IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BALDWIN GRAPHIC SYSTEMS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 06-77 (JJF)
	)	
BBA NONWOVENS SIMPSONVILLE INC., REEMAY INC., and BBA HOLDINGS INC.,	)	
	)	
Defendants.	)	

REPLY OF PLAINTIFF BALDWIN GRAPHIC SYSTEMS, INC. TO DEFENDANTS' COUNTERCLAIMS

Plaintiff, Baldwin Graphic Systems, Inc. ("Baldwin"), incorporates by reference all the allegations in its previous Complaint and for its Reply to Defendants BBA Nonwovens Simpsonville Inc.'s, and Reemay Inc.'s Counterclaims, alleges as follows:

1. Baldwin admits it is the owner of United States Patent Nos. Re 35,976 and 5,974,976. To the extent a response is required to the remainder of paragraph 1, Baldwin denies the allegations.

2. On information and belief, Baldwin admits that counterclaim plaintiff BBA Nonwovens Simpsonville Inc. is a Delaware corporation, and counterclaim plaintiff, Reemay Inc., is a South Carolina corporation.

3. Baldwin admits it is a Delaware corporation having its principal place of business at 2 Trap Falls Road, Suite 402, Shelton CT. 06484.

4. Baldwin admits that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§1331 and 1338(a). No response is required to the remainder of the allegations stated in paragraph 4 because it purports to state a conclusion of law. To the extent a response is required, Baldwin denies the allegations.

5. Baldwin admits it has submitted to jurisdiction of this Court by the filing of this action.

6. Baldwin admits venue is proper in this district, but denies the remainder of paragraph 6.

7. Baldwin admits that an actual controversy exists between BBA Nonwovens Simpsonville Inc., and Reemay Inc. and Baldwin concerning the RE 35,976 and 5,974,976 patents, which dispute requires resolution by this Court. Baldwin reiterates and incorporates by reference its allegations in its Complaint.

8. Baldwin denies allegations of paragraph 8.

9. Baldwin denies allegations of paragraph 9.

10. Baldwin denies that BBA Nonwovens Simpsonville Inc. and Reemay Inc. are entitled to any relief requested in their Answer to Complaint, Affirmative Defenses and Counterclaim.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

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April 24, 2006

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CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on April 24, 2006 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Kevin M. Baird
CONNOLLY BOVE LODGE & HUTZ, LLP

I also certify that copies were caused to be served on April 24, 2006 upon the following in the manner indicated:

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