

# EXHIBIT C

(John Mazzarino Deposition Excepts)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

ANDREA ROSSI and LEONARDO  
CORPORATION,

Plaintiffs,

vs.

No. 1:16-cv-2119-CMA

THOMAS DARDEN; JOHN T. VAUGHN;  
INDUSTRIAL HEAT, LLC; IPH  
INTERNATIONAL B.V.; and  
CHEROKEE INVESTMENT PARTNERS,  
LLC,

Defendants.

INDUSTRIAL HEAT, LLC and IPH  
INTERNATIONAL B.V.,

Counter-Plaintiffs,

vs.

ANDREA ROSSI and LEONARDO  
CORPORATION,

Counter-Defendants,

and

J.M. PRODUCTS, INC.; HENRY  
JOHNSON; FABIO PENON; UNITED  
STATES QUANTUM LEAP, LLC;  
FULVVIO FABIANI; and JAMES  
BASS,

Third-Party Defendants.

Videotaped Deposition of  
JOHN MAZZARINO

(Taken by Plaintiff)

3509 North Haworth Drive, Suite 403, Raleigh, North Carolina  
January 13, 2017, 9:07 a.m.

Reported in Stenotype By

Margaret M. Kruse, CSR, RMR, CRR

Transcript produced by computer-aided transcription

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1 Q. Yes. And I appreciate your clarifying and  
2 answering it the way you did. Thank you.

3 MR. ARAN: I have no further questions.

4 MR. NUNEZ: Hi there. Rudy Nunez. Am I coming  
5 through okay?

6 **THE WITNESS: Yes.**

7 **EXAMINATION**

8 BY MR. NUNEZ:

9 Q. Good afternoon, Mr. Mazzarino. Again, Rudy  
10 Nunez. I represent a gentleman by the name of  
11 Fulvio Fabiani and his company United States Quantum Leap.  
12 It's a limited liability here in Florida.

13 Let me ask you, are you familiar with  
14 Mr. Fabiani?

15 **A. Yes, I've met Mr. Fabiani.**

16 Q. And what is your understanding of what role did  
17 Mr. Fabiani have with Mr. Rossi and Industrial Heat?

18 **A. I believe he was an associate of Mr. Rossi's --**  
19 **of Dr. Rossi's who played a technical role at the Raleigh**  
20 **facility of Industrial Heat.**

21 Q. And do you know who employed Mr. Fabiani?

22 **A. I don't know.**

23 Q. Do you have any knowledge as to Mr. Fabiani's  
24 role with Dr. Rossi prior to his work in North Carolina?

25 **A. I don't recall. I don't recall. I knew they**

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1 STATE OF NORTH CAROLINA

2 COUNTY OF W A K E

3 CERTIFICATE

4 I, Margaret M. Kruse, Registered Merit Reporter,  
 5 Certified Realtime Reporter and a Notary Public in and for the  
 6 State of North Carolina duly commissioned and authorized to  
 7 administer oaths and to take and certify depositions, do  
 8 hereby certify that on January 13, 2017, JOHN MAZZARINO, being  
 9 by me personally duly sworn to tell the truth, thereupon  
 10 testified as above set forth as found in the preceding pages,  
 11 this examination being reported by me verbatim and then  
 12 reduced to typewritten form under my direct supervision; that  
 13 the foregoing is a true and correct transcript of said  
 14 proceedings; that I am neither kin nor counsel to any of the  
 15 parties to this action; that I am not interested in the  
 16 outcome of this case; that I am not in the employ of any of  
 17 the parties to this action.

18 IN WITNESS WHEREOF, I have hereto set my hand, this  
 19 the 20th day of January, 2017.




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Margaret M. Kruse, RMR, CRR

24 Notary Public #20163210024

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