

CONFIDENTIAL TRANSCRIPT

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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  
Wednesday, March 1, 2017  
10:14 a.m.- 5:46 p.m.

CONFIDENTIAL TRANSCRIPT  
PORTIONS OF TRANSCRIPT HIGHLY CONFIDENTIAL  
ATTORNEYS' EYES ONLY

VIDEO DEPOSITION OF J.M. PRODUCTS, INC.  
THROUGH ANDREA ROSSI  
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.

## CONFIDENTIAL TRANSCRIPT

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1 Q. Yeah. Maybe use of the word subsequent  
2 was a bad one. I think what you were just telling me  
3 was sometime after this e-mail you, either on behalf  
4 of Leonardo Corporation or on behalf of J.M.  
5 Products, bought some platinum sponge from a Johnson  
6 Matthey subsidiary in the United States; is that  
7 correct?

8 A. I bought from Johnson Matthey a sample of  
9 a -- of a particular filter, from which I could take  
10 off platinum sponges because they do not sell  
11 platinum sponges in small quantities and I needed a  
12 small quantity to make one experiment and so I bought  
13 from -- I bought -- yes, indirectly I bought platinum  
14 sponges, but directly what I bought was a particular  
15 filter that I knew because I used it in Italy for  
16 other things. It's a catalyst.

17 It's a catalyst that contains platinum  
18 sponges and I knew how to take off from that catalyst  
19 the platinum sponge that I need to make the  
20 experiment, to make an experiment.

21 Q. Let me walk backwards, if I can. First  
22 of all, when you bought these filters, you bought  
23 them from a Johnson Matthey subsidiary in the United  
24 States?

25 A. Yes.