

# Exhibit N

Excerpt of Industrial Heat's Responses  
and Objections to Rossi's First Set of  
Interrogatories

memoranda, notes, journals and/or other recordings reflecting observations, measurements or notations made by IH, IPH, Cherokee or any of their respective employees, agents, representatives, guests, investors and/or assigns during the visit.

**ANSWER:** In addition to its General Objections, Industrial Heat objects to this Interrogatory because the terms “representatives” and “assigns,” as used in the context of this Interrogatory, are vague and ambiguous. Industrial Heat objects to this Interrogatory to the extent that it seeks information protected by an Applicable Privilege or Protection. Industrial Heat also understands that this Interrogatory and any other references herein to the “Testing Facility” are meant to refer to 7861 NW 46th Street, Doral, Florida 33166 and not 4861 NW 46th Street, Doral, Florida 33166.

Subject to, and without waiving the foregoing General and Specific Objections, Industrial Heat will produce non-privileged documents addressing any visits to the “Testing Facility” by Industrial Heat, IPH International, Cherokee Investment Partners or an employee, officer or agent of same during the specified time period from which Rossi can ascertain the answers to this Interrogatory. Industrial Heat will provide further identifying information about such documents after the production of documents in discovery. In addition, and without limiting the information in such documents, Industrial Heat states the following about visits to the “Testing Facility” (not limited to visits by Industrial Heat, IPH International, Cherokee Investment Partners or any employee, officer, or agent of same):

1. On or about January 1, 2015, John T. Vaughn visited the Testing Facility for the purpose of checking on the facility. The visit lasted approximately one hour.
2. During the week of February 9, 2015, Thomas Darden, John T. Vaughn visited the Testing Facility with Paul Lamacraft (and possibly Harry Raikes) from the Woodford Fund (“Woodford”). The visit lasted approximately two hours and the

purpose of the visit was to meet with Andrea Rossi, Fulvio Fabiani, James Bass, and Barry West.

3. On or about February 24, 2015, Thomas Barker Dameron and John T. Vaughn visited the Testing Facility to observe the operation of the 1 MW plant (the "Plant") and meet with Andrea Rossi. The visit lasted approximately two hours.
4. On or about March 27, 2015, Daniel Pike, Mia Pike, Xu Hang, and Zhang Jjian visited the Testing Facility to observe the operation of the Plant and meet with Andrea Rossi.
5. On or about July 7, 2015, Steven Hartanto, Hady Hartanto, Lu Rui Feng, Chen Zhen Min, Chen Zheyuan, and Dong Jun Ling visited the Testing Facility to observe the operation of the Plant and meet with Andrea Rossi.
6. On or about August 21, 2015, Thomas Darden, John T. Vaughn, Paul Lamacraft and Harry Raikes visited the Testing Facility to observe the operation of the Plant and meet with Andrea Rossi. This visit lasted less than two hours.
7. On February 16-17, 2016, John T. Vaughn, Joseph Murray and Christopher Pace visited the Testing Facility to observe the shutdown of the Plant and to inspect the methods being used to measure the Plant's performance. The February 15 visit lasted approximately seven hours and the February 16 visit lasted approximately four and a half hours.
8. On or about June 2, 2016, John T. Vaughn, Joseph Murray and Christopher Pace visited the Testing Facility to further observe the Plant following shutdown and to take additional photographs of the Plant. The visit lasted less than 2 hours.