

**EXHIBIT A**

**Affidavit of John Glidden**

# L. W. PACKARD & COMPANY, INC.

FAX # (603)968-7649

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6 Mill Street  
Ashland, New Hampshire 03217-0515

Telephone (603)968-3351

STATE OF NEW HAMPSHIRE

JANUARY 12, 2007

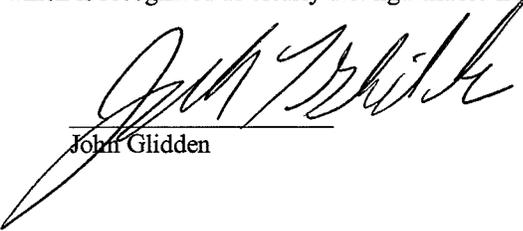
COUNTY OF GRAFTON

## AFFIDAVIT OF JOHN GLIDDEN

Before me, an officer authorized to administer oaths, personally appeared John Glidden, who, after first being duly sworn, deposed and said the following:

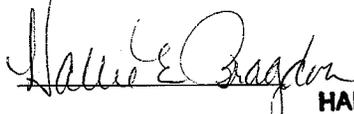
1. I am the President and Chief Executive Officer of L.W. Packard & Co., Inc. ("Packard"), 6 Mill Street, Ashland, New Hampshire 03217. Packard has been owned and operated by my family for four generations.
2. I was graduated from the Philadelphia College of Textiles and Science with a B.S. in Textile Engineering in 1978, and upon graduation I went to work for Packard.
3. I became the President and CEO of Packard in 1986 and presided over the company's most successful and productive operations.
4. In 1995, for example, Packard was selected by Textile World magazine as one of the Top Ten Textile Plants In The World, and was the only woolen mill to be in the top ten group.
5. Until recently, Packard had a vertically integrated U.S. operation producing woolen spun yarns, and 100% wool, wool-blend, cashmere and camelhair fabrics for the coating and sport jacket industry.
6. Packard had a capacity of over 3 million yards per year and enjoyed approximately \$40 million in sales in a typical year.
7. I am also currently running a Chinese woolen plant and, as such, remain very active in the market for the types of woolen fabrics covered by Rothschild's request.
8. I am very familiar with the production of woolen fabrics, the market for such fabrics, and the commercial requirements of purchasers of woolen coating fabrics.
9. I have reviewed the commercial availability petition filed with the Committee for the Implementation of Textile Agreements by S. Rothschild & Co., Inc. ("Rothschild"), particularly the fabrics, quantities, and delivery timing requested by Rothschild.
10. Based on our years of operation and service of customers in the coating industry, I know that the delivery of initial production quantities of coating fabrics, such as those requested by Rothschild, are universally expected within, and are only considered timely if, they are offered in 45 to 60 days.
11. Packard typically offered its initial production quantities for delivery in no more than 6 weeks.
12. Packard provided all swatch samples requested by customers free of charge, and provided larger sample yardages at the standard per yard price with no minimum quantity. If the samples requested were among our wide range of goods, they would be provided in days. Special request samples would also be made from scratch and provided within 3 to 4 weeks with swatches provided free and larger sample yardages provided at the standard per yard price with no minimum quantity.

