**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF DELAWARE**

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

**DECLARATION OF JACKSON HO IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR *IN CAMERA* REVIEW AND TO COMPEL PRODUCTION OF DOCUMENTS**

I, Jackson Ho, am an attorney at Kirkpatrick & Lockhart, Preston, Gates, Ellis, LLP, counsel for Defendants in this action. I submit this exhibit declaration in connection with Defendants' Opposition to Plaintiff's Motion for *In Camera* Review and to Compel Production of Documents. Under penalty of perjury, I declare the following to be true to the best of my knowledge, information and belief.

1. Attached as Exhibit A is a true and correct copy of pages 64 to 69 of a transcript of Jon Howey's deposition which occurred on November 7, 2007.

2. Attached as Exhibit B is a true and correct copy of Fiberweb's updated privilege log provided to Baldwin on December 5, 2007.

3. Attached as Exhibit C is a true and correct copy of document number 80 of the privilege log bearing production number FW005005 to 005007.

4. Attached as Exhibit D is a true and correct copy of document number 81 of the privilege log bearing production number FW005132.

5. Attached as Exhibit E is a true and correct copy of document number 82 of the privilege log bearing production number FW017670.

6. Attached as Exhibit F is a true and correct copy of document number 86 of the privilege log bearing production number FW027459.

7. Attached as Exhibit G is a true and correct copy of document number 94 of the privilege log bearing production number FW027457.

8. Attached as Exhibit H is a true and correct copy of document number 96 of the privilege log bearing production number FW027082.

9. Attached as Exhibit I is a true and correct copy of document number 98 of the privilege log bearing production number FW028493.

10. Attached as Exhibit J is a true and correct copy of document number 109 of the privilege log bearing production number FW028792.

11. Attached as Exhibit K is a true and correct copy of document number 110 of the privilege log bearing production number FW023647.

12. Attached as Exhibit L is a true and correct copy of document number 113 of the privilege log bearing production number FW006413.

13. Attached as Exhibit M is a true and correct copy of document number 114 of the privilege log bearing production number FW006636.

Dated: January 9, 2008

Jackson Ho

# EXHIBIT A

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A. No.

Q. Okay, Mr. Howey, I'm giving you another exhibit. This exhibit I'm going to mark as PX-37.

(Exhibit No. PX-37 was marked for identification.)

Q. And PX-37 is a memo with your name on it, Mr. Howey. Jon A. Howey, Fiberweb, with the subject,

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MR. ZELIGER: Mr. McWha, I'm going to object to this document being used. It is an inadvertent production of attorney-work product information and request that it be recalled pursuant to Section 9.1 of the protective order.

MR. McWHA: Again, Baldwin objects to that and does not see that this document would be privileged in any manner, and asks under the protective order, under Sections 9.3 and 9.4, to continue questioning based on the protective order.

MR. ZELIGER: Well, I don't understand that. The protective order doesn't allow you to keep questioning on it. I will allow you to ask questions, voir dire type questions about the basis for our asserting that it is work product, but the protective order does not allow you to continue asking substantive questions on it.

It clearly states in Section 9.1 that once we request the return, it's returned until we meet and confer, perhaps involve the court.

MR. McWHA: Let me rephrase. That in terms of protective order, we will proceed with the voir dire questions and also ask for clarification from Fiberweb as to why this document is considered privileged.

MR. ZELIGER: Or work product.

MR. McWHA: Or work product. It is Baldwin's position that this is not work product or privileged, and at what time that the Court would determine that it is not work product, we reserve the right to come back and ask Mr. Howey further questions based upon this document.

MR. ZELIGER: I understand that. You are reserving your rights, and we are, too.

MR. SILVERMAN: And under Section 9.4, we'll hold these in custody until the matter is resolved.

MR. ZELIGER: That's not what Section 9.4 says.

MR. SILVERMAN: Well, that's how we interpret it.

MR. ZELIGER: How so?

MR. SILVERMAN: It says right here.

MR. ZELIGER: What does it say?

MR. SILVERMAN: Look at the last line.

MR. McWHA: Read into the record 9.4.

MR. SILVERMAN: "The nonproducing party shall not disclose the document for which the belated claim of immunity, privilege, or confidentiality is being made to any person, other than those persons who have had it in their possession, prior to receipt of notification from the producing party, until the expiration of the period for filing a motion with the court

identified in subparagraph 9.3 or, if a motion is submitted, until disposition of that motion. Upon being notified by the producing party pursuant to paragraph 9, counsel for the nonproducing party shall use his or her best efforts to retrieve all copies of the document at issue."

MR. ZELIGER: Yeah, so that doesn't -- that's a prohibition on doing anything with it. It does not give you permission to keep it in custody, and that stands in contrast to what it clearly says in Section 9.1 that says, "If a written claim of inadvertent production is made pursuant to this paragraph with respect to the information then in the custody of another party, upon receipt of such written notice such party promptly shall return to the claiming party or person that material and all copies or reproductions thereof that the receiving party is aware of." And I don't have ability sitting here to provide written notice, but just as we did yesterday, at the end of the day we will provide written notice.

