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Filing date: **01/03/2011**

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

Proceeding	91182207
Party	Plaintiff Johnson & Johnson and Roc International S.A.R.L.
Correspondence Address	BRIAN A COLEMAN DRINKER BIDDLE & REATH LLP 1500 K STREET NW, SUITE 1100 WASHINGTON, DC 20005-1209 UNITED STATES dctrademarks@dbr.com, jaye.campbell@dbr.com
Submission	Opposition/Response to Motion
Filer's Name	Jaye S. Campbell
Filer's e-mail	dctrademarks@dbr.com, brian.coleman@dbr.com
Signature	/Jaye S. Campbell/
Date	01/03/2011
Attachments	J&J_WDS Opposers' Brief in Opposition to Applicant's Motion to Amend.pdf (96 pages)(16855269 bytes)

JOHNSON & JOHNSON and,
ROC INTERNATIONAL S.A.R.L.,
Opposers,

Y.

OBSHCHESTVO S OGRANITCHENNOY
OTVESTVENNOSTIU WDS,

Applicant.

Consolidated Opposition Nos.
91-182,207 (parent)
91-184,467

Opposers, Johnson & Johnson and ROC International S.A.R.L. (together “Opposers”), respectfully submit the following brief in response to Applicant’s Motion to Amend Answer to Include Counterclaim for Partial Cancellation of Reg. No. 1015041 (“Applicant’s Motion”). Opposers oppose Applicant’s Motion for the reasons set forth below.

In this proceeding, well after discovery was closed and just days before the opening of Opposers' testimony period, Applicant filed a motion for leave to add a cancellation counterclaim. This motion is based on facts known to Applicant for at least two years, as supplemented by discovery requests served on the last day of discovery, and is patently untimely. The counterclaim also serves no "useful purpose," and thus leave to file it ought not be granted under Board precedent to that effect. The motion for leave should be denied accordingly.

Discovery opened in Opposition No. 91/182,207 (the parent opposition) on April 11, 2008. Applicant's amended Answer in the parent opposition was filed May 11, 2008 and

accepted on August 7, 2008, without objection by Opposers. Applicant's amended Answer did not include a counterclaim, but did include certain defenses, the assertion of which presumably was believed by Applicant's counsel to be grounded in the necessary factual basis and good faith under Fed. R. Civ. P. 11. One such defense pled by Applicant is that "Opposer has failed to adequately maintain . . . any trademark or proprietary rights it may have in its alleged trademarks." (Applicant's Amended Answer to Notice of Opposition dated May 19, 2008, docket entry 8.)

Also on August 7, 2008, the Board consolidated Opposition Nos. 91/184,467 and 91/182,207 and adopted the scheduling order in the later-filed opposition.

Applicant's initial discovery requests consisted of: (1) Applicant's First Set of Interrogatories served on June 23, 2008 ("Applicant's Interrogatories"); and (2) Applicant's First Request for Production of Documents also served on June 23, 2008 ("Applicant's RFPs").

Opposers' served responses and objections to Applicant's Interrogatories and RFPs on July 28, 2008. For purposes of Applicant's Motion, the relevant discovery requests are Applicant's Interrogatory No. 2, RFP No. 16, and RFP No. 17.

Applicant's Interrogatory No. 2 requested:

Identify and describe with specificity each good and service in connection with which the Opposers' Marks, or any variation thereof, have been used or is currently being used by Opposer, or any authorized user of the marks. (See **Exhibit A** hereto.)

Opposers' July 28, 2008 Response to Interrogatory No. 2 answered:

Opposers' Marks are used primarily in connection with skincare products, including, without limitation, facial serum, eye crème, hand crème, moisturizing sunscreen, night crème, daily moisturizer, facial cleaners. Additionally, Opposers refer applicant to their website, www.rocskincare.com, which contains information regarding Opposer's products bearing the ROC mark. (See **Exhibit B** hereto.)

Applicant's RFP No. 16 requested:

Representative samples of all advertising and promotional documents bearing Opposers' Marks, including, without limitation, brochures, catalogues, circulars, leaflet, direct mail pieces, newspaper and magazine advertisements, commercials, telephone book advertisements, price lists, trade association listings, annual reports, and any other material such as labels, tags, packages, containers, decals stamps, and name places used by Opposers', their distributors, or other sellers of Opposers' goods and/or services in the United States. (See **Exhibit C** hereto.)

Opposers' July 29, 2008 Response to RFP No. 16 answered:

Opposers will produce a representative sample of non-privileged, responsive documents at a mutually agreeable time and place. Additionally, Opposers refer Applicant to their website, www.rocskincare.com, which contains some sample promotional materials bearing Opposers' Marks. (See **Exhibit D** hereto.)

Applicant's RFP No. 17 requested:

Photographs or samples of all types of goods and/or services bearing or sold under Opposers' Marks in the United States. (See **Exhibit C** hereto.)

Opposers' July 29, 2008 Response to RFP No. 17 answered:

Opposers will produce a representative sample of non-privileged, responsive documents at a mutually agreeable time and place. Additionally, Opposers refer Applicant to their website, www.rocskincare.com, which contains images of product bearing Opposers' Marks. (See **Exhibit D** hereto.)

On November 12, 2008 and again on December 5, 2008, Opposers supplemented their responses to Applicant's RFP Nos. 16 & 17 by producing documents showing sample packaging and photographs of products bearing Opposers' Marks. (Documents produced by Opposers at J&J01333-01376, J&J 01567-01568, and J&J 01581-1592, attached as **Exhibit E** hereto.)

