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 JAMES BRIGGS IN SUPPORT OF FIBERWEB'S OPPOSITION TO PLAINTIFF'S MOTION FOR *IN CAMERA* REVIEW AND TO COMPEL PRODUCTION OF DOCUMENTS

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

1. I have reviewed document 109 bearing production number FW028792 in unredacted form.

2. Document 109 is an email written by me on January 9, 2007 addressed to Ed Thomas.

3. At the time I wrote this email, I was the sales director in charge the ELIXIR® product at Fiberweb.

4. At the time I wrote this email, Ed Thomas was vice president of research and development at Fiberweb.

5. Derek Anderson, Darrell Dean, Jim O'Connor, Jerry McCarty, Kevin Dill, Jon Howey, Mark Berman, and Tom Taylor were copied on this email.

6. At the time I wrote this email, Derek Anderson was President at Fiberweb.

7. At the time I wrote this email, Darrell Dean was Maintenance & Engineering Manager at Fiberweb.

8. At the time I wrote this email, Jim O'Connor was Facility Manager at Fiberweb.

9. At the time I wrote this email, Jerry McCarty was Project Engineer at Fiberweb.

10. At the time I wrote this email, Kevin Dill was Product Director for the ELIXIR® product at Fiberweb.

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

12. At the time I wrote this email, Mark Berman was Hygiene Business Manager at Fiberweb.

13. At the time I wrote this email, Tom Taylor was a Process Engineering Leader at the Gray Court facility which manufactures the fabric used in the ELIXIR® product.

14. At sometime before I wrote this email, Jon Howey and I had discussions with Michael Zeliger and Jackson Ho, outside counsel to Fiberweb, about **REDACTED**

15. Michael Zeliger and Jackson Ho advised Jon Howey and I concerning **REDACTED**

16. In the email of Document 109, I relayed outside counsels' advice to Fiberweb employees in a position to provide input concerning counsels' advice.

17. I have reviewed document 141 bearing production number FW006337 in unredacted form.

18. Document 141 is an email from Tom Taylor to me and Ed Thomas dated January 11, 2007.

19. This email was a response to my email document 109 identified above in paragraph 2 of this declaration.

20. The same people that were copied in email document 109 were copied on this email as well.

21. In this email, Tom Taylor responded to my email document 109 and presented some options regarding outside counsels' advice.

22. From my perspective all information about an internal trial or project at our manufacturing plant would have been considered confidential to everyone involved in this project and to the best of my knowledge only Fiberweb employees have had access to such information.

Dated: January 9, 2008

Jim Briggs

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)