IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ARGENTUM MEDICAL, LLC	:	No. 3:07 cv 6769
Plaintiff,	:	Hon. George W. Lindberg
v.	:	Magistrate Judge Jeffrey Cole
NOBLE BIOMATERIALS, and DERMA SCIENCES, INC.,	:	
Defendants.	:	

VERIFICATION OF JEFFREY B. KEANE IN SUPPORT OF DEFENDANT NOBLE BIOMATERIALS, INC.'S MOTION TO DISMISS OR TRANSFER

Jeffrey B. Keane hereby verifies as follows:

1. I am President and Chief Executive Officer of Noble Biomaterials, Inc. ("Noble").

2. In this position, I am familiar with Noble's business and structure. This Verification is based upon information personally known by me or obtained in the course of performing my duties as Noble's President and Chief Executive Officer.

3. Noble is organized and existing under the laws of the State of Delaware and maintains its principal place of business at 300 Palm Street, Scranton, Pennsylvania.

4. Noble traces its history to the Sauquoit Silk Company which was founded in 1883, and Noble has been involved in the textile industry since that time. Since approximately 1977, operating under the name of Sauquoit Industries, Noble has manufactured fine diameter fibers coated primarily with silver. These fibers are used as raw materials in devices that protect

against static electricity and in devices that provide electromagnetic shielding. Additionally, since approximately 1995, the metalized silver fibers Noble produces have been used in products to exploit of what has been known for centuries to be the antimicrobial properties of silver.

5. At the present time, Noble owns Sauquoit Industries, LLC and Noble Fibers, LLC. Sauquoit Industries, LLC continues to manufacture silver coated fibers. Noble Fibers markets these products under the X-STATIC® brand. Noble Fibers also produces a line of medical products, including wound dressings, apparel for diabetics and protective linings used under casts, through third-party manufacturers and markets these products under the SILVERSEAL® brand. X-STATIC® silver metalized fibers are also sold to third-parties for use in medical and other products, including climbing and cycling gear, golf wear, hiking clothes, running apparel, ski wear, snowboarding gear, yoga wear, sports bras, hi-performance socks, protective gear, garments for the military and NASA, bedding, towels and pet products. Using X-STATIC® fibers in these products serves to diminish odor because of the antimicrobial properties of silver.

6. Noble's sole manufacturing facility is in Scranton, Pennsylvania.

7. Neither Noble, Sauquoit Industries nor Noble Fibers maintain offices or other facilities or have any employees in Illinois.

8. Noble's SILVERSEAL® medical products are sold to a distributor, defendant, Derma Sciences, Inc., FOB Scranton, Pennsylvania. While Noble sells to other distributors and make direct sales of its SILVERSEAL® products, it does not sell these products to customers or distributors in Illinois.

9. Noble is not aware that any of its SILVERSEAL® medical products are being sold or distributed in Illinois.

10. Noble's sole contact with Illinois with respect to Noble Fibers' SILVERSEAL® products is that Noble Fibers' representatives have attended a large, industry-wide trade show in Chicago on at least two occasions. Neither Noble Fibers nor any representatives made any sales in Illinois or attempted to make any sales directly to Illinois customers at these trade shows.

I declare under penalty of perjury that the foregoing is true and correct.
Dated: March 10, 2008

Jeffrey B. Keane