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 REBECCA MARJORIE ANNE HALFORD-HARRISON

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Dated: August 28, 2007

DECLARATION OF

REBECCA MARJORIE ANNE HALFORD-HARRISON

1. I, Rebecca Marjorie Anne Halford-Harrison, am a solicitor registered with the Law Society of England and Wales. I am a senior associate at K&L Gates, who are representing Fiberweb Plc in *Fiberweb Plc v Baldwin Graphic Systems Inc* (Claim No. HC-07-C01510), a case pending in the Patents Court, which is a court in the Chancery Division of the English High Court. I have responsibility for day to day conduct of the case.

Exchange between the parties

2. On 24 July 2007, K&L Gates, wrote to Baldwin Graphic System Inc's ("Baldwin") English attorneys, Mayer Brown Rowe & Maw ("Mayer Brown"), requesting approval of a draft consent order to a stay, a copy of which is attached at Exhibit RHH-1.

3. On 20 August 2007, Mayer Brown wrote to K&L Gates refusing to consent to the order for a stay (Exhibit RHH-2).

Practice of the English courts on applications

4. Under English court procedures, any application for an order of the court must be supported by reasonable grounds in fact or law why the court should exercise its discretion and grant the application requested.

5. If an application is made without reasonable grounds in fact or law, it would be expected that the English court would dismiss the application, would penalise the applicant by making an order for an award of costs against the applicant, possibly on an indemnity basis, and would criticise the applicant for having made the application. An award of costs includes attorneys' fees.

6. The English court rules stipulate that cases must be dealt with in a way that ensures compliance with the overriding objective of the procedural code, which includes, amongst other requirements, that the court (not the parties) actively manages cases to ensure they proceed quickly and efficiently and use the court resources appropriately. That means that making applications that are bound to fail is dissuaded. In effect, such applications are prevented.

Application to this case

7. In this instance, in view of Baldwin's refusal to consent to a stay of the English proceedings, there would be no reasonable grounds for the English Court to grant a stay until a decision of U.S. Federal Circuit. Therefore, any application would be bound to fail and Fiberweb Plc could be expected to be penalised on costs should it make such an application and to be criticised by the English court for having made the application.

8. That a U.S. order is conditioned upon a stay in the English court is not proper grounds for a stay of the English proceedings, most particularly because this concerns patents which are, by their nature, territorial. The ruling of a US court on a US patent has no effect on the ruling of an English court on an equivalent UK patent. The U.S. Federal Circuit decision will have no bearing on the English court proceedings. There are no other grounds upon which Fiberweb Plc could base an application for a stay.

9. In summary, in this case, only the consent of all parties to proceedings to a order for a stay would be likely to be considered persuasive to the English court. Without Baldwin's consent, an application to the English Court for a stay would be futile and would likely subject Fiberweb to an award of costs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 28th August 2007

EXHIBIT

RHH-1

K&L|GATES

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Direct fax +44 (0)20 7360 6412
Your ref 20532/07042657

By Fax and Post

24 July 2007

Dear Sirs

CLAIM NO. HC-07-C01510, FIBERWEB PLC -V- BALDWIN GRAPHIC SYSTEMS, INC

We refer to your letter of 23 July 2007.

1. The information which you request to be made openly available is and remains confidential in its entirety.

2. In relation to samples, we understand your client has samples already. Whilst we consider the Product Description is sufficient of itself for the purposes of determining non-infringement, we offered inspection, which you have refused. You have provided no reason why inspection is not sufficient.

Your delaying tactics come as little surprise, as pointed out in our letter of 6 July, and we note that you continue to attempt to delay matters without proper reason, particularly given your clear refusal of our offer of inspection.

Notwithstanding these points, you are aware that a conditional order for a stay has been ordered in the parallel US proceedings. That stay is conditional upon a stay in the UK action. We enclose a draft consent order for a stay. You will note that we have proposed a further extension to file your client's Defence to within 14 days of the Siebert decision being handed down. Kindly confirm your consent to the form of order. We will then make the necessary application.

Yours faithfully

K&L Gates

K&L Gates

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HC-07-C01510

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION
PATENTS COURT
BETWEEN:

FIBERWEB PLC

Claimant

-and-

BALDWIN GRAPHIC SYSTEMS, INC.
(a company incorporated in Connecticut USA)

Defendant

Draft/ORDER FOR STAY

UPON the application of the Claimant, dated [●] July 2007;

UPON the parties agreeing that this action be stayed on the following terms; and

UPON READING the documents recorded on the Court file as having been read,

BY CONSENT IT IS ORDERED THAT:

1. The action be stayed pending a decision in, or dismissal of, United States Court of Appeals for the Federal Circuit in *Baldwin Graphic Systems, Inc. v. Siebert, Inc.*, 07-1262 (Fed. Cir.) (D.I. 44).

2. The Claimant shall have permission to apply for a Case Management Conference immediately following the lifting of the stay.

3. The Defendant shall file its Defence within 14 days of the stay being lifted.

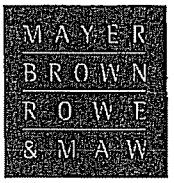
4. The parties have permission on three days' notice to apply for further directions and generally.

5. The costs of this application and the action are reserved.

Dated July 2007

EXHIBIT

RHH-2



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Kirkpatrick & Lockhart Preston Gates Ellis LLP
110 Cannon Street
London EC4N 6AR
FAO: Rebecca Halford-Harrison

20 August 2007

Your ref: NAD/RMH/6011615.0001
Our ref: 20532/07042657

Dear Sirs

Claim No. HC-07-C01510 Fiberweb Plc v Baldwin Graphic Systems, Inc

In your letter of 25 July 2007 you said that you noted that the judge in the parallel US proceedings ordered the parties to stay the UK proceedings, and asked our client to consent to such a stay. You also said in your letter of 26 July 2007 that you understood that it was agreed between our clients' respective US counsel that, in view of the US judge's ruling, it was appropriate to stay the UK proceedings.

Our client's understanding of the position is not as you set out in your letters and, having considered the overall circumstances, are not prepared to consent to a stay of the proceedings in the UK.

Yours faithfully

Mayer Brown Rowe & Maw LLP

Mayer, Brown, Rowe & Maw LLP

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37471579.1

CERTIFICATE OF SERVICE

I, Francis DiGiovanni, Esq., hereby certify that on August 28, 2007 copies of the foregoing **DECLARATION OF REBECCA MARJORIE ANNE HALFORD-HARRISON** were caused to be served upon the following:

BY HAND DELIVERY

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BY FACSIMILE AND FEDERAL EXPRESS

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/s/ Francis DiGiovanni
Francis DiGiovanni (#3189)