A. And that was in 1985.

Q. Okay. Now, you had a --

A. Right before the fire -- this was the heartbreak. The fire was a heartbreak, but the real heartbreak is we had beautiful proprietary --

Q. Okay. Let me ask you about that. What documents would you have had or did you have in the -- in your facility that burned in 1985?

A. We would have had copies of purchase orders. That -- that would have been it. Sales -- sales orders and purchase orders.

Q. Did you have samples of any products?

A. We would have had samples of products, yes.

Q. Were there samples of --

A. There should have been -- I mean, typically there would have been samples of products.

Q. Okay. Would there have been documents from the years prior when you were buying the base fabric from Vertipile and transfer printed on it?

A. Yes. Yes. Yes.

Q. Would there have been any samples from that time period?

A. I would expect there should have

been -- there would have been.

Q. Would there have been production documents of the production of a transfer printed flocked fabric with a dark-pigmented adhesive?

A. Very possibly, although sometimes we didn't make a great effort. We kept totals. I don't know how many real production documents we would have -- we would have kept.

Q. Would there have been sales documents of --

A. Sales documents.

Q. Let me -- let me -- let me just finish my question. Would there have been sales documents of transfer printed flocked fabrics with dark-pigmented adhesives?

A. Yes.

Q. When you were manufacturing transfer printed flocked fabric with dark-pigmented adhesives in the early '80s with Vertipile's product, what pressures approximately were you transfer printing at?

A. 25, 30 pounds.

Q. Is that 25 to 30 pounds per square inch?

A. It could have been 20 or 30. Once we

CERTIFICATE OF REPORTER

I, Cindy A. Hayden, Registered Professional Reporter and Notary Public for the State of North Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 6th day of October, 2003 at Cabarrus County, North Carolina.

Cindy A. Hayden

Cindy A. Hayden, RMR, CRR
My Commission expires
April 7, 2007

EXHIBIT ZZ

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION, Plaintiff, V. MICROFIBRES, INC., Defendant.	Civil Action No. 3:02 CV 1267 (AVC)

DEPOSITION OF
PETER J. HAUSER, Ph.D.

At Raleigh, North Carolina
September 16, 2003
9:59 a.m.
Reported by: Susanne M. Newman

COPY

don't remember if this has anything to do with it or not, other than the fact that they both say Rosenthal dated in '79 that they came at the same time. But I really don't, I really don't recall how I determined that this was published in 1990.

Q. Looking at Exhibit 14, Dr. Hauser.

A. Um-hmm.

Q. On page 2, second paragraph under the title, Do You Need Special Effects.

A. Um-hmm.

Q. Did you see that?

A. Yeah.

Q. You see it discloses transfer printing?

A. Yes, I do.

Q. Okay. And that's discussing transfer printing flocked fabric?

A. Yes.

Q. If you can look at page 11 of Exhibit 14, under the heading, Flocked Adhesives, do you see where it indicates that a flocked adhesive can be pigmented?

A. I presume you're talking about this second paragraph?

Q. Right. Would you agree with me that on page 11

under, Flocked Adhesives, this document teaches pigmenting the adhesive --

A. Um-hmm.

Q. -- in the manufacture of flocked fabric?

A. It's a possibility, yes. It says it's a possibility.

Q. So it, this document teaches pigmenting the adhesive in the manufacture of flocked fabric, correct?

A. Yeah.

Q. If you can turn to page 13, Dr. Hauser. Under the heading of, Finishing Flocked Fabrics, in the subheading, Printing, do you agree with me that this document teaches transfer printing of flocked fabric?

A. That's right.

Q. So you agree with me that this document, Exhibit 14, teaches transfer printing of flocked fabric with a pigmented adhesive?

MR. CANNING: Objection.

WITNESS: No, I would not agree with that statement.

Q. If you can take a look at page 6, figure 2.

A. Yeah.
Q. You see the block at the top of the page -- strike that. Do you agree with me that figure 2 outlines the manufacture of a flocked fabric?
A. Yes, it does.
Q. From the preparation of the substrate down to the finishing processes?
A. Yes.
Q. Looking in figure 2 at the adhesive preparation box, do you see that?
A. Um-hmm, yes.
Q. In looking at that figure in conjunction with page 11?
A. Um-hmm.
Q. If you can turn to page 11, also.
A. (Witness complies.)
Q. That's where we discussed that under the heading, Flocked Adhesives, it discloses pigmenting the adhesive?
A. Right.
Q. So that would be under the adhesive preparation, correct, in figure 2?
MR. CANNING: Objection.

