

Exhibit I

Thomas Barker Dameron Deposition Transcript Excerpts

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 CASE NO. 1:16-cv-21199-CMA/O'Sullivan
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6 ANDREA ROSSI and LEONARDO)

7 CORPORATION,)

8 Plaintiffs,)

9 v.)

10 THOMAS DARDEN; JOHN T.)

11 VAUGHN; INDUSTRIAL HEAT,)

12 LLC; IPH INTERNATIONAL,)

13 B.V. and CHEROKEE)

14 INVESTMENT PARTNERS, LLC,)

15 Defendants.)

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

17
18 Video Deposition of THOMAS BARKER DAMERON, III
19 (Taken by the Plaintiffs)
20 Raleigh, North Carolina
21 Thursday, December 1, 2016
22
23
24

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

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1 A. I think he got a check from industrial.

2 Q. And Mr. Fabiani, was he hired by Industrial
3 Heat?

4 A. Like I said, I think he probably had a
5 contract with and was paid for by Industrial Heat and
6 worked under the direction of Andrea.

7 Q. Do you know if Industrial Heat ever sent an
8 invoice to JM Products for the power that JM was
9 reporting that it received?

10 A. Wait, say that question again?

11 Q. For the heat.

12 A. Say that question again?

13 Q. Do you know whether Industrial Heat ever
14 sent an invoice or requested payment from JM Products
15 for the power that they received or the heat that they
16 received?

17 A. I don't know.

18 Q. Have you ever spoken with anyone at JM
19 Products?

20 A. Not that I recall.

21 Q. When you were at the plant in February of
22 2015, did you ever meet Mr. James Bass?

23 A. I think I did not.

24 Q. Did you ask to?

25 A. Not that I recall.

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1 What's the basis for it?

2 MR. PACE: Can I just say if it's on
3 the basis of conversations with counsel, you
4 should tell him, but if it's not on the
5 basis of conversations with counsel, you
6 should answer the question.

7 A. Okay. I think it is based on various
8 discussions at Industrial Heat with mainly J.T., I
9 would have said.

10 Q. And what is it that you learned about
11 Mr. Johnson from those discussions with J.T.?

12 A. That he represents Andrea in several
13 things. He seems to be involved in JM Products. Those
14 are the main things.

15 Q. How about Jim Bass or James Bass? Have you
16 ever met him?

17 A. Not I'm aware of.

18 Q. Have you had any phone conversations or
19 exchange any emails with him?

20 A. No.

21 Q. What do you know about Jim Bass or who he
22 is?

23 A. I know very little about him. I think he's
24 involved with JM Products or whatever that name is, but
25 that's about all.