

HIGHLY CONFIDENTIAL- ATTORNEYS' EYES ONLY

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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
Friday, February 10, 2017
10:11 a.m. - 7:25 p.m.

HIGHLY CONFIDENTIAL TRANSCRIPT
ATTORNEYS' EYES ONLY
VIDEO DEPOSITION OF ANDREA ROSSI

Taken before Janet Baldauf, Registered
Professional Reporter and Notary Public in and for
the State of Florida at Large, pursuant to Notice of
Taking Deposition filed in the above cause.

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1 Q. -- your testimony of that is that was steam
 2 coming through?
 3 A. Yes, sir.
 4 Q. And then the steam would carry through these
 5 insulated pipes?
 6 MR. ANNESSER: Object to form.
 7 BY MR. PACE:
 8 Q. The four top insulated pipes in either the
 9 form of steam or water?
 10 A. I do not understand the question.
 11 MR. LEON DE LA BARRA: Object to form.
 12 BY MR. PACE:
 13 Q. Sure. Looking at Exhibit 17.
 14 A. 17, okay.
 15 Q. Your testimony is that at the very top, we
 16 see a pipe at the very top of Exhibit 17.
 17 A. You know, let us number -- to allow me to
 18 understand, you are talking about the first pipes from
 19 the top, one, two, three, four, correct?
 20 Q. Correct. So let's do that. So the very top
 21 pipe we'll say number one. Steam comes into pipe
 22 number one?
 23 A. Yes.
 24 Q. Correct? Are the reactors placed in pipe
 25 number one?

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1 A. Yes.
 2 Q. The steam -- and this is -- all this piping
 3 is insulated?
 4 A. Yes.
 5 Q. Did I understand correctly from -- I think
 6 Jim Bass' testimony that there are also heat strips on
 7 these pipes?
 8 MR. ANNESSER: Object to form.
 9 MR. LEON DE LA BARRA: Join.
 10 THE WITNESS: I did not understand your
 11 question. I'm sorry.
 12 BY MR. PACE:
 13 Q. Were there heat strips on any these pipes?
 14 A. Strips? What do you mean strips?
 15 Q. Heat strips through which you could send a
 16 little current of heat up, potentially heat the outside
 17 of the pipe?
 18 A. No, no, no. Not strips.
 19 Q. Coils?
 20 A. I think I have understood. I'm not sure,
 21 but I think I have understood what you are referring
 22 to. I try to help you, so you tell me if I have
 23 understood.
 24 Q. Okay.
 25 A. When you say strip, you mean that heating

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1 cable. Okay. It is called a heating cable.
 2 Q. Heating cable?
 3 A. Now I can understand.
 4 Q. So there's this heating cable in here
 5 underneath this insulation?
 6 A. This is -- yes, between the insulation and
 7 the pipe.
 8 Q. Understood.
 9 A. Do you want to know what it is for?
 10 MR. ANNESSER: Just wait for the question
 11 please.
 12 BY MR. PACE:
 13 Q. Do I want to know what it's called or what
 14 it's for?
 15 A. Sorry.
 16 Q. Did you just say do I want to know what it's
 17 called or what it's for?
 18 A. No. What it is for.
 19 Q. I do in a second, but I just want to before
 20 I get to that, the steam that comes into this pipe
 21 number one, it becomes water before it goes out on
 22 Exhibit 16 back on over to Leonardo side, correct?
 23 MR. ANNESSER: Object to form.
 24 MR. LEON DE LA BARRA: Join.
 25 THE WITNESS: You have skipped many

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1 passages.
 2 BY MR. PACE:
 3 Q. I understand that. I'm jumping from one to
 4 the other so I understand that it's --
 5 A. What I can tell you is that what you have
 6 inside the insulated pipes is steam.
 7 Q. Uh-huh.
 8 A. What you have inside the other insulating
 9 pipes that return to the plant, that is water.
 10 Q. Right. That's what we just said.
 11 A. Okay.
 12 Q. Now, I'm just trying to -- you might tell me
 13 it's not in either of these pictures, but where in
 14 these pictures does the steam convert to water?
 15 A. It's not here.
 16 Q. It's not in these pictures?
 17 A. No.
 18 Q. There's -- am I missing something in the
 19 pictures?
 20 A. No, you are not missing anything of the
 21 pictures, but these pictures do not explain where the
 22 steam becomes water.
 23 Q. Why is that?
 24 A. Because --
 25 MR. ANNESSER: Why do the pictures not show

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1 that?

