EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION,

Plaintiff,

vs. CIVIL ACTION NO. 3:02-CV-1267 (AVC)

MICROFIBRES, INC.,

Defendant.

COPY

DEPOSITION OF: CHARLES L. BUNCH
DATE: September 22, 2003
TIME: 11:02 a.m.
LOCATION: Womble, Carlyle, Sandridge & Rice
301 S. College Street
Charlotte, North Carolina
TAKEN BY: Counsel for the Defendant
REPORTED BY: CINDY A. HAYDEN, RMR, CRR

ROBERTS & KIDWELL, INC.
Charlotte, NC (843) 722-8414
Columbia, SC (803) 731-5224
Greenville, SC (864) 234-7030
Charlotte, NC (704) 537-3919

I didn't show it -- I didn't let them see it.

Q. Okay. But even the stuff that you did show them, I assume you expected them to maintain secrecy concerning that, correct?

MR. O'BRIEN: Objection to form.

A. Not necessarily. I -- I took the -- I took the approach that, if they saw it, they would disseminate the information. If we thought it was -- was something proprietary, we didn't show it to them. We didn't see this as being proprietary at the time.

Q. Okay. I understand, but I assume that there are processes and products that Bunch manufactured that it did not consider proprietary that it also did not want disseminated to the public or competitors?

A. If we thought it was proprietary, it wasn't disseminated, or we tried -- tried not to disseminate it. If it wasn't proprietary, then -- then the -- the -- the suppliers had -- had access to it because they were -- they were helpful. I mean, we were learning from the suppliers, and if we kept too much secret, we couldn't learn.

Q. Do you have any documents to demonstrate that Bunch Fabrics was transfer

printing on flocked fabric made with color adhesive during the 1980s?

A. No. All of our records were -- pertaining to this were destroyed in '85.

Q. Do you have any documents demonstrating that Bunch was transfer printing on flocked fabric with dark adhesive prior to July 31, 1991?

A. No.

Q. Do you have any samples of flocked fabric manufactured with a colored adhesive and transfer printed by Bunch Fabrics that was created prior to July 31, 1991?

A. No.

Q. Do you have any tangible evidence to corroborate your testimony that Bunch Fabrics was transfer printing on flocked fabric with colored adhesives during the 1980s?

A. Tangible, meaning a sample, no.

Q. Tangible meaning anything that is -- can be held or --

A. We had a 40,000 square foot plant. Duke Power had a substation next door. They were doing work during the day of the 18th at the substation. At about 8:00 that evening, a million volt line coming from the power station fell across