13. Delivery of production quantities in more than 90 days is neither timely nor commercially acceptable in the marketplace for coating fabrics. No credible producer of these fabrics would offer delivery of initial production quantities in more than 90 days. Packard never expected to obtain an order that it offered for initial delivery in more than 90 days. Packard would often take large orders with deliveries spread out over several months and initial deliveries starting 45 to 60 day after the order was placed.
14. The total quantities requested by Rothschild for the four identified fabrics—over 820,000 yards to be produced in the course of a 6 to 7 month season—are quantities which I know, based on my knowledge of the coat market, to be only a fraction of Rothschild's total annual needs. And from recent conversations in late 2006 and early 2007 with several of Rothschild's competitors, this is a small percentage of woolen type fabric currently being sourced for woolen coats to be sold in the United States.
15. Packard and its competitors routinely offered customers reserve capacity, as described in the Rothschild petition, which is a projected production and purchase amount based partly on past apparel sales.
16. The quantities requested by Rothschild, though not representing Rothschild's full needs or coming anywhere close to representing the total needs of the CAFTA-DR coating fabric market, are substantial, and typically a mill would need to have 2.5 to 3 million yards of annual capacity to be able to supply the requested yardage over 6 to 7 months to a single customer.
17. A mill with 1 to 1.5 million yards of total annual production capacity could not supply the requested quantities, particularly considering that no mill would want to give up all of its worsted production and most of its other customers to serve the demands of a single woolen coating fabric customer.
18. I have also reviewed the technical specifications for and samples of Rothschild's Fabric Nos. 3 and 4—the 100% wool fabric and the camelhair fabric—as well as Loro Piana's fabric styles numbered 4746 and 1577.
19. The Loro Piana fabrics cannot be considered commercially substitutable for Rothschild's requested 100% wool and camelhair fabrics because they are made with much finer gauge fibers and thinner and different types of yarns. For example, the yarns used in the camelhair fabric offered by Loro Piana are two ply yarns which are of an entirely different construction and create an appearance and feel different than that requested by Rothschild.
20. The fabrics offered by Loro Piana also have very different finishes. For example, the finish on the wool fabric offered by Loro Piana is a doeskin finish which is recognized as clearly distinguishable from and not substitutable for the requested velour finish.



John Glidden

Sworn to and subscribed before me  
this 12 day of January, 2007



**HALLIE E BRAGDON, Notary Public**

My commission expires: **My commission expires NOVEMBER 10, 2009**

**EXHIBIT B**

**Affidavit of Boris Shlomm**

STATE OF NEW YORK

COUNTY OF NEW YORK

AFFIDAVIT OF BORIS SHLOMM

Before me, an officer authorized to administer oaths, personally appeared Boris Shlomm, who, after first being duly sworn, deposed and said the following:

1. I am the President and Chief Executive Officer of Amicale Industries, Inc. ("Amicale"), 1359 Broadway, New York, NY 10018. Amicale has been owned and operated by my family for three generations.
2. Until recently, Amicale had a vertically integrated U.S. operation producing woolen spun yarns, and cashmere, camelhair, cashmere-wool blends, and 100% wool fabrics for the coating and sport jacket industry.
3. Amicale had a capacity of about 1 to 1.5 million yards per year and enjoyed approximately \$25 million in sales in a typical year.
4. As the operator of this business I am very familiar with the production of such fabrics, the market for such fabrics, and the commercial requirements of purchasers of woolen coating fabrics.
5. I have reviewed the commercial availability petition filed with the Committee for the Implementation of Textile Agreements by S. Rothschild & Co., Inc. ("Rothschild"), particularly the fabrics, quantities, and delivery timing requested by Rothschild.
6. Based on our years of operation and service of customers in the coating industry, I know that the delivery of initial production quantities of coating fabrics, such as those requested by Rothschild, are universally expected within, and are only considered timely if, they are offered in 60 to 90 days. In fact, delivery times have contracted since our peak production periods and today are expected as quickly as 45 to 60 days.
7. Delivery of production quantities in more than 90 days is neither timely nor commercially acceptable in the marketplace for coating fabrics. No credible producer of these fabrics would offer delivery of initial production quantities in more than 90 days.
8. The total quantities requested by Rothschild for the four identified fabrics—over 820,000 yards to be produced in the course of a 6 to 7 month season—are quantities which I know, based on my knowledge of the coat market, to be only a fraction of Rothschild's total annual needs.
9. Still, even these quantities requested by Rothschild are in excess of what Amicale could have handled producing, given its capacity of about 1 to 1.5 million yards

per year, even though we were fully dedicated to producing woolen fabrics and made no worsted fabrics, because even if we had the physical and technical capacity, we could not dedicate the vast majority of our capacity to a single customer for seasonal production over 6 to 7 months, and no credible producer would suggest it could do this.

  
Boris Shlomm

Sworn to and subscribed before me  
this 15<sup>th</sup> day of January,  
2007



My commission expires: 5/01/10