2 MR. PACE: Yes. I'm trying to understand.

3 THE WITNESS: You know, these picture are,

4 first of all --

5 MR. ANNESSER: Just answer his question if

6 you understand it. I'm going to object to the

7 form because I'm not sure I understand the

8 question.

9 THE WITNESS: The place where the steam

10 became water is not -- is not illustrated by these

11 photographs, Attorney.

12 BY MR. PACE:

13 Q. But it did occur somewhere within the

14 container?

15 MR. LEON DE LA BARRA: Object to form.

16 THE WITNESS: Can you repeat the question.

17 BY MR. PACE:

18 Q. But the conversion of steam to water

19 occurred in the container?

20 MR. ANNESSER: Object to form.

21 MR. LEON DE LA BARRA: Object to the form.

22 THE WITNESS: No.

23 BY MR. PACE:

24 Q. Where did it occur, outside the container

25 then?

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1 A. Yes.

2 Q. Where outside the container?

3 A. In a proper heat exchanger that was placed

4 not inside the container.

5 Q. Where was the heat exchanger?

6 A. The heat exchanger was in a proper room that

7 is not indicated in this photographs. The steam

8 through a pipe is gone in a heat exchanger that is not

9 here.

10 Q. This heat exchanger, who installed that?

11 A. I did.

12 Q. Who helped you install it?

13 A. Contractors.

14 Q. Which contractors?

15 A. Well, I use very much flying contractors

16 that in that industrial park everyday come to know if

17 you need something. I use it to many of them. The

18 heat exchanger that I have put down has been made by me

19 with their help.

20 Q. Okay.

21 A. So -- in -- sorry.

22 Q. I'm sorry. I interrupted you that time.

23 Please finish your answer.

24 A. I had finished.

25 Q. Do you know their names? Do you know any of

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1 their names?

2 A. No, I don't remember. We are talking of two

3 years ago, and they were just guys. In that area, if

4 you go there, they have the truck. It's people that

5 has a truck that is a small workshop. They have

6 everything there. You call them, and they are able to

7 do anything. They are able to do whatever you need.

8 Q. Who removed it?

9 A. Sorry.

10 Q. Who removed this heat exchanger that you

11 built?

12 A. It has been built by pipes --

13 Q. No. I'm sorry. My question was who removed

14 it?

15 MR. LEON DE LA BARRA: Object to form.

16 THE WITNESS: I removed it with the help of

17 contractors.

18 BY MR. PACE:

19 Q. Because it doesn't exist any longer at the

20 Doral plant?

21 A. No because I have used the pieces of it to

22 do other things because now it was completely useless.

23 Q. Well, it didn't exist at the Doral location

24 in February of 2016, did it?

25 MR. ANNESSER: Object to the form.

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1 THE WITNESS: Can you -- I did not

2 understand the question.

3 BY MR. PACE:

4 Q. Sure. You remember seeing me at the Doral

5 warehouse in December 16 of 2016?

6 A. I remember.

7 Q. The heat exchanger you are talking about now

8 had been removed by then, correct?

9 MR. ANNESSER: Object to form.

10 MR. LEON DE LA BARRA: Join.

11 THE WITNESS: I don't understand the

12 English. This heat exchanger has been removed

13 after the end of the test.

14 BY MR. PACE:

15 Q. Okay. So it was sometime after

16 February 2016?

17 A. If this was the question, this is the

18 answer. Sorry.

19 Q. I'm still a little lost and then we'll take

20 a quick break here because we have to move on to some

21 other subjects before we end, but you said in Exhibit

22 17 --

23 A. Yes.

24 Q. -- what comes into there, that top pipe,

25 what we labeled as pipe number one is steam, correct?

