IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

PLAINTIFF'S NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(B)(6) DIRECTED TO DEFENDANTS

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), Baldwin Graphic Systems, Inc. ("Baldwin") will take the deposition of Defendants Fiberweb Simpsonville Inc. and Fiberweb, Inc. ("Fiberweb") by one or more of its officers, directors, managing agents or other persons who consent to testify on its behalf concerning the matters set forth in Exhibit A.

The deposition will take place at the offices of Kirkpatrick & Lockhart Preston Gates Ellis LLP, State Street Financial Center, One Lincoln Street, Boston, MA 02111 on November 7, 2007 at 9:30 a.m. The deposition will continue from day to day until concluded. The deposition will be recorded stenographically and may be videotaped. Fiberweb is requested to produce on or before the deposition for inspection and copying all documents or things referring or relating to the subject matter of Exhibit A to the extent they have not already been produced.

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/s/ Julia Heaney

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October 25, 2007
1295404

EXHIBIT A

1. Manufacturing process for Fiberweb's ELIXIR product.

2. Manufacturing process for Fiberweb's presaturated fabric cleaning roll.

3. Manufacturing of packaging for Fiberweb's ELIXIR product, including packaging of Fiberweb's presaturated fabric cleaning roll.

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on October 25, 2007 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:

Francis DiGiovanni
CONNOLLY BOVE LODGE & HUTZ, LLP

I also certify that copies were caused to be served on October 25, 2007 upon the following in the manner indicated:

BY EMAIL

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