Applicant, apparently satisfied with Opposers' discovery responses, did not take further discovery on the topic of Opposers' past and/or current use of Opposers' Marks until the last day of discovery (set pursuant to Order dated June 23, 2010), 21 months later, on September 14,

Corp. v. Bravo Co., 64 U.S.P.Q.2d 1597, 1604 (T.T.A.B. 2002) (two year unjustified delay to add claim merits denial of request to amend); *see generally* T.B.M.P. § 507.02(b) (collecting cases).

B. Applicant Unreasonably Delayed Until the Final Day of the Discovery Period to Serve Additional Discovery Requests In Any Event.

Even if there were any merit to Applicant's contention that it lacked adequate factual basis to assert its counterclaim until December 2010, Applicant's delay in serving its RFAs until the *last day* of a discovery period that was open for *over two and a half years* wholly undercuts its contention that it acted with reasonable diligence in investigating the facts that it now relies upon to support its motion for leave.

Applicant's delay until September 10, 2010 is wholly unreasonable and Applicant has offered no justification for its delay. *Cf. Byer California v. Clothing for Modern Times Ltd.*, 95 U.S.P.Q.2d 1175, 1177 (T.T.A.B. 2010) (applicant's late knowledge of opposer's intended trial witness due in part to applicant's service of discovery requests on the last day of discovery); *Dating DNA LLC v. Imagini Holdings Ltd.*, 94 U.S.P.Q.2d 1889, 1893 (T.T.A.B. 2010) (explaining the importance of serving discovery requests early in the discovery period). Even if it could be contended that the information learned by Applicant in 2008 was somehow insufficient to give Applicant notice of Opposers' then-current use, at minimum it would have merited follow-up discovery. Yet in serving discovery only on the last day of discovery, Applicant well knew that it would have only days before the commencement of testimony to review that new information, and that Opposers would be prejudiced thereby. At minimum, Applicant should have served RFAs promptly after Opposers completed their discovery responses in 2008.

There is no reasonable explanation for Applicant's delay, except to infer that Applicant was attempting to ambush Opposers with grounds for a counterclaim once discovery had closed, despite Applicant's development of and satisfaction with facts allegedly supporting Applicant's counterclaim since 2008. Accordingly, Applicant's Motion should be denied.

II. Applicant's Motion Should Be Denied Because Applicant's Counterclaim Serves No Useful Purpose.

Separate and apart from the timeliness of Applicant's Motion, the Board should exercise its discretion to deny Applicant leave to amend because Applicant's proposed new claim serves no useful purpose, within the meaning of settled Board precedent.

In *Octocom*, the applicant/counterclaimant sought to amend its answer to add a claim for partial cancellation of the opposer's registration on the theory that the opposer had abandoned its registration due to nonuse on specific goods. 16 U.S.P.Q.2d at 1785. As recited by the Federal Circuit in its opinion on appeal, the Board properly denied the applicant's amendment "[b]ecause allowing the amendment would serve no useful purpose." *Id.* Specifically, in denying applicant's request to amend to assert the counterclaim, the Board found that "the likelihood-of-confusion issue without the restriction of [Opposer's] goods would be essentially the same as with the proposed restriction." *Id.*

In this case, Applicant's newly alleged counterclaim similarly serves no useful purpose. Applicant seeks to delete rouge, skin powder, and liquid foundation from one of Opposer's pleaded registrations. However, even if Applicant were to prevail on its abandonment and partial cancellation claim, Reg. No. 1,015,041 – ROC & Design would remain in force in connection with "cosmetic and skin preparations, namely, eye make-up, sun-tan cream, moisturizing cream, cleansing creams, skin creams, skin lotions and facial soap." Further, Opposers' two other pleaded registrations – Reg. No. 3,407,724 – ROC covering "facial skin lotions, skin

moisturizers, skin creams, skin toners and cleansers; body lotions; hand cream; anti-wrinkle cream; non-medicated lip protectants; and sunblock preparations” and Reg. No. 1,794,589 — ROC & Design covering “cosmetic preparations; namely, cleansing, moisturizing and body lotion, creams and suntan creams” — remain intact.

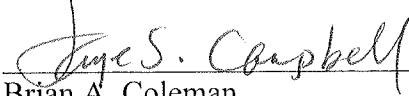
Simply put, the deletion of rouge, skin powder and liquid foundation serves no useful purpose because the underlying “likelihood-of-confusion issue without the restriction of [Opposer’s] goods would be essentially the same as with the proposed restriction.” *Id.* Valid registrations would remain for numerous other skin care goods. There is nothing about the character of the specific goods of which Applicant seeks leave to pursue cancellation that would materially alter the comparison of Applicant’s goods to Opposers’ goods in this proceeding. Regardless of the outcome of Applicant’s counterclaim, the question of likelihood of confusion will be determined based on a comparison of Opposers’ skin care goods and Applicant’s oral care goods. As such, Applicant’s Motion should be denied for this reason as well.

CONCLUSION

For the reasons set forth herein, Opposers respectfully submit that Applicant’s Motion to Amend Answer to Include Counterclaim for Partial Cancellation of Reg. No. 1015041 should be denied as untimely because Applicant unreasonably delayed in seeking leave to amend. In addition or in the alternative, Applicant’s Motion should be denied because Applicant’s counterclaim serves no useful purpose.

Respectfully submitted,

JOHNSON & JOHNSON

A handwritten signature in cursive script, reading "Jaye S. Campbell", is written over a horizontal line.

