EXHIBIT B part 1

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

ARGENTUM MEDICAL, LLC Plaintiff -VS- NOBEL BIOMATERIALS and DERMA SCIENCES, INC. Defendants	NO. 07CV6769

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TUESDAY, APRIL 29, 2008

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C O N F I D E N T I A L

Oral deposition of JEFFREY KEANE, was taken at the law offices of Cozen & O'Connor, 1900 Market Street, Philadelphia, Pennsylvania, before Renee Schumann, a Notary Public of the State of New Jersey and Notary Public of the Commonwealth of Pennsylvania, on the above date, commencing at 3:03 p.m.

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I N D E X

WITNESS	PAGE
JEFFREY KEANE,	
(Witness Sworn.)	
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REQUESTS FOR PRODUCTION:

None

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(It is agreed by and between counsel that sealing, filing, and certification are hereby waived and all objections, except as to the form of the questions, are reserved until the time of trial.)

* * * * *

JEFFREY KEANE, having been duly sworn according to law, was examined and testified as follows:

* * * * *

MR. FUCHS: Let's mark this as Exhibit Number 1.

* * * * *

(Whereupon, Exhibit-1 was marked for identification.)

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MR. FUCHS: This is a Notification of a Docket Entry and this is basically the reason that we're here today, that the Plaintiffs moved for an order for an expedited discovery and the Judge granted the order and has said that Plaintiff is granted leave to depose Jeffrey B. Keane on or before May 2, 2008.

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DIRECT EXAMINATION

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BY MR. FUCHS:

Q. All right. Mr. Keane, have you ever been deposed before?

A. Yes.

Q. And how many times would you say you've been deposed?

A. Once.

Q. So can you state your name and spell it for the record?

A. Jeffrey Keane, J-E-F-F-R-E-Y, K-E-A-N-E.

Q. Can you tell me your home address?

A. 224 Mansfield Avenue, Darien, Connecticut, D-A-R-I-E-N, 06828.

Q. Can you give me a brief synopsis of your positions you've held from after college to your present position?

A. Graduate school, MBA, Emory University. Marketing positions, General Mills. Marketing in general management positions, National Foods, Inc. General management positions, Playtex Products, Inc.

General management positions, Minami, Inc., M-I-N-A-M-I. General management positions, Somerset,

and currently CEO of Noble Biomaterials, Inc.

Q. Can you give me a brief, I guess, history of Noble Biomaterials or can you describe the corporate forum of Nobel Biomaterials?

A. Can you help me with that question? I'm not quite sure what you mean.

Q. Sure. I am just wondering if you have any subsidiary companies or if it's a single, Noble Biomaterials, is that the only corporate entity for which you work?

A. Noble Biomaterials, Inc. is the formalized umbrella corporation. Underneath that is two corporate entities, Noble Fiber Technologies and Sauquoit Industries.

Q. And can you tell me the nature of Noble's business?

A. We are in the business of metallizing nylon.

Q. And in particular, can you elaborate a little bit on Noble Fiber Technologies?

A. Maybe you could help me with that question.

Q. Okay. Well, what is the difference between Noble Fiber Technologies and Sauquoit?

I'm trying to get an idea of how the

product lines are differentiated between those two companies?

A. They're not. The two companies were merged from an operating standpoint and so though the two companies exist legally from an operating vantage point, there's no differentiation between the two corporate entities.

Q. Are they both Delaware corporations?

A. That's correct.

MR. HAYES: I think they're LLCs actually.

MR. FUCHS: Okay.

MR. PURCELL: Bob?

MR. HAYES: Yes.

MR. PURCELL: Those are -- the underlying LLCs are Pennsylvania LLCs.

MR. FUCHS: Okay. Thank you.

BY MR. FUCHS:

Q. Can you tell me what silver nylon products Noble Biomaterials sells?

A. We sell a filament based product, a

staple based product, a foam based product and additionally we sell finished wound care products.

Q. And I notice that there were some products dealing with sport goods like clothing and

that kind of thing, where would that fall within your -- those items you just mentioned?

A. We don't sell those directly. Those are sold by licensees of ours who make use of that filament, staple or foam product.

Q. What products in the wound care division of Noble Biomaterials do you sell?

A. Maybe you can be more specific.

Q. Well, you have silver nylon wound management products, can you identify those by name?

A. Today we sell to the wound care marketplace in two fashions. One is we are a supplier of silver nylon products to licensees, and then additionally we sell finished products under the brand name of SilverSeal.

