

EXHIBIT 4

CONFIDENTIAL TRANSCRIPT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

Page 6

1 THE WITNESS: I do.
 2 DIRECT EXAMINATION
 3 BY MR. PACE:
 4 Q. Dr. Rossi, can you state your full name.
 5 A. Andrea Rossi.
 6 Q. And what's your present work address?
 7 A. 1331 Lincoln Road, Miami Beach, Florida
 8 33139.
 9 Q. Is that also your resident address?
 10 A. Yes.
 11 Q. Is it the same unit within the building
 12 where you work and you reside?
 13 A. Yes.
 14 Q. Do you have -- you're here testifying
 15 today as the representative of J.M. Products,
 16 correct?
 17 A. Correct.
 18 Q. Do you have any formal title or position
 19 within J.M. Products?
 20 A. Yes, I am the so to speak director, with
 21 a small D. So I am the scientific and technical
 22 director of the plant that I have designed and
 23 invented and -- but I do not have corporate tasks.
 24 Q. So let me ask my question again. Do you
 25 have any formal title within J.M. Products?

Page 7

1 Your answer is no, correct?
 2 A. I do not know what you mean by formal.
 3 Q. Fair enough. Let me ask you, do you have
 4 any title -- do you hold any position as an officer
 5 or director of J.M. Products?
 6 A. When you mean director, what do you
 7 mean?
 8 Q. Do you know what a director of a
 9 corporation in the United States is?
 10 A. No.
 11 Q. Okay. Do you know what a board of
 12 directors for a corporation in the United States?
 13 A. Yes, I know what is a board of directors.
 14 Q. In this context, a director, I am
 15 referring to a member of a board of directors.
 16 So as to J.M. Products, are you a
 17 corporate officer of J.M. Products?
 18 A. No.
 19 Q. Are you a member of the board of
 20 directors of J.M. Products?
 21 A. No.
 22 Q. Okay. When you just described yourself
 23 as a director, small D, of J.M. Products, has anyone
 24 ever given you that title?
 25 A. I gave it -- you know, I gave it to

Page 8

1 myself because discussing with the president,
 2 attorney Johnson, we can see that I can be qualified
 3 that way because I directed the plant.
 4 For example, I am the person most
 5 qualified to answer to the question put in your paper
 6 upon which I am here now.
 7 Q. I understand. And that's because you
 8 control -- you control all aspects of J.M. Products,
 9 correct?
 10 MR. ARAN: Objection to form.
 11 THE WITNESS: Sorry, I must ask you as
 12 the other times to be so kind to speak a little
 13 bit slow. I understand perfectly English.
 14 BY MR. PACE:
 15 Q. I will. No, I sometimes ask --
 16 A. Just if you go fast I --
 17 Q. Fair enough.
 18 A. I don't get it.
 19 Q. You control all aspects of J.M. Products,
 20 correct?
 21 MR. ARAN: Objection to form.
 22 MR. CHAIKEN: Object to form.
 23 THE WITNESS: Your -- your question is
 24 correct in the measure of technical tasks.
 25 BY MR. PACE:

Page 9

1 Q. How about financial tasks, doesn't all
 2 money -- isn't all the money that J.M. Products uses
 3 to pay for any expenses it has come from either you
 4 or Leonardo Corporation?
 5 A. But that was on the base of a contract
 6 that -- of an agreement that there was between J.M.
 7 and Leonardo Corporation and this agreement foresaw
 8 that Leonardo Corporation was going to pay all the
 9 bills and expenses for the day by day activity of
 10 J.M. as a compensation for products that Leonardo
 11 Corporation was going to buy from J.M.
 12 Q. So my question again, because you didn't
 13 answer it. You started with a but response.
 14 All of the money for any expenses paid by
 15 J.M. Products came from either you or Leonardo
 16 Corporation; yes or no?
 17 A. I don't know if all the money paid by
 18 J.M. came from Leonardo Corporation of me.
 19 Q. So let's go -- let's talk a little bit
 20 about what you did to prepare to be the corporate
 21 representative J.M. Products today because that's an
 22 answer you should have, you should have prepared for,
 23 so let's talk about this.
 24 To prepare today to speak as the
 25 corporate representative of J.M. Products with whom