Brian A. Coleman

Jaye S. Campbell

Gayne G. Zimmerman

Drinker Biddle & Reath LLP

1500 K Street, N.W., Ste. 1100

Washington, D.C. 20005-1209

Tel: 202-842-8800

Fax: 202-842-8465

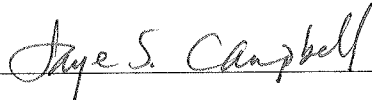
dctrademarks@dbr.com

Counsel for Opposers

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing OPPOSERS' BRIEF IN OPPOSITION TO APPLICANT'S MOTION TO AMEND ANSWER TO INCLUDE COUNTERCLAIM FOR PARTIAL CANCELLATION was served on counsel for Applicant, at the following address of record, by first class mail, postage prepaid, as well as electronic mail, this 3rd day of January 2011:

Erik M. Pelton, Esq.
Erik M. Pelton & Associates, PLLC
P.O. Box 100637
Arlington, VA 22210
emp@tm4smallbiz.com

_____

OPPOSERS' EXHIBIT A

Consolidated Opp. No. 91/182,207 (parent)

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

Johnson & Johnson and
Roc International S.A.R.L.

Opposer,

v.

WDS

Applicant.

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Opposition No. 91182207

Application. Serial No. 79032762

Mark:



APPLICANT'S FIRST SET OF INTERROGATORIES TO OPPOSER

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, 37 C.F.R. § 2.120, and the Trademark Rules of Practice, Applicant WDS ("WDS" or "Applicant"), by counsel, hereby requests that Opposers Johnson & Johnson and ROC International S.A.R.L. ("Johnson & Johnson" or "Opposers") answer fully under oath the following interrogatories within thirty (30) days after service thereof. These answers are to be sent to Erik M. Pelton & Associates, PLLC, PO Box 100637, Arlington, Virginia 22210.

Note that pursuant to the amended Trademark Trial and Appeal Board Rules, 72 Fed. Reg. 42242 (August 1, 2007), Rule 2.116(g), the Board's standard Protective Order is applicable in every pending case, including the present one, commenced on or after August 31, 2007. As a result, any objections on the basis of "confidentiality" are generally inappropriate.

DEFINITIONS

The following definitions apply to and are deemed incorporated into each question in this first set of interrogatories:

1. "Johnson & Johnson," "ROC International S.A.R.L.," "ROC International," "you," "your," or "Opposers" means Opposers Johnson & Johnson and ROC International S.A.R.L., their officers, directors, employees, counsel, agents, representatives, or other persons

9. If information is withheld on grounds of privilege or work-product immunity,
- a. Identify the information with sufficient particularity to allow the matter to be brought before the Court, including a description of the information's type (e.g. event, conversation, occurrence), subject matter, date, and participants; and
 - b. State briefly the legal and factual basis for the claim of privilege or work-product protection.

INTERROGATORIES

Interrogatory No. 1

Identify, as described in Instruction No. 3, the Opposers, Johnson & Johnson and ROC International S.A.R.L., and the nature of the relationship between the two entities.

ANSWER:

Interrogatory No. 2

Identify and describe with specificity each good and service in connection with which the **Opposers' Marks**, or any variation thereof, have been used or is currently being used by Opposer, or any **authorized user** of the marks.

ANSWER:

Interrogatory No. 3

With respect to each of the goods and services identified in response to Interrogatory No. 2, describe all relevant facts and circumstances regarding the first use of the **Opposers' marks** in interstate commerce in the United States.

ANSWER:

State with particularity the date when Opposer believes its **ROC Mark** became famous in connection with Opposers' goods or services.

ANSWER:

Interrogatory No. 18

Identify all instances within the knowledge of Opposers of dilution of the value of its **ROC Mark** as a result of the Applicant's Mark.

ANSWER:

Interrogatory No. 19

For each of the preceding Interrogatories, **identify**: all **persons** who were consulted or participated in the preparation of the answer to each Interrogatory; all **persons** who are presently knowledgeable as to any of the facts recited in the answer to each Interrogatory; whether or not such **persons** were consulted or participated in the preparation of the answer; and all files and areas searched in attempting to locate any **documents** requested to be identified by each Interrogatory.

ANSWER:

Dated: June 23, 2008

Respectfully Submitted,



Erik M. Pelton, Esq.
Attorney for Applicant

ERIK M. PELTON & ASSOCIATES, PLLC
PO Box 100637
Arlington, Virginia 22210
(703) 525-8009

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Applicant's First Set of Interrogatories to Opposer was deposited as First Class mail with the United States Postal Service on June 23, 2008, to counsel for Opposer at:

Mary Pat A. Weyback
Drinker Biddle & Reath LLP
1500 K Street, N.W., Ste. 1100
Washington, DC 20005-1209

By:



Erik M. Pelton, Esq.

OPPOSERS' EXHIBIT B

Consolidated Opp. No. 91/182,207 (parent)

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

<u>JOHNSON & JOHNSON and</u>	:	
ROC INTERNATIONAL S.A.R.L.,	:	
	:	
Opposers,	:	
	:	
v.	:	Opposition No. 91/182,207
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OBSHESTVO S OGRANITCHENNOY;	:	
OTVETSTVENNOSTIU WDS,	:	
	:	
<u>Applicant.</u>	:	

**OPPOSERS' ANSWERS AND OBJECTIONS TO
APPLICANT'S FIRST SET OF INTERROGATORIES**

Opposers, Johnson & Johnson and ROC International S.A.R.L. ("Opposers"), by their attorneys, respond to Applicant, WDS ("Applicant's"), First Set of Interrogatories as follows:

GENERAL OBJECTIONS

The following General Objections pertain to each of Applicant's Interrogatories unless otherwise specified.