MR. SILVERMAN: How about Section

9.3?

MR. ZELIGER: None of Sections 9.2, 3 or 4 provide an exception to the rule in 9.1 that says you must return it.

MR. McWHA: Well, we disagree. We think that the entire section should be read, and we can -- I understand that Fiberweb is preserving their rights. Baldwin is also preserving their rights regarding this document. We will proceed in terms of voir diring, and later on we can deal with the issues with the protective order on the document.

MR. ZELIGER: Okay, very well.

Q. (By Mr. McWha) Mr. Howey, the document in front of you, PX-37, entitled

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Do you have that document in front of you?

A. Yes.

Q. Do you have any recollection of that document?

MR. ZELIGER: You may answer that.

A. Yes.

Q. To the best of your ability, the recollection that you have, is this product, work product made by -- strike and rephrase.

To the best of your knowledge, the document in front of you, was that document authored by you and you alone?

MR. ZELIGER: You may answer that.

A. Yes.

MR. ZELIGER: May I ask a voir dire question?

Mr. Howey, was the document that's labeled PX-37 created at the request of counsel?

THE WITNESS: Yes.

Q. (Mr. McWha) A follow-up question. Mr. Howey, have you created similar documents in the past outside of the request of counsel?

A. No, not that I can recall.

Q. In development of your products such as the Elixir and the Elixir SF, would there be technical calculations similar to the calculations in PX-37 that you would perform in your development capacity?

A. No.

# EXHIBIT B

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**Baldwin v. BBA/Fiberweb Privilege Log**

| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 1. | 04/26/05 | Linker, Ron, Esq. | Howey, Jon | Haynes, Suzanne | | | Letter regarding freedom to practice study containing advice from counsel | AC/WP |
| 2. | | | | | | | Draft patent application for | AC |
| 3. | | | | | | | Draft patent application for | AC |
| 4. | 02/03/04 | Howey, Jon; Delgado, Emil | Counsel | | | | Invention disclosure statement | AC |
| 5. | | | | | | | Draft patent application for | AC |
| 6. | | | | | | | Draft patent application for | AC |
| 7. | | | | | | | Redlined draft patent application for | AC |
| 8. | | | | | | | Draft patent application for | AC |
| 9. | 04/07/05 | Howey, Jon | Linker, Ron, Esq. | Newkirk, David; Dill, Kevin | | | Letter regarding description of BBA premoistened blanket cleaning products | AC |
| 10. | 07/07/05 | Linker, Ron, Esq. | Lamkin, Karen, Esq. | | | | Email regarding suggested response to Baldwin patent letter | AC |
| 11. | 12/20/05 | Linker, Ron, Esq. | Howey, Jon | | | | Note regarding Elixir opinion letter | AC |
| 12. | 01/19/06 | Howey, Jon | Dill, Kevin | | | | Memo regarding Elixir patent update relaying advice from counsel | AC |
| 13. | 01/27/06 | Balts, Timothy | Petrice, Diane | Linker, Ron, Esq. | | | Letter enclosing patent application | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 14. | 04/06/05 | Howey, Jon | | | | | Handwritten notes regarding | AC |
| 15. | 12/20/05 | Howey, Jon | Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email requesting advice from counsel concerning patent application | AC |
| 16. | 12/19/05 | Howey, Jon | Linker, Ron, Esq.; Balts, Timothy | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Memo regarding response to first office action | AC |
| 17. | 12/19/05 | Howey, Jon | Linker, Ron, Esq.; Balts, Timothy | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email regarding rebuttal of office action | AC |
| 18. | 12/20/05 | Howey, Jon | Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email requesting advice from counsel concerning patent application | AC |
| 19. | 12/20/05 | Howey, Jon; Linker, Ron, Esq. | Briggs, James | Dill, Kevin; Cronin, Daniel; Haynes, Suzanne | | | Email thread communicating advice from counsel regarding | AC |
| 20. | 04/26/05 | Linker, Ron, Esq. | Howey, Jon | Haynes, Suzanne | | | Letter regarding freedom to practice study containing advice from counsel (duplicate of doc. #1) | AC/WP |
| 21. | 12/19/05 | Howey, Jon | Linker, Ron, Esq.; Balts, Timothy | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Memo regarding response to first office action | AC |
| 22. | 10/25/05 | Balts, Timothy | Haynes, Suzanne | Linker, Ron, Esq.; Thomasson, Mike; Howey, Jon | | | Letter containing advice from counsel regarding first office action | AC/WP |
| 23. | 01/19/06 | Howey, Jon | Dill, Kevin | Briggs, James; Petrice, Diane; Haynes, Suzanne | | | Email relaying advice from counsel regarding Elixir patent application | AC |
| 24. | 01/16/06 | Howey, Jon | Linker, Ron, Esq.; Balts, Timothy | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email thread requesting advice from counsel regarding patent application (with handwritten notes by Jon Howey) | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 25. | 11/30/05 | Balts, Timothy | Haynes, Suzanne | Linker, Ron, Esq. | | | Letter regarding Notice of Allowability reflecting advice from counsel | AC |
| 26. | 12/14/05 | Howey, Jon | Linker, Ron, Esq. | Haynes, Suzanne; Dill, Kevin | | | Email regarding office action requesting advice from counsel | AC |
| 27. | | | | | | | Draft patent application for | AC |
| 28. | | | | | | | Draft patent application for | AC |
| 29. | 01/19/06 | Howey, Jon | Dill, Kevin | Briggs, James; Petrice, Diane; Haynes, Suzanne | | | Email relaying advice from counsel regarding Elixir patent applications | AC |
| 30. | | | | | | | | AC |
| 31. | | | | | | | | AC |
| 32. | 01/19/06 | Howey, Jon | Dill, Kevin | Briggs, James; Petrice, Diane; Haynes, Suzanne | | | Email relaying advice from counsel regarding Elixir patent applications | AC |
| 33. | 05/03/05 | Howey, Jon | Thomas, Ed | Newkirk, Dave; Baker, Frank; Reeves, John; Dill, Kevin | | | Email discussing advice from counsel regarding possible Elixir litigation | AC/WP |
| 34. | 12/21/05 | Briggs, James | Gehring, Gara | Cronin, Daniel; Dill, Kevin; Howey, Jon | | | | AC/WP |
| 35. | 12/20/05 | Howey, Jon | Dill, Kevin; Briggs, James Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email thread communicating advice from counsel regarding patent application | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 36. | 07/11/01 | Linker, Ron, Esq. | Thress, Steve; Dill, Kevin | Lamkin, Karen, Esq.; Howey, Jon; Dill, Kevin; Miller, Bradley; McVey, Betty; Coslett, Andrew; Andes, Jeff; Duane, Larry | | | | AC |
| 37. | 02/20/02 | Howey, Jon | Linker, Ron, Esq. | Coslett, Andrew; Dill, Kevin; Thress, Steven | | | Email requesting advice from counsel regarding packaging concepts | AC |
| 38. | 09/20/02 | Linker, Ron, Esq. | Howey, Jon | Coslett, Andrew; Dill, Kevin; Haynes, Suzanne | | | Email thread regarding request for advice from counsel | AC/WP |
| 39. | 06/12/03 | Howey, Jon | Linker, Ron, Esq. | Dill, Kevin; Coslett, Andrew; Zimmerman, Harry; Haynes, Suzanne | | | Email concerning patent prosecution advice | AC |
| 40. | 04/07/05 | Howey, Jon | Linker, Ron, Esq. | Newkirk, Dave; Dill, Kevin | | | Email providing information requested by counsel with attachment regarding same | AC |
| 41. | 05/03/05 | Howey, Jon | Thomas, Ed | Newkirk, Dave; Baker, Frank; Reeves, John; Dill, Kevin | | | Email | AC/WP |
| 42. | 05/18/05 | Lamkin, Karen, Esq. | Reeves, John; Dill, Kevin | Thomas, Ed; Howey, Jon; Briggs, James; Davis, Keith; Haynes, Suzanne | | | Email thread containing advice from counsel regarding potential litigation | AC/WP |