CONFIDENTIAL TRANSCRIPT

Page 18

1 could have been -- in the top of the plant there
 2 could have been expenses not made by Leonardo or me
 3 at the very beginning.
 4 And -- but what -- as far as I recall,
 5 all the day by day expenses have been paid by
 6 Leonardo Corporation. Not by me as Andrea Rossi, by
 7 Leonardo Corporation.
 8 Q. And then -- since you are here testifying
 9 as the corporate representative of J.M. Products your
 10 testimony is you're not aware of any other expenses
 11 that J.M. Products incurred in connection with the
 12 Doral location, correct?
 13 A. Not that I am aware of.
 14 Q. All right. So all expenses of J.M.
 15 Products were being paid -- as they relate to the
 16 Doral location were being paid by Leonardo
 17 Corporation, correct?
 18 MR. ARAN: Objection to form.
 19 THE WITNESS: All the expenses I am aware
 20 of.
 21 BY MR. PACE:
 22 Q. You are aware of as the corporate
 23 representative of J.M. Products and who also spoke
 24 with Henry Johnson, the president of J.M. Products,
 25 correct?

Page 19

1 MR. ARAN: Objection to form.
 2 THE WITNESS: Again, I was the scientific
 3 and technological director, so I spoke with
 4 Henry Johnson for what concerns all the
 5 expenses.
 6 When I spoke with Henry Johnson, when we
 7 spoke about expenses, we spoke only about the
 8 expenses I was aware of, which are the expenses
 9 I explained before, the day by day expenses, you
 10 know, the employee, the consultant, the bill of
 11 FPL, et cetera, et cetera, et cetera and
 12 invoices that came for some technological issue
 13 or technical issue.
 14 And -- but again, I am not aware of and I
 15 do not know if there have been or not other
 16 expenses independent from this activity.
 17 BY MR. PACE:
 18 Q. So you learned nothing from
 19 discussions -- your discussions with Henry Johnson
 20 about any expenses you didn't already know about?
 21 A. Can you repeat?
 22 Q. You told us you spoke with Henry Johnson
 23 about expenses of Leonardo.
 24 A. Yes.
 25 Q. I'm sorry, expenses of J.M. Products.

Page 20

1 A. Yes, yes.
 2 Q. Sounds though what you just said is he
 3 didn't make -- he didn't inform you of any expenses
 4 you weren't otherwise already aware of?
 5 A. He had no reason to do that because --
 6 Q. Because?
 7 A. Because I did not ask. It was not -- I
 8 was interested to the activity -- to the scientific
 9 and technological activity of J.M.
 10 Q. So as the corporate representative of
 11 J.M. Products sitting here today, however, your
 12 testimony is you are not aware of a single expense
 13 incurred by J.M. Products that wasn't paid for or
 14 reimbursed by either Andrea Rossi or Leonardo
 15 Corporation, correct?
 16 A. You are asking me if I am -- I am
 17 repeating your question to be sure I have understood
 18 it because I want to answer properly.
 19 You have asked me, if I understood, if I
 20 am aware of other expenses, apart the ones Leonardo
 21 Corporation has paid for. Is this the question?
 22 Q. Leonardo Corporation or Andrea Rossi.
 23 A. Yeah, okay.
 24 Q. I just want to make sure you understood
 25 the question.