WITNESS: It could be there.
Q. Okay. And under the box down at the bottom, do you see where it says, Flocked fabric finishing?
A. That's correct. Yes, I do.
Q. If you can turn to page 13, under the heading, Finishing Flocked Fabrics, again, you see under the subheading, Printing, that it discusses and teaches transfer printing flocked fabrics, true?
A. Yes, it does say that.
Q. Okay. And flocked fabric finishing, you would agree with me, refers to the finishing flocked fabrics discussed on page 13?
MR. CANNING: Objection.
WITNESS: It could. I don't know the intention of the person who wrote this thing, but it's possible.
Q. Let's take a look at page 9. See the heading, Flocked Substrates, at the top of the page?
A. Oh, yeah. Flocking Substrates. Yes.
Q. And that discusses different flocked substrates?
A. Yes. Substrates being the material that you, the flock is applied to, yes.
Q. Okay. In looking back at figure 2 on page 6,

that's at the top of the page, the box at the top of the page, substrate preparation, true? Does that correspond to flocking substrates?

MR. CANNING: Objection.

WITNESS: It's possible that it refers to that, but again, I don't know the intention of the author.

Q. Okay. Well, let's look at the next heading on page 11. The next heading after Flocking Substrates is Flock Adhesives, correct, on page 11?

A. Correct.

Q. Looking at figure 2, the next box below Substrate Preparation is Adhesive Preparation, true?

A. Correct.

Q. Looking again at page 11 below Flock Adhesives, that heading, there's a heading, Flocking Fibers. Do you see that?

A. Yes.

Q. And then there's a discussion on page 11 through the top of page 12 having to do with flock itself and the flock preparation, true?

A. Correct.

Q. Now let's take a look back at figure 2. The third

box down from the top is Flock Preparation, true?

A. Yes, that's correct.

Q. And the boxes on the left-hand side after Flock Preparation in Exhibit 2 that are entitled Flock Application, Excess Flock Removal, Flock Reorientation, Drying and Curing, and Brush Operation all have to do with the flock process?

MR. CANNING: Objection.

WITNESS: It appears it may. Again, not knowing the intention of the author.

Q. And the next heading, which is on page 13 which follows the discussion of flock preparation, is Finishing Flocked Fabrics.

A. Correct.

Q. Do you see that?

A. Um-hmm.

Q. And the last box on figure 2 is finished flock -- Flocked Fabric Finishing?

A. Right.

Q. So do you see a correlation between this document, how it's set out, and figure 2?

MR. CANNING: Objection.

WITNESS: There's a possibility. Again, not

knowing the intention of the author, it's possible there's a correlation.

Q. Putting aside the intention of the author, do you see a logical correlation between the headings in this document, Exhibit 14, and figure 2?

MR. CANNING: Objection.

WITNESS: Yes.

Q. So looking at figure 2, the adhesive preparation could include pigmenting the adhesive, as described on page 11, and the box of flocked fabric finishing included on figure 2 could include the transfer printing that's described on page 13, true?

MR. CANNING: Objection.

WITNESS: Possible.

Q. Possible? Yes or no?

MR. CANNING: Objection.

WITNESS: Yes, it could.

Q. This figure -- strike that. This Exhibit 14 is a document that you have produced today?

A. Yes.

Q. If you can take a look at this next set of documents. Is that part of the documents that you've produced today, Dr. Hauser?

STATE OF NORTH CAROLINA

COUNTY OF DURHAM

C E R T I F I C A T E

I, Susanne M. Newman, Court Reporter and Notary Public, do hereby certify that the above-named witness was duly affirmed by me prior to the taking of the foregoing deposition; and that said deposition was taken and transcribed under my supervision; and that the foregoing pages, inclusive, constitute a true and accurate transcription of the testimony of the witness.

I do further certify that the persons were present as stated in the caption.

I do further certify that I am not of counsel for or in the employment of any of the parties to this action, nor am I interested in the results of this action.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 22nd day of September, 2003.

Susanne M. Newman, Notary Public

My commission expires: September 24, 2005

EXHIBIT
AAA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF CONNECTICUT

No. 3:02 CV 1267 (AVC)

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CERTIFIED COPY

INTERMARK FABRIC CORPORATION

VS

MICROFIBRES, INC.

Deposition of: RONALD S. PERRY, Ph.D., taken pursuant to the Federal Rules of Civil Procedure before Barbara L. Murphy, Licensed Shorthand Reporter, License No. 305 and Notary Public within and for the State of Connecticut, held at the offices of Cantor Colburn, 55 Griffin Road, Bloomfield, Connecticut on September 29, 2003 commencing at 9:50 a.m.