| 43. | 05/24/05 | Howey, Jon | Lamkin, Karen, Esq. | Dill, Kevin; Newkirk, Dave | | | Email containing advice from counsel with attachment | AC |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 44. | 06/10/05 | Howey, Jon | Howard, Roy; Dill, Kevin | | | | Email thread attaching opinion of counsel | AC/WP |
| 45. | 07/07/05 | Lamkin, Karen, Esq. | Dill, Kevin; Reeves, John; Thomas, Ed; Howey, Jon; Briggs, James | | | | Email thread containing advice from counsel | AC |
| 46. | 07/07/05 | Lamkin, Karen, Esq. | Dill, Kevin; Reeves, John; Thomas, Ed; Howey, Jon; Briggs, James | | | | Email thread containing advice from counsel | AC |
| 47. | 12/19/05 | Howey, Jon | Linker, Ron, Esq.; Balts, Timothy | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email providing information regarding response to first office action to counsel | AC |
| 48. | 12/20/05 | Cronin, Daniel; Linker, Ron, Esq. | Howey, Jon; Briggs, James; Linker, Ron, Esq. | Dill, Kevin; Haynes, Suzanne | | | Email thread containing advice from counsel | AC |
| 49. | 06/29/01 | Thress, Steven | Howey, Jon; Lamkin, Karen, Esq. | Dill, Kevin; Miller, Bradley; McVey, Betty; Coslett, Andrew; Andes, Jeff; Duane, Larry | | | Email thread requesting advice from counsel regarding patent | AC |
| 50. | 04/08/02 | Thress, Steven | Dill, Kevin | | | | | AC/WP |
| 51. | 05/17/02 | Thress, Steven | Howard, Roy; Baumgartner, Michael; Gruber, E; Dill, Kevin | Lamkin, Karen, Esq.; Vandette, P. | | | | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 52. | 06/25/02 | Thress, Steven | Thomas, Ed; Lamkin, Karen, Esq.; Vandette, P.; Baumgartner, Michael; Gruber, E.; Dill, Kevin | Coslett, Andrew; Henning, Gregory | | | | AC |
| 53. | 08/06/02 | Howey, Jon | Dill Kevin | Thress, Steven; Coslett, Andrew | | | | AC |
| 54. | 09/19/02 | Howey, Jon | Linker, Ron, Esq. | Coslett, Andrew; Dill, Kevin; Haynes, Suzanne | | | Email requesting advice from counsel | AC |
| 55. | 12/06/02 | Howey, Jon | Thomas, Ed | Coslett, Andrew; Dill, Kevin; Thress, Steven; Siskind, David | | | | AC |
| 56. | 04/16/04 | Howey, Jon | Linker, Ron, Esq. | Haynes, Suzanne; Dill, Kevin; Christy, Kathi; Coslett, Andrew; Zimmerman, Harry | | | Email requesting advice from counsel regarding attached draft patent application | AC |
| 57. | 01/27/05 | Haynes, Suzanne; Linker, Ron, Esq. | Dill, Kevin | | | | Email thread containing advice from counsel regarding Elixir trademark | AC |
| 58. | 03/14/05 | Thomas, Ed | Howey, Jon | Newkirk, Dave; Dill, Kevin | | | Email thread discussing information for counsel regarding Elixir patent | AC |
| 59. | 03/15/05 | Howey, Jon | Thomas, Ed | Newkirk, Dave; Dill, Kevin | | | Email thread discussing information for counsel regarding Elixir patent | AC |
| 60. | 03/17/05 | Howey, Jon | Newkirk, Dave | Thomas, Ed; Dill, Kevin | | | Email thread discussing information for counsel regarding Elixir patent | AC |
| 61. | 05/17/05 | Dill, Kevin | Reeves, John; Lamkin, Karen, Esq. | Briggs, James; Davis, Keith | | | Email requesting advice from counsel regarding Elixir sales | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 62. | 05/18/05 | Reeves, John | Dill, Kevin; Lamkin, Karen, Esq. | Briggs, James; Davis, Keith | | | Email thread discussing and requesting advice from counsel regarding Elixir sales | AC |
| 63. | 05/18/05 | Haynes, Suzanne | Lamkin, Karen, Esq.; Briggs, James | Howey, Jon | | | Email providing information to counsel regarding Elixir | AC |
| 64. | 05/18/05 | Lamkin, Karen, Esq. | Reeves, John; Dill, Kevin | Thomas, Ed; Howey, Jon; Briggs, James; Davis, Keith; Haynes, Suzanne | | | Email thread discussing and requesting advice from counsel regarding Elixir sales | AC |
| 65. | 05/18/05 | Reeves, John | Dill, Kevin; Lamkin, Karen, Esq. | Thomas; Ed; Howey, Jon; Briggs, James; Davis, Keith | | | Email thread discussing and requesting advice from counsel regarding Elixir sales | AC |
| 66. | 05/18/05 | Reeves, John | Dill, Kevin; Lamkin, Karen, Esq. | Briggs, James; Davis, Keith | | | Email thread discussing and requesting advice from counsel regarding Elixir sales | AC |
| 67. | 06/10/05 | Howey, Jon | Briggs, James; Howard, Roy | Dill, Kevin | | | | AC |
| 68. | 07/04/05 | Mall, Monika | Dill, Kevin; Howard, Roy | Siebner, Harald; Kepets Ferber, Patricia | | | | AC |
| 69. | 07/06/05 | Dill, Kevin | Lamkin, Karen, Esq. | Howey, Jon; Reeves, John; Thomas, Ed; Briggs, James | | | | AC |
| 70. | 07/06/05 | Mall, Monika | Howey, Jon | Dill, Kevin; Kepets Ferber, Patricia; Siebner, Harald; Howard, Roy | | | Email thread discussing advice from counsel regarding investigation | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 71. | 07/06/05 | Howey, Jon | Mall, Monika; Roy, Howard | Dill, Kevin; Siebner, Harald; Kepets Ferber, Patricia | | | | AC |
| 72. | 07/07/05 | Dill, Kevin | Lamkin, Karen, Esq.; Reeves, John; Thomas, Ed; Howey, Jon; Briggs, James; Linker, Ron, Esq. | | | | | AC |
| 73. | 07/07/05 | Mall, Monika | Dill, Kevin; Howard, Roy | Howey, Jon; Kepets Ferber, Patricia; Siebner, Harald | | | | AC |
| 74. | 07/08/05 | Reeves, John; Lamkin, Karen, Esq.; Linker, Ron, Esq. | Dill, Kevin; Lamkin, Karen, Esq.; Reeves, John; Thomas, Ed; Howey, Jon; Briggs, James | | | | | AC |
| 75. | 07/15/05 | Dill, Kevin | Thomas, Ed | Briggs, James; Lamkin, Karen, Esq. | | | | AC |
| 76. | 12/20/05 | Howey, Jon | Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email requesting advice from counsel regarding patent application | AC |
| 77. | 12/20/05 | Howey, Jon | Dill, Kevin; Briggs, James; Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email thread discussing and requesting advice from counsel regarding Elixir patent | AC |
| 78. | 12/20/05 | Dill, Kevin | Howey, Jon; Briggs, James Balts, Timothy; Linker, Ron, Esq. | Dill, Kevin; Briggs, James; Haynes, Suzanne | | | Email thread discussing and requesting advice from counsel regarding Elixir patent | AC |