1. Opposers object to the "Instructions" prefacing each of Applicant's Interrogatories to the extent that those Instructions purport to impose any obligation that is not contained in, or is more expansive than, the Federal Rules of Civil Procedure or the Trademark Rules of Practice.
2. Pursuant to Fed. R. Civ. P. 33 and Trademark Rule 2.120(d)(1), Opposers object to the Interrogatories to the extent they exceed seventy-five (75), counting subparts, in number.
3. Opposers object to the Interrogatories to the extent that they seek the production of information protected by the attorney-client privilege and/or attorney-work product doctrine or exemption, or any other privilege. Opposers will not disclose such privileged information and

Interrogatory No. 2

Identify and describe with specificity each good and service in connection with which the **Opposers' Marks**, or any variation thereof, have been used or is currently being used by Opposer, or any **authorized user** of the marks.

ANSWER: Opposers' Marks are used primarily in connection with skincare products including, without limitation, facial serum, eye crème, hand crème, moisturizing sunscreen, night crème, daily moisturizer, facial cleansers. Additionally, Opposers refer applicant to their website, www.rocskincare.com, which contains information regarding Opposers' product bearing the ROC mark.

Interrogatory No. 3

With respect to each of the goods and services identified in response to Interrogatory No. 2, describe all relevant facts and circumstances regarding the first use of the **Opposers' marks** in interstate commerce in the United States.

ANSWER: Opposers object to this Interrogatory on the grounds that it is overbroad and unduly burdensome insofar as it seeks information spanning over two decades of use in commerce in the United States. Due to substantial personnel movement and the passage of time, such information is not likely to be readily available. Notwithstanding and without waiving these objections and the general objections, Opposers state that ROC mark was first used in connection with the goods recited in Reg. No. 3,407,724 – ROC as early as 1984. The ROC & Design mark was first used in connection with the goods recited in Reg. No. 1,794,589 as early as 1984. Opposers' search for information responsive to this Interrogatory is ongoing, and Opposers will update their response, as appropriate.

VERIFICATION

I, Suzanne V. Papp, declare that I have been warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, pursuant to Section 1001 of Title 18 and that they may jeopardize the Opposer in the above-identified proceeding, that I have read the responses to Applicant's First Set of Interrogatories, and that the responses thereto are true or on information and belief are believed to be true.

By: Suzanne V. Papp

Title: Product Director

DC01/2122299.1

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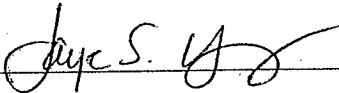
AUG 01 '08 03:44PM CPI MARKETING 908 874 1233

08/01/2008 14:44 IFAX

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **OPPOSERS' ANSWERS AND
OBJECTIONS TO APPLICANT'S FIRST SET OF INTERROGATORIES** was served on
Applicant this 28th day of July 2008, via first-class mail to:

Erik M. Pelton Esq.
ERIK M. PELTON & ASSOCIATES, PLLC
P.O. Box 100637
Arlington, VA 22210

_____

OPPOSERS' EXHIBIT C

Consolidated Opp. No. 91/182,207 (parent)

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

Johnson & Johnson and
Roc International S.A.R.L.

Opposer,

v.

WDS

Applicant.

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Opposition No. 91182207

Application. Serial No. 79032762

Mark:



**APPLICANT'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Trademark Rules of Practice, Applicant, WDS ("WDS" or "Applicant"), by counsel, hereby requests that Opposers Johnson & Johnson and ROC International S.A.R.L. ("Johnson & Johnson" or "Opposers") produce the following documents and things that are in Opposers' possession, custody, or control. These documents and things are to be produced, or made available for copying and inspection, at the offices of Erik M. Pelton & Associates, PLLC, PO Box 100637, Arlington, Virginia 22210, within thirty (30) days of service hereof.

Note that pursuant to the amended Trademark Trial and Appeal Board Rules, 72 Fed. Reg. 42242 (August 1, 2007), Rule 2.116(g), the Board's standard Protective Order is applicable in every pending case, including the present one, commenced on or after August 31, 2007. As a result, any objections on the basis of "confidentiality" are generally inappropriate.

DEFINITIONS

The following definitions apply to and are deemed incorporated into each of the requests to produce herein.

1. "Johnson & Johnson," "ROC International S.A.R.L.," "ROC International,"

13. Representative samples of documents and things referring to, relating to, or commenting upon Opposers' advertising and/or promotional expenditures for any goods and/or services sold under Opposers' Marks since 2000, or any variation thereof.

14. Representative samples of all documents and things referring to or regarding any advertisements, promotions, or sales of Opposers' goods or services via any third party distributor that have utilized Opposers' Marks since 2000, including, but not limited to, documents specifying the third party distributor, the goods and/or services involved, and the timeframe during which such advertisement, promotion, or sale occurred.

15. Representative samples of all documents identifying the publications and broadcast media in which Opposers have advertised, is advertising, or has plans to advertise any of its products or services bearing or sold under Opposers' Marks in the United States, including, but not limited to, the Internet.

16. Representative samples of all advertising and promotional documents bearing Opposers' Marks, including, without limitation, brochures, catalogues, circulars, leaflets, direct mail pieces, newspaper and magazine advertisements, commercials, telephone book advertisements, price lists, trade association listings, annual reports, and any other material such as labels, tags, packages, containers, decals, stamps, and name plates used by Opposers', their distributors, or other sellers of Opposers' goods and/or services in the United States.

