EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION	:	
	:	
v.	:	C.A. No. 3:02-CV-1267 (AVC)
	:	
MICROFIBRES, INC.	:	

FIRST AMENDED AND SUPPLEMENTAL ANSWERS OF DEFENDANT, MICROFIBRES, INC. TO PLAINTIFF INTERMARK FABRIC CORPORATION'S FIRST SET OF INTERROGATORIES

Defendant Microfibres, Inc. hereby amends and supplements its responses to Intermark Fabric Corporation's First Set of Interrogatories as follows:

INTERROGATORY NO. 5

With respect to the conception, reduction to practice, first public use or disclosure and first sale or offer for sale of the invention of the '021 patent:

a. identify the date and location of each such event;
b. describe, in detail, each such event;
c. identify all persons most knowledgeable about each such event; and
d. identify of all documents relating to each such event.

ANSWER NO. 5

a.-b. The invention was first conceived early 1992 and a patent application was filed on July 31, 1992. It was first shown in Europe on August 1, 1992. The first sales occurred in August of 1992 in Canada.

c. James R. McCulloch
Microfibres, Inc.
One Moshassuck Street
Pawtucket, RI 02862

William F. Laird
Microfibres, Inc.
One Moshassuck Street
Pawtucket, RI 02862

d. Please see the patent application and invention documents which Microfibres will make available in response to Intermark's First Request for Production.

AMENDED AND SUPPLEMENTAL ANSWER NO. 5

a.-b. The invention was first conceived no later than March 21, 1991. This answer has been amended given the discovery of minutes of a meeting between William Laird, James McCulloch, and others. Copies of those minutes are being produced.

MICROFIBRES, INC.

By: _____

SUBSCRIBED AND SWORN TO before me this 2 day of June, 2003.

_____
Notary Public

AS TO OBJECTIONS:

_____
Brent R. Canning, Esq. (CT 23991)
William R. Grimm, Esq.
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CERTIFICATION

Charles F. O'Brien, Esq.
Cantor Colburn LLP
55 Griffin Road South
Bloomfield, CT 06002

I certify that I faxed and mailed a copy of the foregoing First Amended And Supplemental Responses to Intermark's First Request for Production to counsel of record, as above, on June 2, 2003.

#547407

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION	:	
	:	
	:	
v.	:	C.A. No. 3:02-CV-1267 (AVC)
	:	
MICROFIBRES, INC.	:	

ANSWERS OF DEFENDANT, MICROFIBRES, INC. TO PLAINTIFF INTERMARK FABRIC CORPORATION'S SECOND SET OF INTERROGATORIES

INTERROGATORY NO. 1

Please identify and explain in full detail each and every reason why James McCulloch and/or Microfibres failed to disclose to the United States Patent Office during the prosecution of the '021 patent, the following:

(A) the relationship between Microfibres and Intermark that commenced in 1991 concerning the supply of flock by Microfibres to Intermark ; and

(B) the existence of flocked fabric with dark pigmented adhesives manufactured by Intermark, such as Intermark's Frosty product.

ANSWER NO. 1

Microfibres, Inc. objects to this Interrogatory to the extent it asks for Microfibres' work product or legal strategy during the prosecution of the '021 Patent. Microfibres also objects to the Interrogatory as argumentative. Subject to these objections, the relationship between Microfibres and Intermark was not material or relevant to the patent prosecution. Microfibres did disclose to the Patent Office the existence of dark pigmented adhesives

used in the production of flocked fabric. The prior use of pigmented adhesives is disclosed in the '021 Patent.

MICROFIBRES, INC.

By: James R Fulks

SUBSCRIBED AND SWORN TO before me this 26 day of June, 2003.

Alice A Krawiec
Notary Public

AS TO OBJECTIONS:

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CERTIFICATION

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I certify that I faxed and mailed a copy of the foregoing Responses to Intermark's First Request for Production to counsel of record, as above, on June 27, 2003.



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