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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 1:16-cv-21199-CMA

ANDREA ROSSI, et al.,

Plaintiffs,

v.

THOMAS DARDEN, et al.,

Defendants.

- - - - -x
INDUSTRIAL HEAT, LLC, et al.,

Counter-Plaintiffs,

v.

ANDREA ROSSI, et al.,

Counter-Defendants.

and

J.M. PRODUCTS, et al.,

Third-Party Defendants.

- - - - -x
600 Brickell Avenue, Suite 3300
Miami, Florida
Friday, January 27, 2017
10:11 a.m.- 6:04 p.m.

HIGHLY CONFIDENTIAL TRANSCRIPT
ATTORNEYS' EYES ONLY
VIDEO DEPOSITION OF HENRY JOHNSON
Taken before Edward Varkonyi, Registered
Merit Reporter and Notary Public for the State of
Florida at Large, pursuant to Notice of Taking
Deposition filed in the above cause.

1 whatever purpose, to refer to J.M. Products -
2 Advanced Derivatives of Johnson Matthey Platinum
3 Sponge. Did I read that correctly?

4 A. Correct.

5 Q. What is Advanced derivatives of Johnson
6 Matthey Platinum Sponge?

7 A. I take it to mean a product that is
8 produced using Johnson Matthey platinum sponge, a
9 derivative of the sponge.

10 Q. You don't take that to associate any
11 connection between J.M. Products and Johnson Matthey?

12 A. As far as like being an affiliate?

13 Q. Yeah, affiliate, subsidiary, related
14 company in any sort of way.

15 A. No, I do not.

16 Q. Has Andrea Rossi ever told you that the
17 J.M. for J.M. Products was supposed to be short for
18 or suggests to be short for Johnson Matthey?

19 A. No.

20 Q. What do you understand -- do you have any
21 basis to know what the J.M. is short for in J.M.
22 Products?

23 A. No.

24 Q. None whatsoever?

25 A. No.

1 behalf of J.M. Products to go out to Industrial Heat,
2 correct?

3 A. Correct.

4 Q. But one of the things he's saying here is
5 he's asking you to -- or asking Colette "cancel from
6 the head the phrase advanced catalysts with Johnson
7 Matthey, et cetera."

8 Do you know why he's doing that?

9 MR. LEON DE LA BARRA: Object to form.

10 MR. CHAIKEN: Same objection.

11 THE WITNESS: No.

12 BY MR. PACE:

13 Q. What do you know about the removal of
14 trying to identify J.M. Products with Johnson Matthey
15 from the letterhead?

16 MR. LEON DE LA BARRA: Object to form.

17 THE WITNESS: I think it was done --
18 well, he didn't want to appear to be a
19 subsidiary or an affiliate of Johnson Matthey.
20 There are typos in Matthey. It says Matthew
21 rather than Matthey.

22 BY MR. PACE:

23 Q. Just identify that. In the letter itself
24 it references Johnson Matthew platinum sponges, not
25 Johnson Matthey platinum sponges?