

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Opposition No. 91201001

In the matter of application serial no. 85007380

----- X

VICTORIA'S SECRET STORES BRAND
MANAGEMENT, INC.,

Opposer,

v.

Yael Mamroud / Cummins (on behalf of Vitamine & Sea)

Applicant.

----- X

ANSWER TO MOTION TO EXTEND DISCOVERY PERIOD

In regards to the request from Victoria's secret for an extension of the time allowed to Discovery period.

Firstly, we would like to state that we find the timing of the filing of their requests for interrogatories and subsequent request for an extension of time to allow us to properly respond to these requests to be suspicious, as they had made no prior attempt to contact us and made their filings within two days of the expiration of the time allowed without offering any justification for this disregard for respect of the standard protocol.

As stated within our response to their requests, we found that this left us without the time to file a proper response and as we are not interested in delaying this process further, felt that Victoria's Secret had failed to supply us with any valid reason to grant them this accommodation.

However, after taking the time to properly assess our position and in the interest of respecting this process and having the opportunity to respond to the interrogatories requested from Victoria's Secret so as to affirm our innocence, goodwill, and good faith, we respectfully request the following:

That the USPTO deny Victoria's Secret's request for an extension of 60 days,



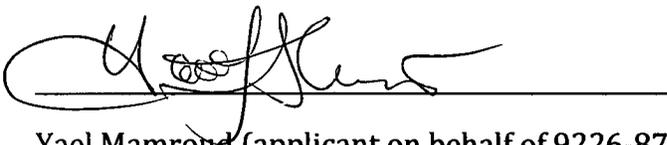
06-04-2012

And,

That the USPTO take into account and understand that this is our busiest season, and considering this, not having access to the resources we had allocated to be available to us during the proper, allotted time span,

That an extension of 180 days be strongly considered to accommodate Victoria's Secret's request for an extension of time without prejudice to us, until we are again able to properly respond to the many requests that Opposer has set forth.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read 'Yael Mamroud', is written over a horizontal line.

Yael Mamroud (applicant on behalf of 9226-8754 Quebec Inc. DBA Vitamine & Sea)

1001 Rue Lenoir, suite B-345, Montreal, Quebec H4C 2Z6

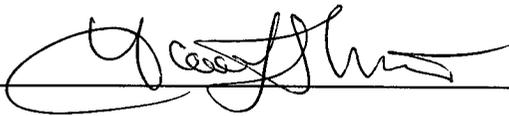
May 29, 2012.

CERTIFICATE OF POSTAL SERVICE

I hereby certify that the attached Answer to Motion to Extend Discovery was sent via regular mail to The Trademark Trial and Appeal Board on May 29, 2012.

P.O. Box 1451 Alexandria, VA 22313-1451

Respectfully,



Yael Mamroud (on behalf of Vitamine & Sea)

CERTIFICATE OF SERVICE

I hereby certify that as per the agreement of Opposer to communicate via email, a copy of this here Answer to Motion to Extend Discovery was served by email to "Calkins, Michelle" mcalkins@leydig.com and "Kevin Parks" kparks@leydig.com on May 29, 2012.

Respectfully,



Yael Mamroud (on behalf of Vitamine & Sea)