Q. Of the supplier of the silver nylon products, can you identify the distributors you use for that particular product?

MR. HAYES: What product are you talking about?

MR. FUCHS: I'm talking about the supplier where you sell silver nylon that's not in a completed state.

MR. HAYES: That's beyond the scope of jurisdictional discovery.

MR. FUCHS: I disagree with that.

MR. HAYES: On what basis?

MR. FUCHS: Well, the idea here is that jurisdiction can be based on specific or a general jurisdiction. So if Noble is doing business in a regular fashion with the State of Illinois, that would establish jurisdiction regardless of whether it is a finished nylon product or whether it falls under the patent.

MR. HAYES: I disagree that the sale of products to a distributor -- there's no reasonable basis to argue that would satisfy general jurisdiction. I think it's beyond the scope of jurisdictional discovery consistent with the Court's order.

I'll instruct the witness not to answer the question.

MR. FUCHS: What I think we should do is as long as we are going to have this

objection, because I see this is going to be -- I figured based upon your answering of the document request and the Interrogatories relating to personal jurisdiction or specific jurisdiction and not to general I thought this objection may come up.

So I think we should probably try to get Judge Lindberg on the phone and have him resolve it right now. I have the number right here.

* * * * *

(Whereupon, we went off the record to call Judge Lindberg.)

* * * * *

MR. FUCHS: We are going to resume. We attempted to call Judge Lindberg's chambers and we reached Judge Lindberg's voicemail message, outgoing message.

So we were unable to resolve the issue of whether or not we can inquire into issues of general jurisdiction, and Mr. Hayes has stated that we're going to be limited to inquiring on issues to specific jurisdiction.

MR. HAYES: No, that's not my position.

MR. FUCHS: Okay.

MR. HAYES: You're certainly entitled to inquire as to both general and specific jurisdiction. I think the case law is well settled, however, the general jurisdiction you must show continuous ongoing activity itself within the State of Illinois such as offices

there, regular place of business, that type of thing. If you want to ask questions along those lines, you are certainly entitled to do so.

However, to the extent that you want to pursue questions of specific jurisdiction, that would relate to the products that are alleged to infringe the patent, which I understand you claim generally are wound care products which consist of those dressings that would be applied directly to the wound, and you allege certain other products like the underliner -- cast underliner and I believe the burn gloves also infringe; so, we provided information about that.

I don't know if the witness has this information, but as a compromise to try to

move this along if you want to ask where distributors of other such products are located without their names, which is confidential information, and we certainly even though we have a confidentiality stipulation I don't think even pursuant to that stipulation that we should have to produce -- provide information that's

to a competitor's attorney that's not relevant to the jurisdiction.

But anyway, if you want to ask where distributors are located and if the witness can provide that information I will allow him to answer that as a compromise to try to move this thing along.

MR. FUCHS: I'm going to disagree. I will try to move along, but I believe the case law supports that if you put a product in the stream of commerce and it makes its way into Illinois, that is sufficient to establish personal jurisdiction either general or specific, but I'll move on.

I'm going to mark what is entitled Verification of Jeffrey B. Keane in Support of

Defendant Noble Biomaterials, Inc.'s Motion to Dismiss Or Transfer.

* * * * *

(Whereupon, Exhibit-2 was marked for identification.)

* * * * *

BY MR. FUCHS:

Q. Mr. Keane, I'm going to hand you what is marked as Exhibit Number 2. I just want to see if

you're familiar with this document.

A. Yes, I'm familiar with this document.

MR. HAYES: Off the record for another second.

* * * * *

(Whereupon a discussion was held off the record.)

* * * * *

BY MR. FUCHS:

Q. Were you involved with the preparation of this document?

A. Yes.

Q. And did you have any help from any non-attorney in preparing this document?

A. Yes.

Q. Can you identify those people that were involved?

A. Specific names?

Q. Yes, and positions, please.

A. In addition to attorneys.

Q. No, not including attorneys.

A. Ron Flormann, who is general manager of our wound care division. Jeff Glattely, who is director of marketing for our wound care division. Jim Walsh, who is our chief financial officer. Joel

Furey, who is our EVP of business development. Gail Prymock, who is our customer service representative. To my knowledge, that's the list.