Page 21

1 A. The answer is yes.
 2 Q. You are aware of other expenses incurred
 3 by J.M. Products?
 4 A. No.
 5 Q. You're not answering my question. Let me
 6 try it again.
 7 A. Yes.
 8 Q. As the corporate representative of J.M.
 9 Products do you know of any expenses incurred by J.M.
 10 Products, other than the expenses that were paid for
 11 by either Leonardo Corporation or Andrea Rossi?
 12 A. No.
 13 Q. All right. How many times has Henry
 14 Johnson been to the Doral -- I'm sorry, let me define
 15 something here.
 16 If I refer to the Doral warehouse --
 17 what's the address of J.M. Products? What's the
 18 address of J.M. Products?
 19 A. 7861 Northwest 46th Street, Doral,
 20 Florida 33166.
 21 Q. If I refer to that as either the Doral
 22 warehouse or the Doral location, are you comfortable
 23 with that?
 24 A. Yes.
 25 Q. Okay. How many times has Henry Johnson

CONFIDENTIAL TRANSCRIPT

Page 26	<p>1 direction.</p> <p>2 Q. Under who else's direction, Jim Bass?</p> <p>3 A. Yes.</p> <p>4 Q. And Jim Bass is an individual that you --</p> <p>5 you made the decision to hire Jim Bass for J.M.</p> <p>6 Products, correct?</p> <p>7 A. Yes, but -- yes. Yes, yes.</p> <p>8 Q. You did not find Jim Bass initially,</p> <p>9 correct?</p> <p>10 A. No, I did not.</p> <p>11 Q. So I am not suggesting you did but the</p> <p>12 decision to hire Jim Bass was by you?</p> <p>13 A. Yes.</p> <p>14 Q. Back to my -- you resisted answering the</p> <p>15 control question, so I am trying to understand why.</p> <p>16 A. I did not understand what you said.</p> <p>17 Q. Sure. I asked you -- you were reluctant</p> <p>18 to answer yes to the question that, you know, Andrea</p> <p>19 Rossi controls -- controls J.M. Products.</p> <p>20 A. It is absolutely --</p> <p>21 MR. ARAN: Objection to form. There is</p> <p>22 no question pending. There is no question</p> <p>23 pending.</p> <p>24 MR. PACE: What are you instructing him</p> <p>25 not to do then?</p>	Page 28	<p>1 MR. ARAN: Objection to form.</p> <p>2 MR. CHAIKEN: Object to form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MR. PACE:</p> <p>5 Q. Why is it that Andrea Rossi does not</p> <p>6 control J.M. Products?</p> <p>7 A. Because to control J.M. Products mean to</p> <p>8 have full control of J.M. Products. As you -- as you</p> <p>9 have heard from the beginning, I was not in the board</p> <p>10 of directors. I was not the president. I was not</p> <p>11 the CEO.</p> <p>12 I was the director of all the scientific</p> <p>13 research and development activity and experimental</p> <p>14 activity of J.M., so I was the director and I am</p> <p>15 responsible about all the day by day operations,</p> <p>16 working operations that take -- that have taken act</p> <p>17 inside the factory of J.M., not of all the actions or</p> <p>18 deeds that are related to the -- to the activity that</p> <p>19 is proper of a president or of a board of directors.</p> <p>20 Q. What other activities does J.M. Products</p> <p>21 engage in, other than activities that you have</p> <p>22 controlled?</p> <p>23 A. I don't know.</p> <p>24 Q. As the corporate representative of J.M.</p> <p>25 Products here today you are not aware of any</p>
Page 27	<p>1 MR. ARAN: I am objecting to the form,</p> <p>2 which is you are simply making statements that</p> <p>3 are not questions.</p> <p>4 I am objecting to the form and I am</p> <p>5 suggesting there is no question pending for him</p> <p>6 to answer.</p> <p>7 BY MR. PACE:</p> <p>8 Q. You were responding. I'm sorry.</p> <p>9 A. I'm sorry, attorney, but I totally</p> <p>10 disagree with you. I am not resisting the facts that</p> <p>11 you are saying.</p> <p>12 I always answered yes to every question</p> <p>13 that you asked to me related to the fact that I was</p> <p>14 the director of the day by day operation of J.M.</p> <p>15 Q. I know, but I was asking you a question</p> <p>16 about control and that's where you resisted, so let</p> <p>17 me ask it again.</p> <p>18 Andrea Rossi controls all aspects of J.M.</p> <p>19 Products, correct?</p> <p>20 MR. ARAN: Objection to form.</p> <p>21 MR. CHAIKEN: Object to form.</p> <p>22 THE WITNESS: No.</p> <p>23 BY MR. PACE:</p> <p>24 Q. Andrea Rossi controls J.M. Products,</p> <p>25 correct?</p>	Page 29	<p>1 activities in which J.M. Products is engaged that has</p> <p>2 not been controlled by Andrea Rossi?</p> <p>3 A. I am --</p> <p>4 MR. ARAN: Objection to form. He's here</p> <p>5 to testify about the matters set forth in your</p> <p>6 designated deposition, which deals with J.M.'s</p> <p>7 activities as they relate to this lawsuit and</p> <p>8 the operations of J.M. as it relates to this</p> <p>9 lawsuit and the operation of the E-Cat, et</p> <p>10 cetera. It does not deal with anything else</p> <p>11 that J.M. may have or not have.</p> <p>12 MR. PACE: A, that's not true. B, that's</p> <p>13 kind of a coaching, speaking objection. You can</p> <p>14 make an objection, if it's a fair objection.</p> <p>15 MR. ARAN: I will not help you anymore</p> <p>16 again.</p> <p>17 MR. PACE: No, no, I understand.</p> <p>18 MR. ARAN: I am trying to help you.</p> <p>19 BY MR. PACE:</p> <p>20 Q. That's fine. By the way, he's made the</p> <p>21 objection. I want to make sure it's clear on the</p> <p>22 record, I am not disputing that, that the objection</p> <p>23 is here.</p> <p>24 Let me try to rephrase my question.</p> <p>25 Well, I think your answer might go to a scope issue</p>

