

**AFFIDAVIT OF JOSEPH R. LAPINSKAS**

I, Joseph R. Lapinskas, being first duly sworn on oath, state that if called upon as a witness, I would be competent to testify as to the following:

1. I started at Purdue University as an undergraduate student in 2000. My senior year at Purdue University, I took a class with Professor Rusi Taleyarkhan ("Dr. Taleyarkhan") and enjoyed the class so much that I decided to pursue my master's degree under Dr.

Taleyarkhan after graduation. I graduated with a Bachelor of Science in Nuclear Engineering in May of 2004. I attained my master's degree in December 2006 under the direction of Dr. Taleyarkhan. Since January of 2007, I have been pursuing my Ph.D under the guidance of Dr. Taleyarkhan.

2. My experience with Dr. Taleyarkhan inside and outside the lab is that everyone that works for him has been very happy and that he is very supportive. Dr. Taleyarkhan is intent on teaching his students the best way he can and ensures that they learn something from his teachings. He never requires us (his students) to do anything we do not feel comfortable with.

3. I have been asked to discuss my knowledge of Adam Butt ("Butt") and his participation in his Nuclear Engineering and Design ("NED") paper and the NURETH-II paper he co-authored along with Dr. Yiban Xu ("Xu"). I never knew Adam Butt to be unhappy about his co-authorship of the NED or NURETH -11 papers. He never expressed to me any bad feelings about his co-authorship on those papers during the time I worked with him in Dr. Taleyarkhan's lab. I know that Butt worked quite hand-in-hand with Xu on sonofusion studies, including computer modeling of the sonofusion chamber during 2005. Apparently this work was also done as part of his thesis.

4. My impression was that Butt was quite excited about traveling to France to present his paper at the NURETH-II conference and was unable to attend due to passport or visa problems. During the Summer of 2005, there was a press release on the experiments he and Xu had conducted. Butt seemed fine and was not distraught when the press took pictures of him and Dr. Xu for the press release in the lab.

5. I had heard from other sources at the time that while Adam Butt was finishing his master's thesis, he spoke with Dr. Tsoukalas and there was a rumor that he got pushed through his thesis faster than he should have. I understand that Dr. Tsoukalas was asking him questions, trying to get him to say that Dr. Taleyarkhan told him to do something with regard to co-authorship of the paper, and tried to get Butt to write something down and say that Dr. Taleyarkhan forced him to be a co-author. I do not know any more specifics about that, other than it was something that I had heard at the time in the Fall of 2005 before Butt defended his thesis in December 2005. Based on what I had heard, I can't remember if Dr. Tsoukalas met with Butt on more than one occasion, but I understand that the meeting(s) with Dr. Tsoukalas helped to expedite his thesis in December 2005.

6. I attended Butt's thesis defense in December 2005 along with Dr. Taleyarkhan, Dr. Tsoukalas, Dr. Revankar, and two other professors. I felt it very unusual that the head at the time of the School of Nuclear Engineering showed up for the defense of his thesis. In my experience, it is unusual for the head of the department to show up at a thesis defense unless the head is a member of the defense committee. To my knowledge Dr. Tsoukalas was not part of Butt's thesis defense committee. Dr. Tsoukalas left during the middle of Butt's defense which is also unusual in my experience.

7. With regard to Dr. Taleyarkhan's ability to teach and his scholarship and his role as a mentor for his students, Dr. Taleyarkhan excelled at being a great professor. I attended the class during the first semester that he taught at Purdue and he did very well. His biggest concern was always for his students to learn the material. He was very understanding and even outside class would spend time with the students to make sure they understood the materials. On two occasions (two semesters) I worked as a grader for Dr. Taleyarkhan's 'Introduction to Nuclear Engineering' course. He would always ask me how the students were doing and analyzed what they had problems with so that he could make the class better. I felt he devoted a substantial amount of time to ensure that his students learned as opposed to the students just doing the work and not learning anything. This is a great quality that I observed in Dr. Taleyarkhan, and one that I cannot say was present in Dr. Tsoukalas.

8. I find Dr. Taleyarkhan to be an excellent professor, which is why I decided to work with him in his research. His mentorship, research excellence, and concern for his students are second to none in the School of Nuclear Engineering, as far as I am concerned. I am not just saying this because I am working under him for my Ph.D currently. I had not planned to continue on to Ph.D work but after finishing my master's degree I felt that I had an excellent opportunity in continuing my education with Dr. Taleyarkhan.

9. On the other hand, I cannot say the same in my experiences with Dr. Tsoukalas. In my opinion, Dr. Tsoukalas is not trustworthy at all. I have taken two courses with him and he would often show up 20-30 minutes late, and half the time he would have his post-doc teach the courses. I did not learn anything in the courses I took with Dr. Tsoukalas. At one point in his class, I remember the students had to do presentations and I sat behind him while the presentations were going on in the class. The entire time students did the presentations, he was

using his laptop to surf the internet, not paying attention to the presentations. At this point I lost a lot of respect for Dr. Tsoukalas.

10. In my experience and interaction with Adam Butt, I do not believe there was any influence for him to be forced to be a co-author of either the NED or NURETH-II paper, in my opinion. If he was ever uncomfortable with being a co-author, I believe he would have told me or said something about it. I do not believe that Dr. Taleyarkhan influenced him in any way to be a co-author on the NED or NURETH -11 papers.

11. I also do not believe that Dr. Xu forced Butt to be a co-author on the papers either. Xu and Butt worked hand-in-hand. Plus, I can't see it happening that Dr. Xu would force somebody to be a co-author in a wrongful manner. Dr. Xu is another trustworthy person and one of the nicest persons I have ever known. He is always in the lab, always helping students, and it is not his character at all to force someone unduly to be a co-author.

12. Last year, Xu had mentioned that Dr. Taleyarkhan requested character letters concerning the investigation into him at Purdue University. Xu basically said that if anyone would like to write a character letter about Dr. Taleyarkhan they should send it in to him. I wrote a letter on behalf of Dr. Taleyarkhan which supported his character and research integrity. I did this because I don't believe that Dr. Taleyarkhan has done anything wrong with regard to his research. I voluntarily wrote that letter and I am voluntarily submitting this testimony.

13. It is ridiculous to say that Dr. Taleyarkhan influenced me, and for that matter any other student, to write positive character letters on his behalf. First of all, that didn't happen. Secondly, everyone was asked to write voluntarily about the character of Dr. Taleyarkhan, whether that was positive or negative. No one was influenced by grades or his professorship status to write those testimonials one way or the other. I wrote what I wrote and I am saying

what I am saying here based on my own free will and did not have any undue influence from anyone, including Dr. Taleyarkhan, in testifying as I have in the letters that I wrote and in this testimony.



JOSEPH R. LAPINSKAS

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