17. Photographs or samples of all types of goods and/or services bearing or sold under Opposers' Marks in the United States.

18. All documents and things referring to, relating to, or comprising any consumer or market survey, test, or study Opposers have conducted or has caused to be conducted regarding the following:

32. All documents and things, other than those produced in response to any of the foregoing requests, upon which Opposers intends to rely in connection with this Opposition proceeding.

Dated: June 23, 2008

Respectfully Submitted,



By: _____

Erik M. Pelton, Esq.
Attorney for Applicant

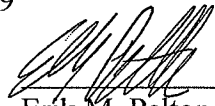
ERIK M. PELTON & ASSOCIATES, PLLC
PO Box 100637
Arlington, Virginia 22210
(703) 525-8009

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Applicant's First Request for Production of Documents and Things was deposited as First Class mail with the United States Postal Service on June 23, 2008, to the following:

Mary Pat A. Weyback
Drinker Biddle & Reath LLP
1500 K Street, N.W., Ste. 1100
Washington, DC 20005-1209

By:



Erik M. Pelton, Esq.

OPPOSERS' EXHIBIT D

Consolidated Opp. No. 91/182,207 (parent)

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

JOHNSON & JOHNSON and
ROC INTERNATIONAL S.A.R.L.,

Opposers,

v.

Opposition No. 91/182,207

OBSHESTVO S OGRANITCHENNOY;
OTVETSTVENNOSTIU WDS,

Applicant.

**OPPOSERS' RESPONSES AND OBJECTIONS TO APPLICANT'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Opposers Johnson & Johnson and ROC International S.A.R.L. ("Opposers"), by their attorneys, respond to Applicant, WDS ("Applicant's") First Request for Production of Documents and Things as follows.

Opposers hereby incorporate by reference all General Objections set forth in their Answers and Objections to Applicant's First Set of Interrogatories, replacing the word "Interrogatory(ies)" with "Document Request(s)" where necessary. Opposers object to the "Instructions" and "Definitions" prefacing each of Applicant's document requests to the extent that those Instructions and Definitions purport to impose any obligation that is not contained in, or is more expansive than, the Federal Rules of Civil Procedure or the Trademark Rules of Practice.

All responses herein are subject to the specific objections set forth below, and to avoid duplication and repetition, each response is also subject to the General Objections.

REQUESTS FOR PRODUCTION

1. All documents and things referring to, relating to, comprising, or commenting on any entity associated with Opposers that relates to the use of Opposers' Marks, including, but not

disclosure of which would cause Opposers economic and competitive harm. Notwithstanding these objections and the general objections, Opposers' investigation is ongoing and, to the extent such documents exist, Opposer will produce a representative sample of non-privileged, responsive documents at a mutually agreeable time and place upon entry of a mutually agreeable amended protective order.

16. Representative samples of all advertising and promotional documents bearing Opposers' Marks, including, without limitation, brochures, catalogues, circulars, leaflets, direct mail pieces, newspaper and magazine advertisements, commercials, telephone book advertisements, price lists, trade association listings, annual reports, and any other material such as labels, tags, packages, containers, decals, stamps, and name plates used by Opposers', their distributors, or other sellers of Opposers' goods and/or services in the United States.

RESPONSE: Without waiving the general objections, Opposers will produce a representative sample of non-privileged, responsive documents at a mutually agreeable time and place. Additionally, Opposers refer Applicant to their website, www.rocskincare.com, which contains some sample promotional materials bearing Opposers' Marks.

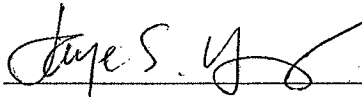
17. Photographs or samples of all types of goods and/or services bearing or sold under Opposers' Marks in the United States.

RESPONSE: Without waiving the general objections, Opposers will produce a representative sample of non-privileged, responsive documents at a mutually agreeable time and place. Additionally, Opposers refer Applicant to their website, www.rocskincare.com, which contains images of product bearing Opposers' Marks.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **OPPOSERS' RESPONSES AND OBJECTIONS TO APPLICANT'S FIRST REQUEST FOR DOCUMENTS AND THINGS** was served on Applicant this 28th day of July 2008, via first-class mail to:

Erik M. Pelton Esq.
ERIK M. PELTON & ASSOCIATES, PLLC
P.O. Box 100637
Arlington, VA 22210

A handwritten signature in dark ink, appearing to read "Erik M. Pelton", is written over a horizontal line.

OPPOSERS' EXHIBIT E

Consolidated Opp. No. 91/182,207 (parent)

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

Johnson & Johnson and Roc International
S.A.R.L.

Opposers,

v.

Obschestvo s Oranitchennoy; Otvetstvennostiu
"Wds",
Applicant.

Opposition No. 91182207 (parent)
91184467

Application Serial No. 79032762

Mark:

R.O.C.S.
REMINERALIZING ORAL CARE SYSTEMS

APPLICANT'S FIRST REQUESTS FOR ADMISSION TO OPPOSER

Applicant Obschestvo s Oranitchennoy; Otvetstvennostiu "Wds" ("Applicant"), by counsel, hereby request that Opposers Johnson & Johnson and Roc International S.A.R.L. ("Opposer") admit or deny the following statements of law and fact. If objection is made, please state the reason for the objection, and set forth in detail the reasons why Opposer cannot truthfully admit or deny the matter. Responses to these requests are subject to TBMP § 407.03(b) (footnotes omitted), which states that:

An answer must admit the matter of which an admission is requested; deny the matter; or state in detail the reasons why the responding party cannot truthfully admit or deny the matter. "A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify an answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless the party states that the party has made reasonable inquiry and that the information known or readily obtainable by the party is insufficient to enable the party to admit or deny."

