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.	)	

STIPULATION AND PROPOSED ORDER STAYING THE CASE

WHEREAS, the parties are negotiating a settlement of this litigation, and the discussions are in an advanced stage;

WHEREAS, because of the advanced settlement negotiations, and the anticipated settlement of the case, the parties seek a stay of the case and of remaining dates set forth in the Fourth Amended Scheduling Order (D.I. 61) , namely: expert report exchanges, close of fact and expert discovery, dispositive motion submission deadline, pretrial conference, and trial;

It is hereby stipulated by plaintiff Baldwin Graphic Systems, Inc. ("Baldwin") and defendants Fiberweb Simpsonville, Inc. and Fiberweb, Inc. (collectively "Fiberweb"), subject to the approval of the Court, that:

(1) the case is STAYED, and the remaining dates in the Scheduling Order are no longer required to be met; and

(2) the parties shall file a joint status report, or shall dismiss the case, on or before May 16, 2008.

Counsel for Baldwin and Fiberweb certify under Local Rule 16.5 that they have sent a copy of this request to their respective clients.

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SO ORDERED this ____ day of _____, 2008.

_____
UNITED STATES DISTRICT COURT JUDGE