EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

INTERMARK FABRIC CORPORATION, Plaintiff vs. MICROFIBRES, INC., Defendant	No. 3:02 CV 1267 (AVC)

CERTIFIED COPY

DEPOSITION OF MOUSTAFA T. NOUR

Deposition taken at the offices of AVICORE Reporting, 25 Lowell Street, Suite #405, Manchester, New Hampshire, on Wednesday, September 17, 2003, commencing at 8:30 a.m.

Court Reporter:

Lori Bonafide, CSR
New Hampshire CSR No. 90 (RSA 331-B)

AVICORE Reporting
Certified Videographers & Court Reporters
25 Lowell Street, Suite 405
P. O. Box 3337
Manchester, NH 03105-3337
VIDEOCONFERENCING
(603) 666-4100
Toll Free (888) 212-2072
Fax (603) 895-8781
Email: AvicRptg@aol.com

Q Okay.
A It's not a belief, it's a fact.
Q Do you have any documented -- strike that.
Do you have any documents or fabric samples that would demonstrate your belief?
A No, sir, because when I left Malden, I didn't take anything with me.
Q Okay. You didn't take any?
A It's all here.
Q All in your head?
A Yes.
Q You mentioned Fred Black before is the man that knows it all; is that right?
A Because he was in charge of the total flocking process from getting the substraight, applying adhesive, applying the nylon flock on it or nylon fiber on it, and he was there for quite some time. I mean, I know him from the '70s, and he stayed, actually, even after the fire for a while.
Q Was he in charge of transfer printing as well?
A Not directly, no, not directly.
Q And who was in charge of transfer

LASER BOND FORM A ® PENGAD • 1-800-631-6989 • www.pengad.com

late '80s?

A The biggest one, actually, would be Rohm and Haas, Rohm Tech. I would say Rohm and Haas was the biggest one, but there are quite a few.

Q What was the other company?

A Rohm Tech was late, actually.

Q But you believe Rohm and Haas was supplying --

A Rohm and Haas was the biggest one and the second biggest one was Boliver Industry, (phonteic) which became after that Malten Fire Coal, (phonetic) the people famous for the --

Q Um-hum.

A Shuttle problem.

Q You said something earlier, I want to make sure I understood.

A Sure.

Q You were talking about printing, transfer printing dark blue. I thought you said that you would use a light blue adhesive; is that correct?

A Yes.

Q Was Malden Mills using only light colored adhesive, light colored?

LASER BOND FORM A PENGAD • 1-800-631-6989 • www.pengad.com

A Most of it. Actually, with the heat transfer, you have to be like light to medium. With the wet printing we used dark, but we printed them with pigment colors like white or bright colors.

Q So in the late '80s, you were using light to medium colored adhesive; is that right?

A For heat transfer. For wet printing we use even dark adhesive to get a certain look.

Q But do you recall Malden Mills using a dark color adhesive in connection with transfer printing?

A I wouldn't say, no. I would say no.

Q You don't recall?

A You see, the problem when we start with the adhesive itself and say, for example, you put a black in it, okay. It is a black adhesive, but the moment you apply, and it's a thin film, it's gray, it's dark gray, okay.

Q I'm not -- unfortunately, I don't have the background.

A I understand.

Q Hopefully, you can explain it to me.

A Yes.

LASER BOND FORM A PENGAD • 1-800-631-6989 • www.pengad.com