If the responding party objects to a request for admission, the reasons for objection must be stated. If a responding party believes that a matter of which an

36. Admit that Opposers do not currently offer “eye make-up” in connection with Opposers’ ROC marks in the United States.

37. Admit that Opposers do not currently offer “liquid foundation” in connection with Opposers’ ROC marks in the United States.

38. Admit that Opposers do not currently offer “skin powder” in connection with Opposers’ ROC marks in the United States.

39. Admit that Opposers do not currently offer “rouge” in connection with Opposers’ ROC marks in the United States.

40. Admit that Opposers do not currently offer “facial soap” in connection with Opposers’ ROC marks in the United States.

41. Admit that Opposers do not currently offer “skin powder” in connection with Opposers’ ROC marks in the United States.

42. Admit that Opposers do not currently offer “hand cream” in connection with Opposers’ ROC marks in the United States.

43. Admit that Opposers do not currently offer “non-medicated lip protectants” in connection with Opposers’ ROC marks in the United States.

44. Admit that Opposers do not currently offer “sunblock preparations” in connection with Opposers’ ROC marks in the United States.

Dated this 14th day of September, 2010.



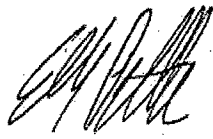
Erik M. Pelton
ERIK M. PELTON & ASSOCIATES, PLLC
PO Box 100637
Arlington, Virginia 22210
TEL: (703) 525-8009
FAX: (703) 525-8089

Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of Applicant's First Requests for Admission to Opposer has been served on the following by delivering said copy on September 14, 2010, via First Class Mail, to counsel for Opposer at the following address:

BRIAN A. COLEMAN
DRINKER BIDDLE & REATH LLP
1500 K STREET NW, SUITE 1100
WASHINGTON, DC 20005-1209

By: 

Erik M. Pelton, Esq.

OPPOSERS' EXHIBIT F

Consolidated Opp. No. 91/182,207 (parent)



THE anti-aging SKIN CARE experts

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FIND RoC® PRODUCTS:

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[Lift & Define](#)

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THE PROMISE 10 Years Back*

THE PROOF

Up to 7x
more effective
than another leading brand in
visibly diminishing signs of aging



Learn more about the
RoC® RETINOL
CORREXION®
Night Cream
clinical study



2007 Allure
Best of Beauty
Editor's Choice Award
for best hand cream

Don't let your hands
give away your age.

[FIND OUT HOW](#)

Click here
to save \$3
on your next
RoC® purchase

RoC® WE KEEP OUR PROMISES

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*Claims are substantiated by a peer-reviewed clinical study
conducted by a leading dermatologist. The study tested the efficacy of
RoC Retinol Correxion Night Cream on deep wrinkles.
See www.roc.com for details.

THE anti-aging SKIN CARE experts

CONTACT US WHERE TO BUY

Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

Multi-Benefit

THE SKIN CARE LEADER
IN FRANCE SINCE 1957

Our Heritage

Our
PROMISE to you



RoC® products are developed through strong partnerships with dermatologists, contain pure, active ingredients and are clinically proven to deliver visible and lasting results for healthier, younger-looking skin.

Most importantly, RoC® products work to improve the skin's health, they don't just mask the symptoms. They improve the appearance of your skin and are suitable for all skin types.

From research and development, through clinical trials, consumer tests, manufacturing, and quality control, RoC® ensures at every step that the promises it makes are being kept.

OUR HISTORY OF SKIN CARE EXPERTISE

RoC® was founded in France in 1957 by pharmacist Jean-Charles Lissarague and a collaboration of dermatologists. From the beginning, RoC® developed strong partnerships with dermatologists, helping it become the skincare leader in France. In 1999, RoC® brought its anti-aging expertise to the U.S. Since then, RoC® has continued to build on its unique understanding of the skin aging process to develop the best and most effective skin care solutions for women in the U.S. RoC® products in the U.S. are not only derived from extensive research and thorough clinical studies, but also from a proven track record of success with European women.

OUR CONTINUED INNOVATION

Since its beginning, RoC® has always been at the forefront of skin care innovation. A few of its significant contributions to the skin care industry include:

- 1957: The origins of RoC® began with the development of the first hypoallergenic skincare products
- 1987: RoC® became the first to prove non-comedogenicity (products that don't clog pores) based on a patented method of testing developed at the RoC® Skin Research Center
- 1995: RoC® developed RETINOL ACTIF PUR®, the first pure and stabilized form of Vitamin A, a pioneer treatment in the visible reduction of wrinkles
- 2003: RoC® leveraged the anti-aging properties of soy with the development of its RoC® Soy Complex, a complete form of soy that is proven to provide several anti-aging benefits

OUR DISTRIBUTION

RoC® products are primarily sold in the skin care sections of drug stores nationwide. Many of these stores provide beauty advisors to assist you in your beauty and skin care purchases. We encourage you to ask these consultants for more information on our products, or to help you find the best RoC® product to fit your need.