CONFIDENTIAL TRANSCRIPT

Page 42

1 A. I don't say they didn't. I say I don't
 2 recall.
 3 Q. That's all I am asking for. I am asking
 4 for what you know, what you recall and your
 5 recollection --
 6 A. I don't recall.
 7 Q. -- is that it never happened?
 8 A. Should they have made it they would have
 9 asked to me to breach a contract that they had
 10 signed.
 11 Q. I understand. I understand what you
 12 think the law is but I am just asking you for your
 13 recollection.
 14 A. You're asking me --
 15 Q. Dr. Rossi --
 16 A. You are asking me if --
 17 Q. Dr. Rossi, let's go on to our next
 18 question.
 19 A. Okay.
 20 Q. There is a question, I get an answer from
 21 you, all right?
 22 And your answer is to the best of your
 23 recollection you don't believe you ever told anyone
 24 from Industrial Heat that they could not access the
 25 Doral -- the J.M. Products side of the Doral

Page 44

1 A. Okay.
 2 Q. Jim Bass, what title did you give to Jim
 3 Bass in connection with J.M. Products?
 4 A. Consultant, scientific consultant.
 5 Q. Why did he represent himself as the
 6 director of engineering for J.M. Products?
 7 A. Because he was for what concern -- for
 8 what concerned the part related to the electronics
 9 that we were developing there, he was the director.
 10 So he was -- in the sense he was a
 11 director. Also, I must ask you that Tom Darden asked
 12 me to present him as the director to his investors,
 13 to have references from the director of the customer
 14 that he was satisfied. You know --
 15 Q. Let me stop you there. I will break this
 16 out. We can get to the conversation.
 17 A. Okay.
 18 Q. Let's make sure I am clear for what you
 19 said.
 20 A. Okay.
 21 Q. You're saying Tom Darden wanted someone
 22 from J.M. Products to meet with potential investors,
 23 correct?
 24 I am just going to take this one little
 25 chunk at a time. Is that correct, somebody from J.M.