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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 79. | 01/19/06 | Howey, Jon | Dill, Kevin | Briggs, James; Petrice, Diane; Haynes, Suzanne | | | Email relaying advice from counsel regarding Elixir patent application | AC |
| 80. | 11/06 | | | | FW 005006 | | Internal Fiberweb report. Redacted portion reflects attorney advice. | AC |
| 81. | | | | | FW 005132 | | Internal Fiberweb document. Redacted portion reflects work performed under attorney direction. | AC/AP |
| 82. | 11/10/03 | Dill, Kevin | Salek, Joann | Anderson, Scott; Briggs, James; Goodpaster, Steve; Gudgeon, Julian; Dill, Kevin | FW 017670 | | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |
| 83. | 11/10/03 | Dill, Kevin | Salek, Joann | Anderson, Scott; Briggs, James; Goodpaster, Steve; Gudgeon, Julian; Dill, Kevin | FW 023247 | | Duplicate of Doc no. 82 | |
| 84. | 06/22/06 | Lamkin, Karen | Briggs, James; Rose, Mary Etta | | FW 007060-007061 | | Attorney-client communication. Karen Lamkin is an in-house Fiberweb attorney. | AC |
| 85. | 06/22/06 | Lamkin, Karen | Briggs, James; Rose, Mary Etta | | FW 007064-007065 | | Duplicate of Doc no. 84 | AC |
| 86. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 027459 | PX 55 | Internal Fiberweb document. Redacted portion reflects attorney advice. Tenotex was a part of Fiberweb at the time. | AC |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 87. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 007566 | | Duplicate of Doc no. 86 | |
| 88. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 007755 | | Duplicate of Doc no. 86 | |
| 89. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 017174 | PX 31 | Duplicate of Doc no. 86 | |
| 90. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 018385 | | Duplicate of Doc no. 86 | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 91. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 026811 | | Duplicate of Doc no. 86 | |
| 92. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 027449 | | Duplicate of Doc no. 86 | |
| 93. | 01/25/06 | Howey, Jon | Cometa, Bruno | Maglia, Nicola; Briggs, James; Dill, Kevin; Howard, Roy; Baumgartner, Michael; Saim, M.; Nova, M. | FW 027453-027454 | | Duplicate of Doc no. 86 | |
| 94. | 09/13/06 | Howey, Jon | Maglia, Nicola | Dill, Kevin; Briggs, James; Howard, Roy; Baumgartner, Michael; Nova, M.; Saim, M.; Cometa; Bruno | FW 027457 | PX 56 | Internal Fiberweb document. Redacted portion reflects attorney advice. Tenotex was a part of Fiberweb at the time. | AC |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 95. | 09/13/06 | Howey, Jon | Maglia, Nicola | Dill, Kevin; Briggs, James; Howard, Roy; Baumgartner, Michael; Nova, M.; Saim, M.; Cometa; Bruno | FW 017172 | PX 29 | Duplicate of Doc no. 94 | |
| 96. | 11/16/06 | Howey, Jon | Abed, Jean-Claude | | FW 027082 | PX 47 | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |
| 97. | 11/16/06 | Howey, Jon | Abed, Jean-Claude | | FW 028221 | | Duplicate of Doc no. 96 | |
| 98. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 028493 | PX 39 | Internal Fiberweb document. Redacted portion reflects work performed under attorney direction. | AC/AP |
| 99. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 007747 | | Duplicate of Doc no. 98 | |
| 100. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 026297 | | Duplicate of Doc no. 98 | |
| 101. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 026300 | | Duplicate of Doc no. 98 | |
| 102. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 026302 | | Duplicate of Doc no. 98 | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 103. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 026306 | | Duplicate of Doc no. 98 | |
| 104. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 026309 | | Duplicate of Doc no. 98 | |
| 105. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 027163 | | Duplicate of Doc no. 98 | |
| 106. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 027166 | | Duplicate of Doc no. 98 | |
| 107. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 028496 | | Duplicate of Doc no. 98 | |
| 108. | 10/27/06 | Howey, Jon | O'Connor, Jim | Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy | FW 028668 | | Duplicate of Doc no. 98 | |
| 109. | 01/09/06 | Briggs, James | Thomas, Ed | Anderson, Derek; Darrell, Dean; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 028792 | PX 59 | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 110. | 11/29/06 | Briggs, James | Anderson, Derek; Thomas, Ed | Howey, Jon; Dill, Kevin; Abed, Jean-Claude; Baumgartner, Michael | FW 023647 | PX 17 | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |
| 111. | 11/29/06 | Briggs, James | Anderson, Derek; Thomas, Ed | Howey, Jon; Dill, Kevin; Abed, Jean-Claude; Baumgartner, Michael | FW 024937-024938 | | Duplicate of Doc no. 110 | |