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THE SKIN CARE LEADER
IN FRANCE SINCE 1957

THE anti-aging SKIN CARE experts

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Anti-Wrinkle

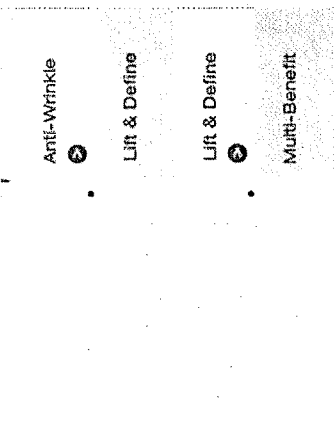
Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

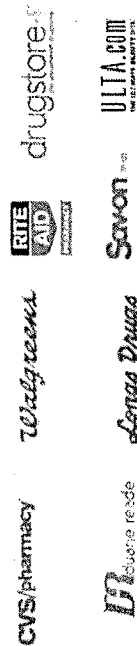
Multi-Benefit



Where to Buy

RoC® products are sold primarily in the skin care sections of drug stores nationwide. Some stores provide beauty advisors to assist you in your beauty and skin care purchases. We encourage you to ask these consultants for more information on our products, or to assist you in finding the best RoC® product to fit your need.

Look for RoC® products at the stores listed below. Just click on the logo to be taken to that retailer's website. Some even offer online shopping.



LOCATE A STORE NEAR YOU

If you would like to find the store nearest you that carries a particular RoC® product, please call 1-800-RoC-1964 (1-800-762-1964) and use our automated product locator.

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Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

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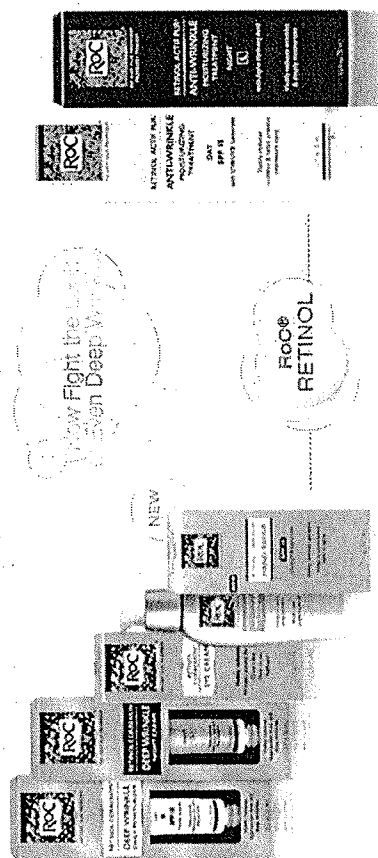
Multi-Benefit

Anti-Wrinkle

Retinol — one of the most effective ingredients for reducing the appearance of lines and wrinkles

RoC® RETINOL CORREXION®

RoC® RETINOL ACTIF PUR®



Visibly reduces even deep wrinkles.

RoC® was the first to formulate stabilized Retinol and has become an expert in this anti-aging ingredient. Learn more about what RoC® Retinol can do for your skin.

Visibly reduces fine lines and wrinkles.

Available in:

- > [Deep Wrinkle Daily Moisturizer SPF 15](#)
- > [Deep Wrinkle Night Cream](#)
- > [Eye Cream](#)
- > [Deep Wrinkle Serum](#)
- > [Hand Repair SPF 15](#)

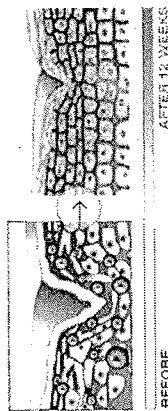
Available in:

- > [Daily Moisturizer](#)
- > [Night Moisturizer](#)

HOW CAN RoC® RETINOL IMPROVE MY SKIN?

When you are young, your skin cells continuously renew themselves, which keeps your skin looking smooth. As time passes, however, your skin's ability to renew itself gradually slows down. Skin loses its elasticity and wrinkles become more evident. What you need is something to help stimulate your skin's renewal process to help keep it looking younger and healthier. This is the benefit of Retinol. Retinol is a pure form of Vitamin A — originally stabilized by RoC® — that works to stimulate skin renewal and reduce the appearance of wrinkles.

The image below illustrates how RoC® Retinol works to stimulate the skin's renewal process and smooth the appearance of wrinkles. Notice how the skin is renewed and looks smoother and tighter.



HOW IS RoC® RETINOL DIFFERENT FROM OTHER RETINOLS?

RoC® was the first to develop and patent the technology needed to stabilize and package Retinol in its pure and effective form. From the beginning, RoC® set very high standards in clinical testing, using subjects with visible signs of aging to measure visible and lasting results. The Retinol technology used by RoC® stems from over 15 years of research that has resulted in the issuance of 13 U.S. patents.

ADVICE FOR GETTING THE BEST RESULTS FROM RETINOL PRODUCTS:

- Start early:** It is often recommended to begin using a Retinol product in your late twenties to early thirties. Early use of Retinol products can actually help to combat fine lines and wrinkles before they become apparent, so your skin stays looking younger and healthier.
- Start Slowly:** Using Retinol is like exercising. You don't start out running a marathon. Begin by applying a small amount (a little goes a long way) every other day for about two weeks. After two weeks, you may begin applying more frequently until find the best routine for your skin.
- Stick with It:** It is important to be compliant, as the benefits of Retinol are seen over time. If you happen to experience minor skin irritation, this may be temporary while your skin adjusts to the products. Just decrease usage for a few days and work your way back up after that.
- Protect your skin:** Whether you use a Retinol product during the night or day, always remember to wear a sunscreen of SPF 15 or higher during the day.