Page 43

1 warehouse, correct?
 2 A. No.
 3 MR. CHAIKEN: Object to form.
 4 MR. ARAN: Object to form.
 5 THE WITNESS: I did not say that. I say
 6 I do not recall.
 7 BY MR. PACE:
 8 Q. I'm sorry. I said to the best of your
 9 recollection.
 10 A. No, you said to the best of your
 11 recollection you believe that. I did not say so. I
 12 say as I am -- I say just I don't recall. I do not
 13 say I don't believe.
 14 I say I don't recall. You know English
 15 better than me but some English I have learned. To
 16 recall is one thing and to believe is another thing.
 17 And I also added that if they did, they
 18 made an illegal action because they asked to breach a
 19 contract.
 20 Q. Dr. Rossi, Andrea Rossi, you've said this
 21 several times never in response to my question so
 22 let's see if we can --
 23 A. No, I responded to your question. I
 24 don't recall.
 25 Q. Let's keep going here.

Page 45

1 Products?
 2 A. Someone that was not me.
 3 Q. We will keep going this with little
 4 chunks and see if we can do it in little pieces
 5 here.
 6 A. Very good.
 7 Q. You're telling me Tom Darden told you --
 8 A. Yeah.
 9 Q. -- that he wanted somebody from J.M.
 10 Products, other than you, to meet with potential
 11 investors, correct?
 12 A. Yes, it is correct.
 13 Q. And Tom Darden asked you that this person
 14 be knowledgeable about the power or energy being
 15 received by J.M. Products from Leonardo Corporation,
 16 correct?
 17 MR. CHAIKEN: Object to form.
 18 BY MR. PACE:
 19 Q. Do you want me to ask the question again?
 20 A. No, no, no I have understood perfectly
 21 your question and it is correct.
 22 Q. Did Tom Darden tell you -- did Tom Darden
 23 identify the particular person who should meet with
 24 these investors?
 25 A. There was not another.

