IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BALDWIN GRAPHIC SYSTEMS, INC., Plaintiff, v. BBA NONWOVENS SIMPSONVILLE INC. and REEMAY INC., Defendants.	)	C.A. No. 06-077-JJF

STIPULATION AND PROPOSED ORDER TO EXTEND DATES SET FORTH IN THE JUNE 26, 2006 SCHEDULING ORDER

It is hereby stipulated by Plaintiff Baldwin Graphic Systems, Inc. ("Baldwin") and Defendants BBA Nonwovens Simpsonville Inc. and Reemay Inc. (collectively "BBA"), subject to the approval of the Court, that the deadlines set forth in the Scheduling Order dated June 26, 2006 (D.I. 19) are extended by approximately three months, as set forth in the attached Proposed Amended Scheduling Order.[1]

The reasons for this stipulation are as follows. First, the parties have discussed settlement and are continuing to explore a possible business resolution. As such, in the interest of judicial economy and financial efficiency, the parties believe that the extension of time is appropriate.[2]

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1 The parties also stipulate, subject to the approval of the Court, that with respect to written discovery already served, but not yet answered, the deadline for written responses will be extended until December 29, 2006.

2 The parties also stipulate, subject to the approval of the Court, that should the Defendants later move to stay the litigation on the basis that the United States Patent and Trademark Office reexamines one or more of the patents in suit, then Plaintiff will not oppose such a motion on the basis that Plaintiff has been prejudiced by the passage of time during the period beginning on August 3, 2006 and concluding upon written notice of either party. (cont'd)

Second, Plaintiff is scheduled to begin trial on October 10, 2006 in a separate action that involves one of the patents-in-suit in the present matter. The events of this impending trial may affect some of the issues to be addressed in this case.

As set forth in the attached certification under Local Rule 16.5, counsel for Baldwin and BBA have sent a copy of this request to their respective clients.

Dated: September 20, 2006

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(cont'd

The Plaintiff reserves its right to oppose the Defendants' motion to stay on other grounds including delays prior to this stipulation and any delay after written notice is given as provided above terminating the stay.

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SO ORDERED this _____ day of _____, 2006.

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The Honorable Joseph J. Farnan, Jr.

Statement under Local Rule 16.5

Counsel for Plaintiff Baldwin Graphic Systems, Inc. hereby certifies that a copy of this request has been sent to Baldwin Graphic Systems, Inc.

/s/ Jack B. Blumenfeld (#1014)

Counsel for Defendants BBA Nonwovens Simpsonville Inc. and Reemay Inc. hereby certifies that a copy of this request has been sent to BBA Nonwovens Simpsonville Inc. and Reemay Inc.

/s/ Francis DiGiovanni (#3189)

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BALDWIN GRAPHIC SYSTEMS, INC., Plaintiff, v. BBA NONWOVENS SIMPSONVILLE INC. and REEMAY INC., Defendants.	C.A. No. 06-077-JJF

[PROPOSED] AMENDED SCHEDULING ORDER

IT IS ORDERED that:

1. **Joinder of other Parties.** All motions to join other parties shall be filed on or before **April 13, 2007**.

2. **Discovery.**

(a) Exchange and completion of contention interrogatories, identification of fact witnesses and document production shall be commenced so as to be completed by **December 29, 2006**.

(b) Maximum of **25** interrogatories, including contention interrogatories, for each side.

(c) Maximum of **50** requests for admissions by each side.

(d) Maximum of **12** depositions by plaintiff(s) and **12** by defendant(s), excluding expert depositions. Depositions shall not commence until the discovery required by paragraph 3(a, b and c) is completed.

(e) Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the party bearing the burden of proof on an issue by **October 15, 2007**, with rebuttal reports due **November 16, 2007**.

(f) Any party desiring to depose an expert witness shall notice and complete said deposition no later than thirty (30) days from receipt of said expert's report, unless otherwise agreed in writing by the parties or ordered by the Court.

3. **Discovery Disputes.**

(a) A party seeking discovery which the opposing party refuses to provide shall file a motion (no brief) pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 37.1. Said motion shall not exceed a total of four (4) pages and must specify that the filing is pursuant to the Discovery Dispute procedures provided in this paragraph. An answer to the Rule 37 motion, not exceeding four (4) pages, shall be filed within five (5) days of service of the motion. No reply is permitted.

(b) All papers shall set forth in a plain and concise manner the issue(s) in dispute, the party's position on the issue(s), and the reasons for the party's position.

(c) Upon receipt of the Answer, the movant shall notify Chambers by e-mail at jjf_civil@ded.uscourts.gov that the dispute is ready for decision.

(d) Upon receipt of the movant's e-mail, the Court will determine whether a conference is necessary and advise the parties accordingly.

(e) There is no limit on the number of Rule 37 motions a party may file, unless otherwise ordered by the Court.

4. **Amendment of the Pleadings**. All motions to amend the pleadings shall be filed on or before **January 19, 2007**.

5. **Case Dispositive Motions.** Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before **December 14, 2007**. Briefing shall be pursuant to D. Del. LR 7.1.2. No case dispositive motion may be filed more than ten (10) days from the above date without leave of the Court. The Court will issue a separate Order regarding procedures for filing summary judgment motions.

6. **Markman**. A Markman Hearing will be held on **July 18, 2007**. Briefing on the claim construction issues shall be completed at least ten (10) business days prior to the hearing. The Court, after reviewing the briefing, will allocate time to the parties for the hearing.

7. **Application by Motion.**

(a) Any application to the Court shall be by written motion filed with the Clerk of the Court in compliance with the Federal Rules of Civil Procedure and the Local Rules of Civil Practice for the United States District Court for the District of Delaware (Amended Effective January 1, 1995). Any non-dispositive motion shall contain the statement required by D. Del. LR 7.1.1. Parties may file stipulated and unopposed Orders with the Clerk of the Court for the Court's review and signing. The Court will not consider applications and requests submitted by letter or in a form other than a motion.

(b) No facsimile transmissions will be accepted.

(c) No telephone calls shall be made to Chambers.

(d) Any party with a true emergency matter requiring the assistance of the Court shall e-mail Chambers at: jjf_civil@ded.uscourts.gov. The e-mail shall provide a short statement describing the emergency.

8. **Pretrial Conference and Trial.**

(a) A Pretrial Conference will be held on **Thursday, March 6, 2008**. The Federal Rules of Civil Procedure and the Local Rules of Civil Practice for the United States District Court for the District of Delaware (Amended Effective January 1, 1995) shall govern the pretrial conference;

(b) Trial will be scheduled at the Pretrial Conference to commence within 120 days of the pretrial conference. Counsel should be available during the 120 day period for trial.

SO ORDERED this _____ day of _____, 2006.

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United States District Court Judge