IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BALDWIN GRAPHIC SYSTEMS, INC., Plaintiff,	)	
v.	)	Civil Action No. 06-077-JJF
FIBERWEB SIMPSONVILLE, INC., and FIBERWEB, INC., Defendants.	)	

DECLARATION OF KEVIN DILL IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER OR STAY THIS ACTION

I, Kevin Dill, declare as follows:

1. I am currently Product Director - Industrial Converted Products at Fiberweb, Inc.

2. Upon information and belief there are no important witnesses or documents located within the District of Delaware.

3. Defendant Fiberweb, Inc. is a South Carolina Corporation with a principal place of business in Tennessee.

4. Defendant Fiberweb Simpsonville, Inc. is a Delaware Corporation with a principal place of business in South Carolina.

5. Fiberweb's[1] operations are multinational, but its relevant activity is concentrated in South Carolina. Fiberweb performs its most significant research, development, manufacturing and sales functions relating to the accused products in its South Carolina facilities.

6. Fiberweb sold the accused products to at least Brown Printing Company and American Litho, Inc., both of Illinois, prior to Baldwin filing its Complaint in this action.

7. Fiberweb has sold the allegedly infringing products (Elixir®) in many locations, including Illinois.

8. Fiberweb has not sold any product accused of infringement by Baldwin in the District of Delaware.

9. None of Fiberweb's witnesses or relevant documents is located within the District of Delaware.

10. Prior to February 3, 2006, the day on which this litigation began, Fiberweb made at least two shipments of Elixir® to printers in Illinois.

11. These shipments totaled 15 cases, or 75 rolls, of Elixir®.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 13, 2007



Kevin Dill

[1] Defendants Fiberweb, Inc. and Fiberweb Simpsonville, Inc. are referred to collectively as "Fiberweb."

CERTIFICATE OF SERVICE

I, Francis DiGiovanni, Esq., hereby certify that on June 14, 2007, copies of the foregoing DECLARATION OF KEVIN DILL IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER OR STAY THIS ACTION were caused to be served upon the following:

BY HAND DELIVERY

Jack Blumenfeld, Esquire
Morris, Nichols, Arsht & Tunnell
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899

BY E-MAIL AND FEDERAL EXPRESS

Keith J. McWha, Esquire
Morgan & Finnegan
3 World Financial Center
New York, New York 10281-2101

/s/ Francis DiGiovanni
Francis DiGiovanni (#3189)

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