| 112. | 11/29/06 | Briggs, James | Anderson, Derek; Thomas, Ed | Howey, Jon; Dill, Kevin; Abed, Jean-Claude; Baumgartner, Michael | FW 024941 | | Duplicate of Doc no. 110 | |
| 113. | 12/22/05 | Dill, Kevin | Lindemann, Gerd; Howard, Roy | Major, Steve; Quertain, P.; Briggs, James; Howey, Jon | FW 006413 | PX 23 | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |
| 114. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 006636 | PX 26 | Internal Fiberweb document. Redacted portion reflects attorney advice. | AC |
| 115. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 006808 | | Duplicate of Doc no. 114 | |
| 116. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025341 | | Duplicate of Doc no. 114 | |
| 117. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025345 | | Duplicate of Doc no. 114 | |
| 118. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025353-025354 | | Duplicate of Doc no. 114 | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 119. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025364 | | Duplicate of Doc no. 114 | |
| 120. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025370 | | Duplicate of Doc no. 114 | |
| 121. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025376 | | Duplicate of Doc no. 114 | |
| 122. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025380 | | Duplicate of Doc no. 114 | |
| 123. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025386 | | Duplicate of Doc no. 114 | |
| 124. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025394 | | Duplicate of Doc no. 114 | |
| 125. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025401 | | Duplicate of Doc no. 114 | |
| 126. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025409 | | Duplicate of Doc no. 114 | |
| 127. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 025418 | | Duplicate of Doc no. 114 | |
| 128. | 11/28/06 | Dill, Kevin | Baumgartner, Michael; Abed, Jean-Claude | Briggs, James; Howard, Roy; Howey, Jon | FW 028023 | | Duplicate of Doc no. 114 | |
| 129. | 01/08/07 | Howey, Jon | | | FW 005240-005241 | PX 37 | Attorney-client communication. Document was sent to Raymond Linker, outside counsel to Fiberweb | AC |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 130. | | Reeves, John | Dill, Kevin; Lamkin, Karen | Thomas, Ed; Howey, Jon; Briggs, James; Davis, Keith | FW 016507-016511 | PX 20 | Attorney-client communication. Karen Lamkin is an in-house Fiberweb attorney. | AC |
| 131. | 01/09/07 | Briggs, James | Thomas, Ed | Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 007777 | PX 27 | Duplicate of Doc no. 109 | |
| 132. | 01/16/07 | Howey, Jon | Linker, Ron | Dill, Kevin; Briggs, James; Petrice, Diane | FW 012350-012352 | | Attorney-client communication. Document was sent to Raymond Linker, outside counsel to Fiberweb. | AC |
| 133. | 07/26/06 | Howey, Jon | Howey, Jon | | FW 028864-028865 | | Internal Fiberweb document. Redacted portion reflects work performed under attorney direction. | AC/AP |
| 134. | 08/10/03 | Karen Lamkin; Suzanne Haynes | Carol Webster; Kevin Dill; Steve Thress; Karen Lamkin | | FW 029272-029283 | | E-mail string with attachment. Attorney-client communication. Karen Lamkin is an in-house Fiberweb attorney. | AC |
| 135. | 07/11/05 | Dill, Kevin | Reeves, John; Lamkin, Karen | Bunn, Bill; Briggs, James | FW 023244-023245 | | Internal E-mail. Attorney-client communication. Karen Lamkin is an in-house Fiberweb attorney. | AC |
| 136. | 01/09/07 | Briggs, James | Thomas, Ed | Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 020460 | PX 30 | Duplicate of Doc no. 109 | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 137. | 07/24/06 | Howey, Jon; Ron Linker | Petrice, Diane | Dill, Kevin; Briggs, James | FW 006287-006301 | | Attorney-client communication. Letter from Raymond Linker, outside counsel to Fiberweb, to Diane Petrice and subsequent e-mail string discussing Ron Linker's letter. | AC |
| 138. | 10/30/06 | Baumgartner, Michael | Howey, Jon; Howard, Roy; Caldeira, Carlos | Dill, Kevin; Briggs, James; Petrice, Diane | FW 007395-007400 | | A similar e-mail string from Doc no. 137 discussing the same subject matter. | |
| 139. | 10/31/06 | Baumgartner, Michael | Howey, Jon; Howard, Roy | Howard, Roy; Caldeira, Carlos; Dill, Kevin; Briggs, James; Petrice, Diane | FW 015448-015455 | | A similar e-mail string from Doc no. 137 discussing the same subject matter. | |
| 140. | 11/02/06 | Baumgartner, Michael | Howey, Jon; Howard, Roy | Howard, Roy; Caldeira, Carlos; Dill, Kevin; Briggs, James; Petrice, Diane | FW 013837-013846 | | A similar e-mail string from Doc no. 137 discussing the same subject matter. | |
| 141. | 01/11/07 | Taylor, Tom | Briggs, James; Thomas, Ed | Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark | FW 006337 | PX 49 | Internal Fiberweb document. Document reflects attorney advice. | AC |
| 142. | 01/09/07 | Briggs, James | Thomas, Ed | Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 006338-006339 | | Duplicate of Doc no. 109 | |



