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

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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Dated: September 20, 2006

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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 25 day of September, 2006.

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)