IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re)) Chapt	er 11
GLOBAL SAFETY TEXTILES HOLDINGS LLC, et al., 1) Case I	No. 09-12234
HOLDINGS LLC, <u>et al.</u> ,	Debtors.) Jointly	y Administered

DEBTORS' DESIGNATION OF TESTIMONY AND EXHIBITS IN SUPPORT OF MOTION FOR EMERGENCY RELIEF AUTHORIZING USE OF CASH COLLATERAL

The Debtors intend to present the following testimony and evidence in connection with the Debtors' Motion for Emergency Relief Authorizing Use of Cash Collateral.

A. Proffers of Written Testimony

- 1. Declaration of Salvatore LoBiondo Jr. The Debtors will make Mr. LoBiondo available for cross-examination.
- 2. Affidavit of Anthony Forman in Support of First Day Pleadings. The Debtors will make Mr. Forman available for cross-examination.

B. Exhibits

- 1. Amendment and Restatement Agreement, dated April 15, 2008.
- 2. Term and Revolving Facility Agreement, dated December 8, 2006, as amended April 1, 2007, June 11, 2007, November 16, 2007, and amended and restated on April 15, 2008.
- 3. Intercreditor Deed dated December 8, 2006 and amended and restated on April 15, 2008.

The Debtors are comprised of the following nine entities (with the last four digits of their respective taxpayer identification numbers, if any, in parentheses): Global Safety Textiles Holdings LLC (1938), GST ASCI Holdings Asia Pacific LLC (7107), GST ASCI Holdings Europe, Inc. (7081), GST ASCI Holdings Europe II LLC (7081), GST ASCI Holdings Mexico, Inc. (7083), GST Automotive Safety Components International, Inc. (1750), Global Safety Textiles LLC (3442), Global Safety Textiles Acquisition GmbH, and GST Widefabric International GmbH. The address for each of the Debtors is 804 Green Valley Road, Suite 300, Greensboro, North Carolina 27408.

The Debtors reserve the right to amend or supplement their designation of testimony and evidence as necessary.

Dated: July 1, 2009 Wilmington, Delaware

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Proposed Attorneys to the Debtors and Debtors in Possession