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| Doc. No. | Date | Author/Source | To | Cc/bcc | Bates Range | Deposition Exhibit No. | Subject matter | Privilege claimed |
|---|---|---|---|---|---|---|---|---|
| 143. | 01/11/07 | Taylor, Tom | Briggs, James; Thomas, Ed | Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark | FW 017599 | | Duplicate of Doc no. 141 | |
| 144. | 01/09/07 | Briggs, James | Thomas, Ed | Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 017600-017601 | | Duplicate of Doc no. 109 | |
| 145. | 01/09/07 | Briggs, James | Thomas, Ed | Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom | FW 028870 | | Duplicate of Doc no. 109 | |



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# EXHIBIT C

# DOCUMENT 80

# Research and Technology Report

# November 2006

**Engineered Materials**

**REDACTED**

REDACTED

REDACTED

# EXHIBIT D

# DOCUMENT 81

| Internal or External Trial: | Title of Trial: | Line: | Duration, hrs. | Quantity of material sold: | Price of sale: |
|---|---|---|---|---|---|

REDACTED

# EXHIBIT E

# DOCUMENT 82

**From:** Dill, Kevin
**Sent:** Monday, November 10, 2003 10:56 AM
**To:** Salek, Joann
**Cc:** Anderson, Scott; Briggs, James; Goodpaster, Steve; Gudgeon, Julian; Dill, Kevin
**Subject:** Weekly report

**REDACTED**

**Kevin W. Dill**
Sr. Market Manager
BBA Fiberweb
840 SE Main Street
Simpsonville, SC 29681
800-338-7954 ext. 5892
Direct Line: 864-967-5892
Cell: 864 - 320-4272
Fax: 864-962-2034
Note: My new e-mail address is kdill@bbafiberweb.com <mailto:kdill@bbafiberweb.com>

# EXHIBIT F

# DOCUMENT 86

From: Howey, Jon
Sent: Wednesday, January 25, 2006 10:56 PM
To: 'bcometa@tenotex.com'
Cc: Nicola Maglia; JBriggs@bbafiberweb.com; KDill@bbafiberweb.com; royhoward_bba_industrial@yahoo.co.uk; mbaumgartner@fiberweb.fr; msaim@tenotex.es; mnova@tenotex.com
Subject: RE: Binder Spray System on Tenotex Line in Spain

Bruno,

REDACTED

I hope this explanation proves helpful. Let me know if you have further questions.

Best Regards,

Jon

# EXHIBIT G

# DOCUMENT 94

**From:** Howey, Jon
**Sent:** Wednesday, September 13, 2006 2:29 PM
**To:** Nicola Maglia
**Cc:** KDill@bbafiberweb.com; JBriggs@bbafiberweb.com; royhoward_bba_industrial@yahoo.co.uk; mbaumgartner@bbafiberweb.com; mnova@tenotex.com; msaim@tenotex.es; 'bcometa@tenotex.com'
**Subject:** RE: Binder Spray System on Tenotex Line in Spain

Nicola,

**REDACTED**

I hope this information proves helpful. Let me know if you have any questions.

Best regards,

Jon

---

From: Bruno Cometa [mailto:bcometa@tenotex.com]
Sent: Thursday, September 07, 2006 12:57 PM
To: JHowey@bbafiberweb.com
Cc: KDill@bbafiberweb.com; JBriggs@bbafiberweb.com; royhoward_bba_industrial@yahoo.co.uk; mbaumgartner@bbafiberweb.com; mnova@tenotex.com; msaim@tenotex.es; nmaglia@tenotex.com
Subject: R: Binder Spray System on Tenotex Line in Spain

# EXHIBIT H

# DOCUMENT 96

Best regards,

Jon

---

From: Howey, Jon
Sent: Thursday, November 16, 2006 8:27 AM
To: 'Abed, Jean-Claude'
Subject: RE: Order for 2 Containers of Tenotex (no binder) for Elixir SF

Jean-Claude,

**REDACTED**

Thank you for following up on this. Let me know if you have other questions.