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1 A. I am very sorry. I did not understand the
 2 question.
 3 Q. Sure. Let's go through this again. In
 4 Exhibit 17 --
 5 A. Yes.
 6 Q. -- the top pipe in that picture.
 7 A. The top pipe, number one, yes.
 8 Q. What you call number one.
 9 A. Yes.
 10 Q. You said what came in there was steam?
 11 A. Came in where was steam? Was full of steam.
 12 Q. What came in this pipe was steam?
 13 A. Yes, yes. It was full of steam.
 14 Q. So somewhere the steam had to exit -- your
 15 testimony now is that somewhere the steam had to exit
 16 this container and go to -- and the heat at least from
 17 the steam had to exit the container and be dissipated
 18 or sent out of the warehouse; is that correct?
 19 A. No.
 20 Q. Okay. How would the steam be eliminated
 21 from --
 22 A. With a heat exchanger.
 23 Q. Let me. If steam came into the container --
 24 A. The steam enters in the container, goes in
 25 these four pipes. In this phase we were using only

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1 four pipes. In some other phases we use also the other
 2 pipes. In this moment we were at the end of the job.
 3 We were -- we had in operation only the four pipes. So
 4 the steam -- then the steam exited from the container
 5 inside a pipe, inside a system of pipe, and run through
 6 the place where the heat exchanger was. The heat
 7 exchanger exchanged heat between air and steam and cool
 8 and the steam.
 9 Q. Is it the other side -- then if I'm looking
 10 at Exhibit 17, is where the heat -- is where the steam
 11 is exiting this container somewhere on the other side
 12 of those pipes?
 13 A. You -- you -- you can see because this
 14 photography does not take the area where there was the
 15 bypass.
 16 Q. There was a bypass?
 17 A. Yes, sir.
 18 Q. Where would that --
 19 A. Between the number 17 and the number 16, you
 20 have a hole. So the number 16 is not a continuation of
 21 the 17 because if I look at the 17 and I look at the
 22 16, I have -- first I have to put the 17, and then I
 23 have to put the 16 because, as you can see, the 17 has
 24 the left side that is the end -- the left end of the
 25 container -- looking at the container from the point of

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1 observation of this photography while the photograph in
 2 number 16 shows us the right end of the container.
 3 Q. Uh-huh.
 4 A. But attention, between the 17 and the 16,
 5 there is a piece of plant that has not been
 6 photographed, you understand.
 7 Q. I understand.
 8 A. In that area there was the bypass.
 9 Q. Okay. And I think we actually -- that's not
 10 for this picture -- I've got pictures down the road,
 11 but I just want to ask this before we take a break.
 12 A. No. The number 18, you have to put the
 13 number 18 to follow the logic at the left --
 14 MR. ANNESSER: Dr. Rossi, there is no
 15 question.
 16 THE WITNESS: You are right and I am stupid.
 17 I am very, very stupid. I continue to make the
 18 same mistake, and I don't know why.
 19 MR. PACE: Dr. Rossi, I'm just going to stop
 20 you so that we can get to this and take a quick
 21 break. Let me just do this. Exhibit 18.
 22 (Thereupon, Photograph was marked for
 23 identification as Defendant's Exhibit 18.)
 24 THE WITNESS: Okay.
 25 BY MR. PACE:

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1 Q. When we look at Exhibit 17, we can see in
 2 the far left side tubing.
 3 A. Exactly. There --
 4 Q. Exhibit 18 -- let me do this.
 5 A. Sorry.
 6 Q. Exhibit 18 is, in fact, the tubing that we
 7 see on the far left in Exhibit 17?
 8 A. You are correct.
 9 Q. So that was the point you were just making.
 10 A. Yes.
 11 Q. This tubing is for inserting water, correct?
 12 A. No.
 13 Q. Okay. So what is it for inserting?
 14 A. Nothing.
 15 Q. Nothing. So these tubes -- who put these
 16 tubes in?
 17 A. When you say tubes, you mean these hoses?
 18 Q. Yes, sir.
 19 A. Because if you say tube, I think to the
 20 steam.
 21 Q. Correct. I'm sorry. Let me use the phrase
 22 you are using. Hoses.
 23 A. The hoses are emergency hoses connected with
 24 the hydraulic, the hydraulic center of the factory in
 25 case of overheating. We never use them in all the year