Q. So it would be Ron Flormann --

A. Excuse me, there would be one more.

Q. Okay.

A. Pat Davidson, who is our legal assistant and not a lawyer.

Q. Okay. Thank you.

So other than Ron Flormann, Jeff Glattely, Jim Walsh, Joel Furey, Gail Prymock and Pat Davies --

A. Davidson.

Q. Pat Davidson, thank you. Can you think

of anybody else that may have been involved?

A. At this point in time, no.

Q. Do you have anything to help you remember? Do you have any notes or anything that would help you to refresh your recollection?

A. I do not have any notes to refresh my recollection. Having said that, there were aspects of the data collection where there may have been -- these people may have asked others to cooperate in that effort.

Q. I understand.

Did you contact any distributors of Noble for the purpose of answering or for filling out this verified statement?

A. I did not directly contact anyone. I think within that group of people there was a conversation with Derma Sciences to determine what their initiatives, if any, were.

Q. Do you know who had that conversation?

A. No, I don't.

Q. Can you tell me what Noble's practices are in selling its wound care products?

A. Can you be more specific?

Q. Sure. How are the orders taken?

A. The majority of our orders are received -- are placed by a distributor directly to us. We will process that order through our customer service department. If we have the inventory, ship it. If we don't have the inventory, order it and we will then ship it to that distributor, typically FOB Scranton and that's our order fulfillment process.

Q. Do you take orders by telephone?

A. Yes.

Q. Do you take them by e-mail?

A. Yes.

Q. And fax?

A. Yes.
Q. And e-mail or electronically?
A. Through e-mail, yes. Not EDI, not electrical data interface, no.
Q. Do you take any orders from the internet?
A. No.
Q. What documents are prepared in processing these orders?
A. We have within our order entry system essentially a report that lists each of the entries by a specific item number, and that is essentially

our manifest that drives our fulfillment process.
Q. What specific documents though like -- do you have invoices, bill of ladings, purchase orders, that kind of thing?
Can you take me through the process from the time you receive an order to the time it's shipped?
A. I can't, no.
Q. How come you can't?
A. I don't know it.
Q. You don't know the process?
A. No.
Q. Who would know that process?

A. I would -- our order entry people would know that.

MR. FUCHS: I'm going to ask the court reporter to mark Exhibit Number 3 documents produced under Bates Numbers N000068 through N0069.

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(Whereupon, Exhibit-3 was marked for identification.)

* * * * *

BY MR. FUCHS:

Q. I'm going to show you what has been marked as Exhibit Number 3, and it says at the caption -- it says invoice and it has invoice number 258075 and it's addressed to Edgepark, E-D-G-E-P-A-R-K, all one word, Surgical of 1810 Summit Commerce Park, Twinsburg, Ohio.

Can you tell me what that document is?

A. No, I cannot.

Q. Have you ever seen this type of document?

A. No, I haven't.

Q. Is it possible that this is a Noble invoice?

A. Possible.

Q. One thing I noticed on this document is that the invoice has -- it says bill to Edgepark Surgical, and then on page N69 it's delivered to RGH Horned Frog Medical in Fort Worth, Texas.

Do you understand why that would be done?

A. No, I don't.

MR. FUCHS: I'm going to ask the reporter to mark Exhibit Number 4, documents Bates Numbered N000092 through N000102.

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(Whereupon, Exhibit-4 was marked for identification.)

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BY MR. FUCHS:

Q. Okay. I'm going to show you what has been marked as Exhibit Number 4; and, again, this has a caption, invoice and it says bill to Edgepark Surgical, that's on page 92.

Are those Noble documents?

A. Possibly.

Q. I'm looking at page N92. You have under item number it has the SS-WCD-0404. Can you tell me what that refers to?

A. No, I cannot.

Q. Do you know anybody who could tell us what that refers to?
A. Possibly.
Q. Who would that be do you think?
A. Customer service people.
Q. All right. Can I direct your attention to N97 within Exhibit Number 4. Have you ever seen this document before?
A. No.