CONFIDENTIAL TRANSCRIPT

<p style="text-align: right;">Page 254</p> <p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3 STATE OF FLORIDA:</p> <p>4 SS:</p> <p>5 COUNTY OF DADE:</p> <p>6</p> <p>7</p> <p>8 I, the undersigned authority, certify that</p> <p>9 ANDREA ROSSI personally appeared before me and was</p> <p>10 duly sworn.</p> <p>11 WITNESS my hand and official seal this 13th</p> <p>12 day of March 2017.</p> <p>13</p> <p>14</p> <p>15 <i>Edmed Varkonyi</i></p> <p>16 _____</p> <p>17 Notary Public, State of Florida at</p> <p>18 Large; my commission expires</p> <p>19 February 26, 2019. Bonded through</p> <p>20 Troy Fain Insurance, Inc.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 256</p> <p>1 March 13, 2017</p> <p>2</p> <p>3</p> <p>4</p> <p>5 FERNANDO ARAN, ESQ.,</p> <p>6 Aran Correa & Guarch, P.A.</p> <p>7 255 University Drive</p> <p>8 Coral Gables, Florida 33134</p> <p>9 RE: Rossi v. Darden</p> <p>10 Dear Mr. Aran,</p> <p>11 With reference to the deposition of Andrea Rossi</p> <p>12 taken on March 1, 2017 in connection with the</p> <p>13 above-captioned case, please be advised that the</p> <p>14 transcript of the deposition has been completed</p> <p>15 and is awaiting signature.</p> <p>16 Please arrange to have the deponent stop by our</p> <p>17 office at Two South Biscayne Boulevard, Suite</p> <p>18 2250, Miami, Florida, for the purpose of reading</p> <p>19 and signing the transcript.</p> <p>20</p> <p>21 If this is not taken care of, however, within the</p> <p>22 next 30 days, we shall conclude that the reading</p> <p>23 and signing of the deposition has been waived and</p> <p>24 shall then process the original of the transcript</p> <p>25 for filing with the Clerk of the Court by counsel</p> <p>without further notice.</p> <p>Sincerely,</p> <p>Edward Varkonyi, Registered Merit Reporter</p>																																																																
<p style="text-align: right;">Page 255</p> <p>1 CERTIFICATE OF REGISTERED PROFESSIONAL REPORTER</p> <p>2</p> <p>3 I, EDWARD VARKONYI, and Registered</p> <p>4 Professional Reporter and a Notary Public for the</p> <p>5 State of Florida at Large, do hereby certify that I</p> <p>6 reported the deposition of ANDREA ROSSI; that the</p> <p>7 foregoing pages, numbered from 1 to 253, inclusive,</p> <p>8 constitute a true and correct transcription of my</p> <p>9 shorthand report of the deposition by said witness on</p> <p>10 this date.</p> <p>11 I further certify that I am not an</p> <p>12 attorney or counsel of any of the parties, nor a</p> <p>13 relative or employee of any attorney or counsel</p> <p>14 connected with the action, nor financially interested</p> <p>15 in the action.</p> <p>16 WITNESS my hand and official seal in the</p> <p>17 City of Miami, County of Dade, State of Florida, this</p> <p>18 13th day of March 2017.</p> <p>19</p> <p>20</p> <p>21 <i>Edmed Varkonyi</i></p> <p>22 _____</p> <p>23 Notary Public, State of Florida at</p> <p>24 Large; my commission expires</p> <p>25 February 26, 2019. Bonded through</p> <p>Troy Fain Insurance, Inc.</p>	<p style="text-align: right;">Page 257</p> <p>1 ERRATA SHEET</p> <p>2 RE : Rossi v. Darden</p> <p>3 DEPO OF: Andrea Rossi</p> <p>4 TAKEN : 3/1/17</p> <p>5 ASSG# : 2553727</p> <p>6 DO NOT WRITE ON TRANSCRIPT, ENTER ANY CHANGES HERE</p> <table border="1"> <thead> <tr> <th>Page #</th> <th>Line #</th> <th>Change</th> <th>Reason</th> </tr> </thead> <tbody> <tr><td>6</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>7</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>8</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>9</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>10</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>11</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>12</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>13</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>14</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>15</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>16</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>17</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>18</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>19</td><td>_____</td><td>_____</td><td>_____</td></tr> <tr><td>20</td><td>_____</td><td>_____</td><td>_____</td></tr> </tbody> </table> <p>21 State of Florida)</p> <p>22 County of)</p> <p>23 Under penalties of perjury, I declare that I have</p> <p>24 read my deposition transcript, and it is true and</p> <p>25 correct subject to any changes in form or substance</p> <p>entered here.</p> <p>_____ Date Signature</p>	Page #	Line #	Change	Reason	6	_____	_____	_____	7	_____	_____	_____	8	_____	_____	_____	9	_____	_____	_____	10	_____	_____	_____	11	_____	_____	_____	12	_____	_____	_____	13	_____	_____	_____	14	_____	_____	_____	15	_____	_____	_____	16	_____	_____	_____	17	_____	_____	_____	18	_____	_____	_____	19	_____	_____	_____	20	_____	_____	_____
Page #	Line #	Change	Reason																																																														
6	_____	_____	_____																																																														
7	_____	_____	_____																																																														
8	_____	_____	_____																																																														
9	_____	_____	_____																																																														
10	_____	_____	_____																																																														
11	_____	_____	_____																																																														
12	_____	_____	_____																																																														
13	_____	_____	_____																																																														
14	_____	_____	_____																																																														
15	_____	_____	_____																																																														
16	_____	_____	_____																																																														
17	_____	_____	_____																																																														
18	_____	_____	_____																																																														
19	_____	_____	_____																																																														
20	_____	_____	_____																																																														

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.