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1 A. Yes, sir.
 2 Q. -- you would look at the numbers on -- for
 3 what? You would look at the number for the flow meter?
 4 A. Yes.
 5 Q. And you would write that down?
 6 A. Yes.
 7 Q. And you maintain that record?
 8 A. Yes.
 9 Q. And then you don't really look at a thermal
 10 couple, right? Would you look at the computer? How do
 11 you know what's on the thermal couple?
 12 A. Because there was a manual instrument to
 13 read the thermal -- to read the thermal couple.
 14 Q. Okay.
 15 A. And so I just looked at it and wrote down
 16 the number.
 17 Q. And so that's a hand-held device, right?
 18 A. Yes, sir.
 19 Q. And you would write down that number and you
 20 kept that log?
 21 A. Yes.
 22 Q. And then there's a -- there's a pressure
 23 meter. Is it called --
 24 A. Yes, the manometer.
 25 Q. How many of those existed?

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1 A. Two.
 2 Q. Two. And did you ever take readings from
 3 the pressure meters?
 4 A. Yes, now and again also there. But I did
 5 not write down because it was pretty much constant.
 6 The pressure did not change basically, so I did not
 7 take record. I don't remember if I put also the --
 8 also the pressure or not, but you will see. If you
 9 show me my blog I can tell you. I don't remember.
 10 Q. So there's a book that has this that would
 11 have -- let me see if I can. Thank you, sir. I'm
 12 going to mark this as Exhibit 19.
 13 (Thereupon, Spreadsheet was marked for
 14 identification as Defendant's Exhibit 19.)
 15 THE WITNESS: Thank you.
 16 BY MR. PACE:
 17 Q. This is a document that you produced in
 18 discovery or that your lawyers produced in discovery.
 19 Is this --
 20 MR. ANNESSER: Are you sure we produced
 21 this?
 22 MR. PACE: You did.
 23 MR. ANNESSER: I don't see a Bates number on
 24 it. That's why I asked.
 25 MR. PACE: You produced this and made a

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1 file. You didn't put a number on it. In fact, I
 2 think Chris is going to have to contact you guys
 3 or we'll talk about it afterwards because I think
 4 part of it is corrupted. But we'll talk to
 5 Dr. Rossi and find out if that's right or not
 6 because it might not be. That's what we are about
 7 to find out.
 8 THE WITNESS: I don't -- which is your
 9 question?
 10 BY MR. PACE:
 11 Q. Do you recognize this spreadsheet?
 12 A. I am very sorry. No, I don't.
 13 Q. Okay.
 14 A. I don't. It is not mine.
 15 Q. Do you know whether Fulvio Fabiani tracked
 16 when the -- when different parts of the plant were
 17 working or not working or had to be shut down for short
 18 periods?
 19 A. I don't know exactly what Fulvio Fabiani was
 20 making because he worked for Industrial Heat, by the
 21 way. And he also had the task from Industrial Heat to
 22 help me if I had the troubles with electric stuff, but
 23 I know nothing about this work of his.
 24 Q. Let me make sure I'm clear. What we are
 25 looking at here on Exhibit 19 is a spreadsheet that

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1 contains certain data information. This is not your
 2 log of the information you collected?
 3 A. It's nothing to do with it, no.
 4 MR. ANNESSER: Object to the form.
 5 BY MR. PACE:
 6 Q. And you don't know about -- there's also
 7 comments here about when different units in the plant
 8 were started or stopped?
 9 A. I don't remember. I don't remember this
 10 events because, you know, we had a lot of event there.
 11 I don't remember.
 12 Q. Okay. Let me ask you, did you maintain any
 13 log or record of when units, when E-Cat units at the
 14 plant were operating or not operating?
 15 A. I did, yes.
 16 Q. You did?
 17 A. Yes.
 18 Q. How was that maintained?
 19 A. Manually by me. I did it manually. When
 20 such events -- this is the log I was talking before to
 21 you.
 22 Q. I'm sorry. You just said exhibit -- were
 23 you talking about this -- it's a handwritten log?
 24 A. Yes.
 25 Q. Okay. And in that handwritten log, if there

