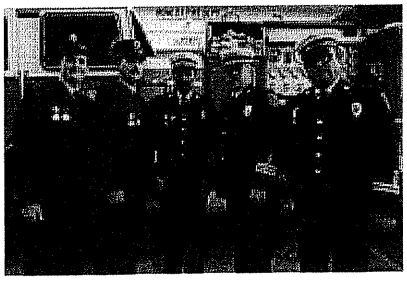
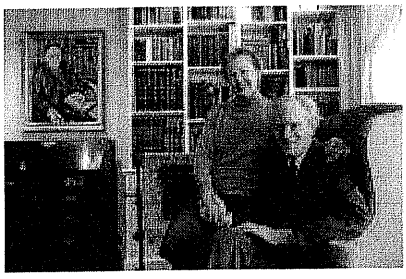


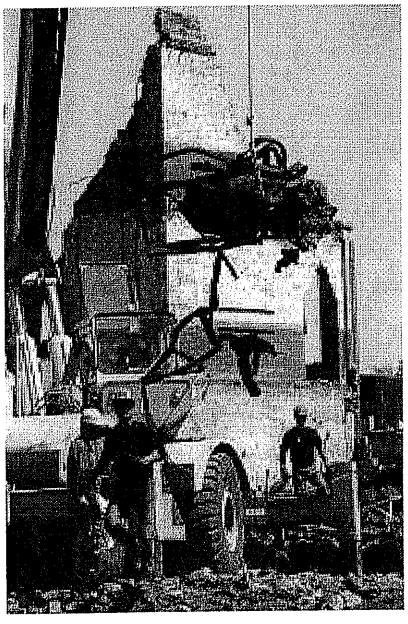
1/9/96 LOWELL - Malden Mills owner Aaron Feuerstein, after he was honored at the Massachusetts State House by Gov. William Weld for his efforts to support his workers displaced in the Malden Mills fire and commitment to rebuild the textile factory. AP PHOTO BY STEVE SENNE



6/11/96 ROWLEY - (l-r) James Chadbourne, John Lucey, Chief Scott McKenzie, Deputy Chief Ron Merry, Capt. Don Merry, were some of those honored for the Malden Mills effort. GLOBE STAFF PHOTO BY JIM WILSON



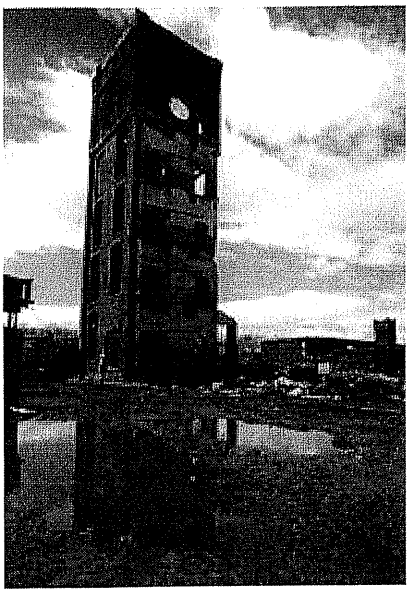
9/4/96 Aaron Feuerstein, owner of New England's last great textile mill, Malden Mills, and his wife, Louise, in their Brookline home. GLOBE STAFF PHOTO BY PAM BERRY.



6/6/96 LAWRENCE- Workers remove debris from the area where investigators believe the fire started at Malden Mills. GLOBE STAFF PHOTO BY BILL GREENE.



6/3/96 Quality control manager Greg Bousquest watches the rebuilding process of Malden Mills. GLOBE STAFF PHOTO BY BILL GREENE.



4/11/96 METHUEN - Reconstruction work begins around the tower of Malden Mills. GLOBE STAFF PHOTO

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION, Plaintiff, vs. MICROFIBRES, INC., Defendant.	Case No. 302 CV 1267 AVC

DEPOSITION OF PETER M. HADLEY, a witness called on behalf of the Defendant, taken pursuant to the Federal Rules of Civil Procedure before Carol H. Kusinitz, Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, at the Offices of Hinckley, Allen & Snyder LLP, 28 State Street, Boston, Massachusetts, on Thursday, July 31, 2003, commencing at 1:35 p.m.

PRESENT:

Cantor Colburn LLP
(by Charles F. O'Brien, Esq.)
55 Griffin Road South, Bloomfield, CT 06002, for the Plaintiff.

Hinckley, Allen & Snyder LLP
(by William R. Grimm, Esq.)
1500 Fleet Center, Providence, RI 02903-2393, for the Defendant.

* * * *

vice-president of research and development.

Q. And what was Mustapha Nour's connection to the questions that Mr. Lucchesi was asking you?

A. Mustapha Nour was the print division manager for Malden Mills, and they were developing paper transfer and print products, Malden was developing, in the early '80s.

Q. What was Ami Inbal's connection to the questions that Mr. Lucchesi asked of you?

A. He was flock division manager at that time.

Q. Also at Malden?

A. Yes, Malden Mills.

Q. What was Fred Black's connection to the questions that Mr. Lucchesi asked of you?

A. Fred Black was flock division chemist and production manager.

Q. Also at Malden Mills?

A. Yes.

Q. Did Mr. Lucchesi in this conversation ask you for any documentation?

A. Yes, he did. He asked for documentation, do we have any. I said I'd check, but those files -- Claremont Flock had a fire in '96, and sprinklers went off and a lot of the old files were

ruined. So we threw them out, discarded them.

Q. What documentation did Mr. Lucchesi ask you for?

A. If there was any production reports on paper transfer printing for Vertipile or for the contract customers.

Q. Was he any more specific than that in his request for documents?

A. No.

Q. After you received the request from Mr. Lucchesi for production records of Vertipile and Claremont and Claremont's customers to the extent they existed, did you search for such records?

A. Yes, I did. I went through my personal files. I found some coated samples with pigmented adhesive, but couldn't determine what date they were. And I didn't find any backup production reports -- I didn't find any production reports through that whole period.

Q. Were the coated samples with pigmented adhesives that you found transfer printed?

A. I don't know. They were gray goods, meaning natural in color, with black adhesive.

Q. So the samples you found had no printing on

COMMONWEALTH OF MASSACHUSETTS)

SUFFOLK, SS.)

I, Carol H. Kusinitz, Registered Professional Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that there came before me on the 31st day of July, 2003, at 1:35 p.m., the person hereinbefore named, who was by me duly sworn to testify to the truth and nothing but the truth of his knowledge touching and concerning the matters in controversy in this cause; that he was thereupon examined upon his oath, and his examination reduced to typewriting under my direction; and that 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 hereunto set my hand and affixed my notarial seal this 5th day of August, 2003.

Notary Public

My commission expires 6/2/06