Best regards,

Jon

---

From: Abed, Jean-Claude [mailto:JAbed@fiberweb.com]
Sent: Thursday, November 16, 2006 4:55 AM
To: JHowey@fiberweb.com
Subject: RE: Order for 2 Containers of Tenotex (no binder) for Elixir SF

# EXHIBIT I

# DOCUMENT 98

From: Howey, Jon
Sent: Friday, October 27, 2006 8:43 AM
To: O'Connor, Jim
Cc: Dill, Kevin; Briggs, James; Thomas, Ed; Taylor, Tom; Nicholson, Jimmy
Subject: Trial Request for GC

Jim,

REDACTED

Let me know if additional information is needed.

Thank you for your assistance.

Jon

Jon Howey
Research Fellow
BBA Fiberweb
844 SE Main St.
Simpsonville, SC 29681
phone: 864-962-2078
email: jhowey@fiberweb.com

*** PLEASE NOTE: NEW EMAIL ADDRESS ***

# EXHIBIT J

# DOCUMENT 109

**From:** Dean, Darrell
**Sent:** Tuesday, January 09, 2007 2:41 PM
**To:** Briggs, James; Thomas, Ed
**Cc:** Anderson, Derek; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom; Dean, Darrell
**Subject:** RE:
Jim

**REDACTED**

Darrell Dean

-----Original Message-----
From: Briggs, James
Sent: Tuesday, January 09, 2007 2:12 PM
To: Thomas, Ed
Cc: Anderson, Derek; Dean, Darrell; O'Connor, Jim; McCarty, Jerry; Dill, Kevin; Howey, Jon; Berman, Mark; Taylor, Tom
Subject:

REDACTED

# EXHIBIT K

# DOCUMENT 110

**From:** Briggs, James
**Sent:** Wednesday, November 29, 2006 7:54 AM
**To:** Anderson, Derek; Thomas, Ed
**Cc:** Howey, Jon; Dill, Kevin; Abed, Jean-Claude; BAUMGARTNER Michael
**Subject:** Elixir Sheet Fed

Derek,

**REDACTED**

Thanks,

Jim Briggs
Sales Director, Industrial Products
Fiberweb, Inc.
840 SE Main Street
Simpsonville, SC 29681
(864) 967-5891 tel
(864) 962-2088 fax
(864) 593-3503 mobile
Please note new E-mail address: Jbriggs@Fiberweb.com
<mailto:Jbriggs@Fiberweb.com>

# EXHIBIT L

# DOCUMENT 113

FROM : Dill, Kevin </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=DILLKEVIN>
TO : Lindemann, Gerd <GLindemann@bbafiberweb.com>, Howard, Roy <rhoward@bbafiberweb.com>
CC : Steve Major <smajor@bbafiberweb.com>, pquertain@bba-fiberweb.com, Briggs, James </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=BriggsJames>, Howey, Jon </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=HoweyJon>
DATE = 12/22/2005
TIME : 21:22:32 GMT
GMT_DATE = 12/22/2005
GMT_TIME : 21:22:32 GMT
SUBJECT : RE: Test with Elixir
FOLDER : \Personal Folders II\Kevin Dill
ATTACHMENT : \\BOALSSTORE\CONCORDANCE\DATABASE\0522425\0101\ATTACH0044 \daddc977cb054747933e938b40e5cc131061d100@svlexch0-a.am.bbafiberweb.net.#1.Elixir IP Statement (5).doc
MESSAGEID : daddc977cb054747933e938b40e5cc131061d100@svlexch0-a.am.bbafiberweb.net
MESSAGEINDEX = 0000000142
ENTRYID : 00000000F7C64274CD4D8E4086AE23170881679CA4AB2000
BODY : Gerd:

REDACTED

Kevin.

**Kevin W. Dill**
Product Director
BBA Fiberweb
840 SE Main Street
Simpsonville, SC 29681
800-338-7954 ext. 5892
Direct Line: 864-967-5892
Cell: 864 - 320-4272
Fax: 864-962-2034
Note: My new e-mail address is kdill@bbafiberweb.com <blocked::mailto:kdill@bbafiberweb.com>

# EXHIBIT M

# DOCUMENT 114

| | | |
|---|---|---|
| FROM | : | Dill, Kevin </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=DILLKEVIN> |
| TO | : | BAUMGARTNER Michael <mbaumgartner@fiberweb.com>, Abed, Jean-Claude <JAbed@fiberweb.com> |
| CC | : | Briggs, James </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=BriggsJames>, rhoward@bbafiberweb.com, Howey, Jon </O=BBAMTG/OU=SVL/CN=RECIPIENTS/CN=HoweyJon> |
| DATE | = | 11/28/2006 |
| TIME | : | 22:56:23 GMT |
| GMT_DATE | = | 11/28/2006 |
| GMT_TIME | : | 22:56:23 GMT |
| SUBJECT | : | RE: JC Orientation - Projects |
| FOLDER | : | \Personal Folders II\Kevin Dill |
| MESSAGEID | : | daddc977cb054747933e938b40e5cc1317c29615@svlexch0-a.am.bbafiberweb.net |
| MESSAGEINDEX | = | 0000000435 |
| ENTRYID | : | 00000000F7C64274CD4D8E4086AE23170881679C84832200 |
| BODY | : | Michael: |

REDACTED