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1 steam from the --
 2 A. Which one, Counselor?
 3 Q. Actually, all three show the same pipe,
 4 correct?
 5 A. No because --
 6 Q. They are different angles?
 7 A. -- here is also another one.
 8 Q. Let me do it -- I appreciate that. In fact,
 9 same thing on number 25 if you look at the bottom. In
 10 24, 25 and 26 --
 11 A. 24, 25, and 26 they have the common
 12 denominator that is the steam pipe.
 13 Q. And that's the silver encased piping?
 14 A. It is correct.
 15 Q. And that was designed to carry the steam
 16 from the plant over to the JM Products container?
 17 A. Yes.
 18 THE VIDEOGRAPHER: We are at 7 minutes, sir.
 19 BY MR. PACE:
 20 Q. And this pipe has been -- I'm sorry?
 21 A. It's okay.
 22 Q. This piping has now been taken down at the
 23 Doral warehouse, correct?
 24 A. Yes.
 25 Q. Who took it down?

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1 A. I did.
 2 Q. When?
 3 A. After the test, after the sealing of the
 4 test.
 5 Q. Do you know -- was it immediately after, if
 6 you know?
 7 A. I don't remember, but I --
 8 Q. Who assisted?
 9 A. Sorry.
 10 Q. Did anyone assist you in taking down the
 11 piping?
 12 A. Can you repeat the question.
 13 Q. Yes. It's kind of the last question. Did
 14 anyone assist you in taking down the piping?
 15 A. Yes.
 16 Q. Who?
 17 A. Contractors.
 18 Q. Do you know their names?
 19 A. No.
 20 MR. PACE: I think I've run out of time.
 21 THE VIDEOGRAPHER: Here marks the end of
 22 videotape number eight and the deposition. We are
 23 going off the record at 7:25 p.m.
 24 (Thereupon, the taking of the deposition was
 25 concluded at 7:25 p.m. Signature and
 formalities were not waived.)

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1 RE : ROSSI v DARDEN
 DEPO OF: ANDREA ROSSI
 2 TAKEN : 2-23-17
 3
 4 EXCEPT FOR ANY CORRECTIONS
 MADE ON THE ERRATA SHEET BY
 5 ME, I CERTIFY THIS IS A TRUE
 AND ACCURATE TRANSCRIPT.
 6 FURTHER DEPONENT SAYETH NOT.
 7

 8 ANDREA ROSSI
 9
 10 STATE OF FLORIDA)
) SS:
 11 COUNTY OF)
 12
 13 Sworn and subscribed to before me this
 14 _____ day of _____ 2017.
 15 PERSONALLY KNOWN _____ OR I.D. _____
 16
 17
 18 Notary Public in and for
 the State of Florida at Large.
 19
 20
 21 My commission expires:
 22
 23
 24
 25


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1 ERRATA SHEET
 2 RE : ROSSI v DARDEN
 DEPO OF: ANDREA ROSSI
 3 TAKEN : 2-23-17
 4 DO NOT WRITE ON TRANSCRIPT, ENTER ANY CHANGES HERE
 5 Page #| Line #| Change | Reason
 6 _____|_____|_____ | _____
 7 _____|_____|_____ | _____
 8 _____|_____|_____ | _____
 9 _____|_____|_____ | _____
 10 _____|_____|_____ | _____
 11 _____|_____|_____ | _____
 12 _____|_____|_____ | _____
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 16 _____|_____|_____ | _____
 17 _____|_____|_____ | _____
 18 _____|_____|_____ | _____
 19 _____|_____|_____ | _____
 20 _____|_____|_____ | _____
 21 State of Florida)
 County of)
 22
 Under penalties of perjury, I declare that I have
 23 read by deposition transcript, and it is true and
 correct subject to any changes in form or
 24 substance entered here.


