IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DECLARATION OF KEVIN DILL IN SUPPORT OF FIBERWEB'S OPPOSITION TO PLAINTIFF'S MOTION FOR *IN CAMERA* REVIEW AND TO COMPEL PRODUCTION OF DOCUMENTS

I, Kevin Dill, do hereby state, upon personal knowledge, under the pains and penalties of perjury, the following:

1. During the 2003 to 2005 timeframe, I was a Fiberweb employee with managerial responsibilities.

2. I have reviewed document 82 bearing production number FW017670 in unredacted form.

3. Document 82 is an e-mail by me to Joann Salek dated November 10, 2003.

4. At the time I wrote this email, Joann Salek was Business Director at Fiberweb.

5. Scott Anderson, James Briggs, Steve Goodpaster, and Julian Gudgeon were copied on the e-mail.

6. To the best of my knowledge, at the time I wrote this email, Scott Anderson was a sales manager at Fiberweb.

7. To the best of my knowledge, at the time I wrote this email, James Briggs was a market manager at Fiberweb.

8. To the best of my knowledge, at the time I wrote this email, Steve Goodpaster was a market manager at Fiberweb.

9. To the best of my knowledge, at the time I wrote this email, Julian Gudgeon was a market manager at Fiberweb.

10. Prior the writing this e-mail, I understood that

REDACTED

11. In document 82, I relay to Joann Salek the status of

REDACTED

12. The people copied on the e-mail document 82 were copied because

REDACTED

13. From my perspective all information about the research and development of the Washtex II Premoistened project was and still is highly confidential to Fiberweb and to the best of my knowledge only Fiberweb employees have had access to such information.

14. I have reviewed document 113 bearing production number FW006413 in unredacted form.

15. Document 113 is an e-mail from me to Gerd Lindemann and Roy Howard dated December 22, 2005.

16. At the time I wrote this email, Gerd Lindemann was Graphic Arts Salesman at Fiberweb Europe.

17. At the time I wrote this email, Roy Howard was Graphic Arts Sales Manager at BBA Fiberweb Europe.

18. The Graphic Arts division at Fiberweb encompasses the ELIXIR® product.

19. Steve Major, Philippe Quertain, James Briggs, and Jon Howey were copied on this e-mail.

20. At the time I wrote this email, Steve Major, Gerd Lindemann, and Philippe Quertain were all Graphic Arts Salesman reporting to Roy Howard at BBA Fiberweb Europe.

21. To the best of my knowledge, at the time I wrote this email, James Briggs was the sales director in charge the ELIXIR® product.

22. At the time I wrote this email, Jon Howey was a developmental fellow at Fiberweb who participated in the development of the ELIXIR® product.

23. Jon Howey and I **REDACTED**

24. In the redacted portion of this e-mail, I **REDACTED**

25. To the best of my knowledge, the substance of the statement in the redacted portion of the e-mail was not distributed outside of Fiberweb.

Dated: January 8, 2008

Kevin Dill

CERTIFICATE OF SERVICE

I, Francis DiGiovanni, hereby certify that on January 9, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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

I further certify that on this same date I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record, and by Federal Express and e-mail on the following counsel of record:

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

/s/ Francis DiGiovanni
Francis DiGiovanni (#3189)