

CONFIDENTIAL

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

ANDREA ROSSI and LEONARDO )  
CORPORATION, )  
 )  
 )  
Plaintiffs, )  
 )  
 )  
v. )  
 )  
THOMAS DARDEN; JOHN T. )  
VAUGHN; INDUSTRIAL HEAT, )  
LLC; IPH INTERNATIONAL, )  
B.V. and CHEROKEE )  
INVESTMENT PARTNERS, LLC, )  
 )  
Defendants. )

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

Video Deposition of BARRY WEST  
(Taken by the Plaintiffs)  
Raleigh, North Carolina  
Friday, December 2, 2016

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

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1 do I think. I mean, he'd do that just to, you know,  
2 checks and balances between me and T. Barker, because  
3 we were both doing different stages, different parts of  
4 the thing.

5 Q. Now, who ultimately was responsible or were  
6 tasked with the job of setting up the Doral facility on  
7 the IH side of the wall?

8 A. That would be me.

9 Q. Okay.

10 A. Me and, of course, Andrea, and I had a  
11 couple of guys helping me as well.

12 Q. Couple of guys?

13 A. That was Jose and Marco. They agreed to  
14 come down for a couple months to help me get the things  
15 up and running, you know, because we couldn't finish  
16 all the work. We were missing components.

17 There was some older some components, some  
18 parts that were short, and we couldn't complete the  
19 electrical to be in an operational mode until these  
20 components came in, and we all agreed that this would  
21 have to take place in Florida.

22 Q. Was Jose and Marco, were they Industrial  
23 Heat employees or --

24 A. No, they were independent, just like me.

25 Q. Okay. So you were responsible for setting