 25 Date ANDREA ROSSI

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1 CERTIFICATE OF OATH OF WITNESS
 2
 3 STATE OF FLORIDA
 SS:
 4 COUNTY OF MIAMI-DADE
 5
 6
 7 I, JANET BALDAUF, Registered Professional
 8 Reporter, Florida Professional Reporter and Notary
 9 Public in and for the State of Florida at Large,
 10 certify that the witness, ANDREA ROSSI, personally
 11 appeared before me on 2-23-17 and was duly sworn by
 12 me.
 13 WITNESS my hand and official seal this
 14 23rd day of February 2017.
 15
 16

 17
 18 JANET BALDAUF, RPR, FPR
 Notary Public
 State of Florida at Large
 19
 20 Notary # FF208072
 21 My Commission Expires: 3-31-2019
 22
 23
 24
 25

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1 REPORTER'S DEPOSITION CERTIFICATE
 2
 3 I, JANET BALDAUF, Registered Professional
 4 Reporter and Florida Professional Reporter, certify
 5 that I was authorized to and did stenographically
 6 report the deposition of ANDREA ROSSI, the witness
 7 herein on 2-23-17; that a review of the transcript
 8 was requested; that the foregoing pages numbered
 9 from 1 to 296 inclusive is a true and complete
 10 record of my stenographic notes of the deposition by
 11 said witness; and that this computer-assisted
 12 transcript was prepared under my supervision.
 13 I further certify that I am not a
 14 relative, employee, attorney or counsel of any of
 15 the parties, nor am I a relative or employee of any
 16 of the parties' attorney or counsel connected with
 17 the action.
 18 DATED this 23rd day of February 2017.
 19
 20

 21
 22 JANET BALDAUF
 Florida Professional Reporter
 Registered Professional Reporter
 23
 24
 25

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1 VERITEXT LEGAL SOLUTIONS
 One Biscayne Tower, Suite 2250
 2 Two South Biscayne Boulevard
 Miami, Florida 33131
 3 (305) 376-8800
 4
 _____, 2017
 5
 6 ANDREA ROSSI
 c/o JOHN W. ANNESSER, ESQUIRE
 Perlman Bajandas Yevoli & Albright, P.L.
 7 283 Catalonia Avenue, Suite 200
 Coral Gables, Florida 33134
 8
 9 RE : ROSSI v DARDEN
 10 DEPO OF: ANDREA ROSSI
 TAKEN : 2-23-17
 11 READ & SIGN BY: Days
 Attn: ANDREA ROSSI:
 12
 13 This letter is to advise you that the transcript
 of the deposition listed above is completed and
 is available for reading and signing.
 14
 15 PLEASE CALL THE ABOVE NUMBER TO MAKE AN APPOINTMENT to
 come to the Veritext office closest to you to read and
 sign the transcript. Our office hours are from 8:30
 16 a.m. to 4:30 p.m., Monday through Friday.
 17 IN THE EVENT OTHER ARRANGEMENTS ARE MADE, please send
 us a list of any and all corrections, signed and
 18 notarized, noting page and line numbers and the reason
 for such changes, so we can furnish all counsel with a
 19 copy of same. If the reading and signing has not been
 completed prior to the referenced date, we shall
 20 conclude that you have waived the reading and signing
 of the deposition
 21 transcript. Your prompt attention to this matter is
 appreciated.
 22
 23 Sincerely,
 24 JANET BALDAUF, RPR, FPR
 25 cc: Counsel of Record

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1 VERITEXT LEGAL SOLUTIONS
 One Biscayne Tower, Suite 2250
 2 Two South Biscayne Boulevard
 Miami, Florida 33131
 3 (305) 376-8800
 4
 _____, 2017
 5
 6 CHRISTOPHER R.J. PACE, ESQUIRE
 Jones Day
 7 600 Brickell Avenue, Suite 3300
 Miami, Florida 33131
 8
 9 RE : ROSSI v DARDEN
 DEPO OF: ANDREA ROSSI
 TAKEN : 2-23-17
 10 READ & SIGN BY: 30 Days
 11
 Dear Counsel:
 12
 13 The original transcript of the deposition listed
 above is enclosed for your file. The witness
 14 did not waive reading and signing and has been
 sent a letter notifying them to come in and read
 15 and sign their deposition transcript.
 16 The witness will be provided a copy of their
 deposition transcript for reading in our office
 17 should they come in to review the transcript, and
 we will forward to you any corrections made by
 18 the witness at that time, along with an original
 signature page which should be attached to the
 19 original transcript which is in your possession.
 20
 21 Sincerely,
 22
 23 JANET BALDAUF, RPR, FPR
 24
 25

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.

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