, Hydrogen: Weak Interaction Energy and in a Mirror Effect Reactor
Unknown	January 27, 2014 (mailing date)	Electric Oven with Radiating External Wall
61/967,660	March 24, 2014	3D Printing Production System for Energy Catalyzers
61/967,664	March 24, 2014	X-Ray Transparent Reactor and its Application in a Jet Engine
61/967,781	March 27, 2014	High Pressure Electric Heater with Heat Exchanger
61,967,784	March 27, 2014	Resistive Electric Heater Made Only by Resistive Ceramics

Application No.	Filing Date	Title
Unknown	April 18, 2014 (mailing date)	High Power Density Energy Catalyzer
61/996,282	May 5, 2014	System of Activator and Reactor to Improve COP of LENR Reactors
61/996,415	May 8, 2014	Gas Energy Catalyzer with Ceramic Honeycat
61/996,731	May 15, 2014	System to Avoid Catastrophic Effect on Energy Catalyzers
61/997,244	May 27, 2014	System to Avoid Biased Reactions in an Energy Catalyzer
Unknown	June 4, 2014 (mailing date)	Particular Integration of Solar Energy with Energy Catalyzers
62/071,455	September 25, 2014	Nuclear mechanism underlying the "rossi effect"
62/071,456	September 25, 2014	Irradiation system to increase the Rossi effect
62/071,603	September 29, 2014	Lithium and nickel isotopes enrichment systems
62/122,050	October 10, 2014	White dwarf derived theory, process, and apparatus
62/122,154	October 14, 2014	Apparatus to produce heat with nickel and lithium
Unknown	October 15, 2014 (mailing date)	Particular Application with Fast Reactions of the Rossi Effect
62/123,147	November 10, 2014	X Rays Transparent Reactor with 1 HEV Excitation
Unknown	October 21, 2014	Gas Operated Energy Catalyzer
62/122,832	October 23, 2014	High Efficiency Thermal Power Generator System
Unknown	October 26, 2014	Process and Apparatus to Make Heat at High Temperature with Metals and Hydrogen

Application No.	Filing Date	Title
Unknown	October 27, 2014	Particular Resistive Electric Heater
Unknown	October 27, 2014	Vacuum Enhanced Reactor
Unknown	November 1, 2014	Enrichment of 62 and 64 Ni Isotopes Apparatus and Process
62/123,196	November 10, 2014	Gas Operated Energy Catalyzer
62/123,057	November 6, 2014	Direct Converter of Photons into Electric Energy
62/123,195	November 10, 2014	Control System for a Thermal Power Assembly Made by More Modules
62/122,978	November 4, 2014	High Efficiency Heat Generator with Rossi-Effect
62/123,396	November 17, 2014	Resistive Electric Heater Made Conductive Ceramics Activated by a Resistance and a High Voltage Generator
62/124,111	December 9, 2014	Particular resistive electric heater
62/124,112	December 9, 2014	Electric heater with direct electricity injection
62/124,113	December 9, 2014	Particular induction electric heater
62/124,114	December 9, 2014	Theory regarding reaction between nickel, lithium, hydrogen weak interaction energy and in a mirror effect reactor
62/124,306	December 15, 2014	Voltage driven heater
62/124,802	January 5, 2015	Small dimensions energy catalyzer by rossi effect
62/124,803	January 5, 2015	Electric oven with radiating external wall

Application No.	Filing Date	Title
62/176,113	February 10, 2015	Hydryde molecule
62/176,114	February 10, 2015	Intertwined metal wire to increase the amperage of electric heaters
62/176,213	February 13, 2015	Nuclear structure theory for the energy catalyzer (E-Cat)
62/176,221	February 13, 2015	White dwarf derived pressure system combined with casimir effect and van der waals forces
Unknown	February 23, 2015	New Hydride Molecule
Unknown	February 24, 2015	Intertwined Metal Wire to Increase the Amperage of Electric Heaters
Unknown	February 24, 2015	White Dwarf Derived Pressure System Combined with Casimir Effect and Van der Waals Forces
62/177,710	March 23, 2015	3D Printing Production System for Energy Catalyzers
62/177,708	March 23, 2015	X-Rays Transparent Reactor and its Application in a Jet Engine
62/177,707	March 23, 2015	High Pressure Electric Heater with Heat Exchanger
Unknown	March 23, 2015	High Pressure Electric Heater with High Voltage Regulation and Heat Exchanger
Unknown	March 23, 2015	Resistive Electric Heater Made only by Resistive Ceramics
62/178,261	April 6, 2015	Resistive Electric Heater Made only by Conductive Ceramics
62/178,270	April 6, 2015	High Power Density Energy Catalyzer
62/179,160	April 30, 2015	High pressure electric heater with high voltage regulation + heat exchanger