Q. Do you know who generated this document?
A. No.
Q. Do you think this is a Noble document?
A. I don't know.
Q. Do you see under the caption silver contact layer dressings?
A. Yes.
Q. There's a reference under the column headed by HCPC the number A6207 and it has manufacturer, Care Medical; item number WCD412 and then Silverlon contact.
Do you understand why this would -- why Silverlon would appear in this document?
A. No.
Q. Can you tell me who sells Noble's

products?
A. Would you be more specific?
Q. Sure. Let's start with the wound care products.
A. Can you be more specific?
Q. Well, let's talk about Noble direct sales first. Does Noble have a direct sales force?
A. For which products?

Q. For its wound care products.
A. Again, which wound care products?
Q. Sold under the SilverSeal name.
A. Yes, we do.
Q. How many people are involved with that sales effort?
A. Direct sales?
Q. Yes.
A. Two.
Q. Can you tell me their names?
A. Ron Flormann, Jeff Glattely.
Q. Do you know how they go about making sales of Noble's wound care products under the SilverSeal name?
A. Can you be more specific?
Q. What is the nature of their sales activities?

A. I still don't understand the question.
Q. How do they go about generating business for Noble?
A. They primarily spend their time identifying distributors that will sell the SilverSeal wound care products to users. Additionally, there are some accounts where we

service directly not through a distributor. That's a minority of their time.
Q. Do you know -- can you identify the names of the companies where you sell directly to or Noble sells directly to these people?
A. I can identify one, but it won't be exhaustive.
Q. Who is that one?
A. That would be Mercy Hospital.
Q. Where are they located?
A. In Pennsylvania.
Q. Can you tell me the number of sales offices you have for Noble?
A. Can you be more specific in terms of which products?
Q. For any of its products.
A. Do you want that -- can you give me a definition of sales office?

Q. It could be somewhere where people work in order to generate orders, could be their homes, could be official offices with Noble signage, anything like that?

MR. HAYES: Objection to the question as vague and ambiguous. Overbroad. You can

answer it.

THE WITNESS: I don't understand the question.

MR. HAYES: Are you asking what offices Noble maintains?

MR. FUCHS: Yes.

THE WITNESS: We have an office in Scranton, Pennsylvania. We have an office, official office, in Veneziano, Italy. Then we have people around the globe working out of their homes.

BY MR. FUCHS:

Q. For the people in the United States working from their offices, how many people does that include?

A. A range of -- because I don't have the exact number, between 10 and 15.

Q. And do you know the location of these offices or these home offices?

MR. HAYES: Objection to the form of the question. Assumes facts not in evidence. You can answer.

THE WITNESS: No, I don't know them all.

BY MR. FUCHS:

Q. Do you know if any of them are in Illinois?

A. Yes, and there are none.

Q. So you know they are not in Illinois, but you don't know exactly where they are, correct?

A. Correct.

Q. How do you know that they're not in Illinois?

A. Because we checked.

Q. How did you check?

A. We went through our employee list.

Q. Let's talk about authorized distributors. How does someone become an authorized distributor of Noble products?

A. Would you be more specific in terms of products?

Q. Any of Noble's products.

THE WITNESS: In becoming a distributor for SilverSeal we determine if it's a

qualified business partner, the kinds of end customers that they access, the business philosophy and the way that they do business, whether they have appropriate credit terms.

BY MR. FUCHS:

Q. How do you -- what else has to occur? Do you have to have a signed agreement for them to become authorized distributors?

A. Typically yes, but not always.

Q. What instances have you not had a signed agreement?

A. Historically there have been some handshake agreements for distribution of some of the wound care products. At present, all distribution is formalized with a written agreement.

Q. Can you identify the companies with which you have a handshake agreement with?

A. To the best of my knowledge, we have none currently, so we don't have any distributors with handshake agreements on SilverSeal wound care products.

Q. So the list of people who distribute the SilverSeal product will be different from the list of people that distribute other of Noble's products?

A. Possibly.
Q. Do you know where the authorized distributors are located for the SilverSeal product?

A. Exhaustively, no.
Q. Do you know if any are in Illinois?
A. Yes.
Q. And are any in Illinois?
A. No.
Q. How do you know that?
A. We checked.
Q. Who checked?
A. That same list of people that we identified earlier.
Q. Okay. Do you know if any of your distributors -- strike that.
Do any of your distributors of the SilverSeal product have warehouses in Illinois?
A. I wouldn't know that.
Q. Do you know if any of your distributors target sales in Illinois?
A. I wouldn't know that.
Q. Do you know who would know that?
A. Yes.
Q. Who would that be?
A. The distributors.