

Exhibit 19

02/17/2017 Joseph Alan Murray

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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;)
FULVIO FABIANI; and JAMES)
BASS,)

Third-Party Defendants.)

HIGHLY CONFIDENTIAL

Videotaped Deposition of JOSEPH ALAN MURRAY
(Taken by Plaintiff)
Raleigh, North Carolina
Friday, February 17, 2017

Reported in Stenotype by
Lauren M. McIntee, RPR
Transcript produced by computer-aided transcription

1 the margin of error?

2 A. The, these devices, it's, it depends upon if
3 you're in the transitional region or you're above it.
4 You, I would have to look at the type certification from
5 the manufacturer to know.

6 Q. But you don't know sitting here today for
7 this particular device?

8 A. No.

9 Q. Okay. Now, if you operate outside, is it
10 your understanding that the margin of error increases?

11 A. Yes.

12 Q. Okay. Did you ever do any testing on the
13 actual flow meter that was used for the Doral facility
14 350-day test, what we're calling the guaranteed
15 performance test?

16 A. The --

17 MR. LOMAX: Objection to the form of the
18 question.

19 MR. ANNESSER: What's the objection?

20 MR. LOMAX: To the extent that it gets into
21 any kind of attorney work product or attorney-client
22 privileged information.

23 Q. Okay. Go ahead and answer, sir.

24 A. Repeat the question.

25 Q. Did you do any testing on the actual flow

1 meter used during the guaranteed performance test?

2 A. No. That flow meter was taken by Mr. Penon
3 back to Italy --

4 Q. Okay.

5 A. -- at the end of the test. I took pictures
6 of it and collected data on what it was.

7 Q. Okay. I'd like to ask you to turn to Page 9
8 of 39 of Exhibit 7.

9 A. Uh-huh.

10 Q. And you continue to discuss the flow meter
11 here I believe. And the last sentence of the paragraph
12 on this page states, "In addition, we have estimated
13 that the visible portion of the pipe has about five
14 elbows and one DN40 valve."

15 A. Uh-huh.

16 Q. What are elbows?

17 A. Elbows are pipe elbows. So right angle or
18 45-degree angle turns in a pipe.

19 Q. Okay. Where were those elbows that you
20 were --

21 A. On the inside of the container on the steam
22 side.

23 Q. On the steam side, okay.

24 A. Yeah.

25 Q. How do you know what the inside looked like?

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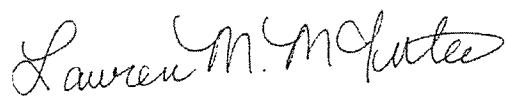
STATE OF NORTH CAROLINA
COUNTY OF WAKE:

REPORTER'S CERTIFICATE

I, LAUREN McINTEE, RPR, a Notary Public in and for the State of North Carolina, do hereby certify that there came before me on Friday, the 17th day of February, 2017, the person hereinbefore named, who was by me duly sworn to testify to the truth and nothing but the truth of his knowledge concerning the matters in controversy in this cause; that the witness was thereupon examined under oath, the examination reduced to typewriting under my direction, and the deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any attorney or counsel employed by the parties hereto or financially interested in the action.

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



LAUREN McINTEE, RPR, Notary Public
Notary Number: 201616600044