EXHIBIT H

COPY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF CONNECTICUT

Case Number: 3:02-CV-1267 (AVC)

- -

INTERMARK FABRIC CORPORATION,

Plaintiff,

vs.

MICROFIBRES, INC.,

Defendant.

- -

DEPOSITION OF STEVEN ROSENTHAL

July 9, 2003

I was NROTC out of Tufts, so I was a Naval officer from '63 to '65. And I came to work at American Finish the summer of 1965. And during that time my primary responsibility was adhesives going into textiles, primarily flocking.

Q. Did you work in the -- when you say "adhesives," what were your responsibilities in terms of adhesives?

A. I did just about everything. I worked in the lab. I did a little time in the factory, primarily sales, eventually president of the company.

Q. What types of parameters were you working in in adhesives?

A. Water-based acrylic -- for flocking?

Q. Uh-huh.

A. Water-based acrylic adhesives.

Q. Would there be pigmentations or other components added to them?

A. Yes.

Q. When you worked for American Finish, what years were those?

A. 1960 -- the summer of 1965 until

the summer of 2002.

Q. And when you say you were working in pigments, what type of pigments would you be working with?

A. They were water-based dispersions that we mixed into the flocking adhesives.

Q. Would there be different colors?

A. Yes, there's a full pallet of colors.

Q. And what would be -- when you say "full pallet of colors," what would be the full pallet, let's say?

A. From black to white, to red, orange, yellow, green, blue and violet.

Q. Let me go back to the sixties when you started at American Finish. Were those colors still used as early as the 1960's?

A. I would say that we sold pigmented adhesives -- let's see. I started in '65. We were selling pigmented adhesives before 1972 for sure.

Q. And who were your customers? What types of customers would you have in selling your pigmented adhesives?

A. People who -- the pigmented

adhesives went into people who were doing flocking. Are you asking specific customers names?

Q. Tell me the types of customers you would sell to in the sixties.

A. People who made flocked fabrics using adhesives and flock to make the fabrics. I mean -- to me it's an obvious -- I understand you have to be specific, but to me it's an obvious question, so I don't understand.

Q. The reason I'm asking, sir, is that it may be that your testimony may be read to the jury, and I have to ask some basic questions --

A. I understand.

Q. -- so that they understand.

Now, when we say "people that would be using flocked fabrics," what types of entities or corporations would be using flocked fabrics?

A. Well, manufacturing -- we would sell to manufacturers, not to end users of fabrics. We would sell to people who would buy adhesives from us, substrate from someone

else, and flock from a third party. And they would put those three components together to make a finished product called a flocked fabric.

Q. And just so I'm clear. And from there where does the flocked fabric go?

A. Flocked fabrics are used in upholstery, they're used in packaging, they're used in apparel, a variety of end uses.

Q. Are there any processes imposed on the flocked fabric after the flocked fabric is made?

A. I think you're asking me if there's postfinishing?

Q. Yes. Thank you. Can you tell me what type of postfinishing happens to flocked fabrics?

A. Lots of different things. Everything from dying, where you change the color, to printing on it, both wet printing and sublistatic printing, texturizing, heat setting, lots of different things.

Q. What about transfer printing?

A. I said sublistatic printing is

A. It's a notice from the American Flock Association to all our members advising that there was literature, brochures, and directories available at the office.

Q. The brochures, could you describe the brochures that were available?

A. Well, reading directly from the text, the Design with Flock in Mind Brochure is one that's offered. The directory, which is a member of all the -- a list of all the members, and stickers, member of the American Flock Association stickers are available.

Q. The Design of Flock in Mind Brochure, did you participate in that brochure in any way?

A. I was the editor.

Q. You were the editor. When did that project start?

A. I would say '85, '86, thereabouts.

Q. Now, when you say you were the editor, were you a member of the American Flock Association at that time?

A. Yes. I was -- I'm a member of the board from day one, and I was head of the promotions committee and the technical

committee, so that's how I came to be the editor.

Q. Did you work with anybody in terms of developing the brochure?

A. Yes. It was definitely a group write project. I created nothing in the brochure. I made sure syntax was correct. I created flow. But as far as actual technical information, with the exception of a small section on adhesives, and even that was a group effort, the entire brochure was put together by members of the association.

Q. Do you remember which members participated in putting together the brochure?

A. Well, we had assistance from Joachim Muller, from EFT Consultants in Germany. He had written quite a bit on flocking, and allowed us to use his writings and the sketches from his -- the chapter he wrote in a book that was published about flocking. We had Herman Shaw from Spectro was there, Peter Hadley had some input, Carl, a retired Claremont employee whose name I can't remember at the moment. I just went

blank on it. There were probably ten plus people in my office, had a variety of different meetings over the years as we worked on it.

Q. So it started sometime in 1985 and --

A. Somewhere around '85, '86. I'm not sure of the exact year it started. I know we were working on it in '87, '88, '89, and we had finished brochures available in '90, as indicated by the flier that was handed out by the association.

Q. It says -- there's some underlining here on the letter, it says -- could you read what it says, that underlined --

A. "Remember that these were designed so you could put your business card and your companies product information into the slots of the inside back cover."

Q. And I think it also indicates -- and so in the individual brochure, were there slots so you could slide your business card in?

A. Yes. It was fancy expensive piece that we started with, white with a red design

with flock in mind, logo going diagonally across the front of it.

Q. Were these brochures distributed to the membership?

A. The membership was allowed to have some copies, and because they were very expensive, we sold them at cost of $2 a piece to the membership to give out.

Q. So how many copies went to the membership?

A. Well, we allowed five copies to each member at no charge. I don't know what the membership was specifically at that time. I would guess minimum 20 business members. Could be more. I'm not sure.

Q. And you indicated that Mr. Shaw had some participation in the brochure?

A. Yes, he was one of the people that I remember.

Q. Do you recall what portions of the brochure he participated in?

A. I can't say specifically what -- the way we did it was the people brought information together. We produced the brochure in rough copy. We would send it

back out. People would review the entire brochure, make their comments, send it back rewrite it again. That's why it took so long, group write becomes a nightmare.

Q. Let me ask you, have you seen this document before?

A. Yes. This is the version of that same brochure that we used to give out to schools and to lesser quality leads at trade shows because this is an inexpensive version versus the expensive version.

Q. Is there any difference in the texts between inexpensive --

MR. CASS: Let's mark that as the next exhibit for a second. For the record, Exhibit Number 3.

(Rosenthal Exhibit 3: Marked for identification.)

BY MR. CASS:

Q. So Exhibit 3 is a less expensive copy of the brochure that was sent out in October of 1990?

A. Yes.

Q. I'd like to direct your attention to the discussion on adhesives, if I could,