EXHIBIT C

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF CONNECTICUT

COPY

INTERMARK FABRIC CORPORATION, Plaintiff, vs. MICROFIBRES, INC., Defendant.	Civil Action No. 3:02 CV 1267

Deposition of WAYNE TURCOTTE, taken pursuant to the Federal Rules of Civil Procedure, at the law offices of Cantor Colburn LLP, 55 Griffin Road South, Bloomfield, Connecticut, before Jenny L. Albert, License #00207, a Registered Professional Reporter and Notary Public in and for the State of Connecticut, on Wednesday, May 21, 2003, at 9:41 a.m.

MR. CASS: Objection.

A. Yes.

Q. Thank you. In the past, has Intermark assisted transfer printers with their transfer printing operations on the Frosty product?

A. Yes.

Q. And what assistance has Intermark offered to transfer printers related to their transfer printing the Frosty product?

A. Just explain to them which direction the fabric should be running, what temperatures the fabric should be running, different pressures that can be used, brushing, brushing post and after.

Q. And what is the -- what is Intermark's purpose in offering such assistance to transfer printers to transfer print the Frosty product?

A. We offer assistance to transfer printers on all of our products, not just the Frosty, and obviously, the better job they do, the more we sell.

Q. Does or has Intermark advised customers and potential customers that Frosty is suitable for transfer printing?

A. Yes.

Q. And in connection with that, those statements, does Intermark identify any particular

characteristics of Frosty which make it suitable for transfer printing?

A. Frosty -- the Frosty product lends itself to darker colors and it lends itself to less grim through.

Q. And in connection with your sales efforts, do you identify those characteristics of the Frosty product when talking with the transfer printers?

A. Please say that again.

MR. GRIMM: Would you read that back.

(Last question read back)

A. Yes.

Q. Do you identify any or does Intermark identify any other characteristic of Frosty that makes it suitable for transfer printing beyond the two you mentioned?

A. Nope.

Q. Does Intermark have any promotional materials it gives to prospective customers concerning its product line?

A. Promotional? I mean, free samples to try?

Q. What sort of promotional materials might you give to a potential customer at a sales call?

A. Show them our various product line, show them our natural flock and our Frosty line. We would show them various embossings. They would -- what usually

would happen is they'll ask for samples of several products and try it on their particular transfer print machines.

Q. Okay.

A. We do the same thing for wet printers and piece dyers also.

Q. Are there any written pieces that you hand out to prospective customers concerning the product line beyond the samples that you show and the pieces of clothe that you give?

A. Occasionally, a person who hasn't handled any flock, I've handed out written information on what the general idea is of printing -- transfer printing flock, the temperature people normally run, the pressure people normally run. I might give them a suggestion as to where to buy good -- what we consider to be good transfer print paper.

Q. So in connection with your sales efforts related to Frosty, you sometimes hand out written instructions concerning the transfer print process; is that correct?

A. Yes. We've done that in the past.

MR. GRIMM: Why don't you mark that.

(September 21, 1991 letter with attached drawing marked Defendant's Exhibit 9 for

various PMD entity relationships?

A. Susan and Bill.

Q. What's Intermark's relationship with Imex?

A. Imex? May I see? Hmm, I don't recall. I don't recall.

Q. What is Intermark's relationship with Spandauer Velours?

A. He's a customer.

Q. And who within Intermark is responsible for that relationship?

A. Bill Lucchesi.

Q. Who's the contact at Spandauer?

A. Gunter Walter.

Q. Has Intermark sold Frosty to Spandauer Velour?

A. Yes.

Q. Does Spandauer Velour have transfer printing capability?

A. Yes.

Q. At the time Intermark sold Frosty to Spandauer Velour, was it aware that Spandauer planned to transfer print?

A. Yes.

Q. During what period of time has Intermark sold Frosty to Spandauer Velour for transfer printing?