Application No.	Filing Date	Title
Unknown	May 5, 2015	System of activator and reactor to improve the COP of LEHR reactors
Unknown	May 5, 2105	GA energy catalyzer with ceramic honeycat
62/230,745	June 15, 2015	Particular integration of solar energy with energy catalyzers
62/230,746	June 15, 2015	System to avoid biased reactions in an energy catalyzer
62/230,747	June 15, 2015	System to avoid catastrophic effect on energy catalyzers
62/231,078	June 25, 2015	Reverse Mossbauer Effect Electricity and Heat Generator
Unknown	July 5, 2015	Additive for Esothermic Reactions with Hydrides, Hydrogen, Deuterium and Nickel, in particular, LiARH4
62/231,454	July 6, 2015	New System Press for Nickel and Lithium Powders or Grains
62/231,457	July 7, 2015	Direct Conversion of Photons into Electrical Energy during a LEHR Process with a Gold Lined Reactor
62/231,456	July 7, 2015	Apparatus to Produce Anomalous Amount of Energy
62/231,455	July 7, 2015	Rossi Effect and apparatus to produce heat with high efficiency
62/231,671	July 11, 2015	Triangular and Flat Resistances Electric Heater
62/283,100	August 21, 2015	Lithium depletion process and apparatus
62/283,283	August 27, 2015	Transformer for very high voltages
62/283,635	September 8, 2015	System to increase pressure

Application No.	Filing Date	Title
62/283,640	September 8, 2015	Lithium and nickel isotopes enrichment systems
62/283,634	September 8, 2015	The nuclear mechanism underlying the "rossi effect"
Unknown	September 23, 2015	Irradiation system to increase the rossi-effect and produce direct current
62/284,645	October 6, 2015	White dwarf derived theory, process, apparatus and its applications
62/284,644	October 6, 2015	Gas operated energy catalyzer
Unknown	October 23, 2015	High efficiency thermal power generation system
Unknown	October 26, 2015	Process and apparatus to make heat at high temperature with metals and hydrogen
62/284,647	October 6, 2015	Particular resistive electric heater
62/284,646	October 27, 2015	Vacuum enhanced reactor
Unknown	October 21, 2015	X-rays transparent reactor with 1 MEV excitation
Unknown	November 1, 2015	Enrichment of 62 and 64 Ni isotopes apparatus and process
Unknown	November 1, 2015	Gas operated energy catalyzer
Unknown	November 5, 2015	Direct converter of photons into electric energy
Unknown	November 10, 2015	High efficiency heat generator with Rossi-effect
62/386,560	December 7, 2015	Particular induction electric heater

Application No.	Filing Date	Title
Unknown	December 5, 2015	New theory regarding reaction between nickel, lithium, hydrogen weak interaction energy and in a mirror effect reactor
Unknown	December 5, 2015	Resistive electric heater made conductive ceramics activated by a resistance and a high voltage generator able to be used as a jet engine
62/386,609	December 7, 2015	Electric heater with direct electricity injection
62/386,562	December 7, 2015	Voltage driven heater
62/285,684	November 6, 2015	Particular application with fast reactions of the Rossi effect
Unknown	December 3, 2015	Nickel graphite catalizer
62/386,569	December 7, 2015	Unknown
62/387,940	January 12, 2016	Particular resistive electric heater
Unknown	January 13, 2016	Electric oven with radiation external wall
Unknown	January 13, 2016	Small dimensions energy catalyzer by Rossi effect
62/388,774	February 8, 2016	White dwarf derived pressure system combined with casimer effect and van der waals forces
62/388,777	February 8, 2016	Intertwined metal wire to increase the amperage of electric heaters
62/388,776	February 8, 2016	Nuclear structure theory for the energy catalyzer (E-cat)
Unknown	February 2, 2016	New hydride molecule
Unknown	February 5, 2016	Generator of light, electricity and heat

Application No.	Filing Date	Title
Unknown	February 11, 2016	Fluid heater at high voltage
Unknown	March 21, 2016	3D printing production system for energy catalyzers
Unknown	March 21, 2016	X-rays transparent reactor and its application in a jet engine
Unknown	March 23, 2016	Resistive electric heater made only by resistive ceramics