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CONTACT US WHERE TO BUY

Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

Multi-Benefit

Lift & Define

Clinically proven to visibly lift and define your skin

ROC PROTIENT® Fortify



NEW

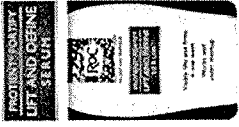
ROCK YOUR PROBLEM



ROCK YOUR PROBLEM



ROCK YOUR PROBLEM



ROCK YOUR PROBLEM



ROCK YOUR PROBLEM



ROCK YOUR PROBLEM

- Clinically Shown to:
- Increase Firmness
 - Improve Elasticity
 - Visibly Lift the Skin
 - Improve Definition of Facial Contours

PROTIENT® Fortify is available in three clinically tested formulations:

- > Fortify Lift and Define Night Cream
- > Fortify Lift and Define Serum
- > Fortify Lift and Define Eye Cream

RoC® PROTIENT® Fortify Lift and Define Night Cream

←
RoC® PROTIENT® Fortify Lift and Define Night Cream
Helps restore strength to your skin and is clinically proven to increase firmness, improve elasticity, and visibly lift and define facial contours.

WHAT RESULTS CAN I EXPECT?

- + Immediately:
 - Skin is smoothed and softened
 - Elasticity is improved
- + After 4 Weeks:
 - Skin is firmer
 - Fine lines are visibly reduced
- + After 8 Weeks:
 - Facial features are lifted
 - Definition along jawline, chin, and eye contour is improved

HOW IT WORKS

The rich, moisturizing cream immediately hydrates and softens your skin with a nourishing blend of glycerin and vitamin E. While you sleep, the formula's patented technology, DMAE - a high performance tightening agent - works within your skin's surface to help strengthen and tone skin.

[Back to top](#)

RoC® PROTIENT® Fortify Lift and Define Serum

←
RoC® PROTIENT® Fortify Lift and Define Serum
Helps strengthen and tone skin. It visibly lifts and firms and works well under makeup.

RESULTS AFTER 1 WEEK IN CLINICAL TESTING

- + 78% had firmer skin
- + 78% had visible reductions in fine lines
- + 81% had improved definition of facial contours
- + 85% had more lifted skin
- + 93% had smoother skin

HOW IT WORKS

This smooth, silky fluid glides on easily and absorbs quickly, leaving your skin feeling smooth and velvety. Once absorbed, the formula's patented technology, DMAE - a high performance tightening agent - works within your skin's surface to help strengthen and tone skin. Immediately, skin is smoother and firmer, with even greater results over time.

[Back to top](#)

RoC® PROTIENT® Fortify Lift and Define Eye Cream



RoC® PROTIENT® Fortify Lift and Define Eye Cream

Increases skin firmness around the eyes, visibly lifts eyelids, and reduces puffiness to make eyes look younger and more awake.



Visibly lifts eyelids
From the second eye
Reduces puffiness

0.5 fl. oz. (15 mL)



HOW IT WORKS

The light, silky fluid absorbs quickly and begins working immediately with a unique blend of wheat polymer and DMAE - a high performance tightening agent - to help strengthen and tone the skin around your eyes.

[Back to top](#)

WHAT RESULTS CAN I EXPECT?

- + Immediately:
 - Elasticity around the eye is improved
 - Fine lines are visibly reduced
- + After 4 Weeks:
 - Skin around eye is smoother
 - Puffiness is reduced
- + After 8 Weeks:
 - Eyelids are lifted
 - Skin around eye is firmer

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THE anti-aging SKIN CARE experts

CONTACT US WHERE TO BUY

Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

Multi-Benefit

Multi-Benefit

clinically proven to not only fight wrinkles, but visibly reduce age spots

RoC® AGE DIMINISHING® Products

RoC® SOY COMPLEX

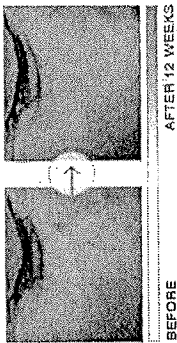
RoC® Soy Complex is a patent-pending breakthrough in skincare technology, clinically proven to visibly reduce multiple signs of aging.

Benefits

RoC® AGE DIMINISHING® Products are clinically proven to:

- + Visibly diminish age spots
- + Improve skin tone
- + Reduce the appearance of wrinkles
- + Provide superior moisturizing benefits

CLINICALLY PROVEN RESULTS



Multi-benefit Moisturizers:

- > [Daily Moisturizer](#)
- > [Moisturizing Night Cream](#)
- > [Facial Cleanser](#)

HOW IT WORKS

By using soy in its complete form, RoC® scientists are able to keep intact its essential active components, proteins, lipids, and anti-oxidants. This maximizes its effectiveness in producing a range of visible skincare benefits, such as revitalizing skin tone, diminishing the appearance of age spots, and visibly reducing fine lines and wrinkles.

In clinical trials, more than 85% of women noticed a visible improvement in just two weeks.

RoC® AGE DIMINISHING® Daily Moisturizer SPF 15

RoC® AGE DIMINISHING® Daily Moisturizer SPF 15
Enriched with RoC® Soy Complex and Vitamin E, it visibly reduces the signs of aging while SPF 15 UVA/UVB sunscreens protect your skin from the sun and help prevent the signs of premature aging.



"Best of Beauty"
Editor's Pick for best
anti-aging treatment
- September 2004



AGE
DIMINISHING®
DAILY MOISTURIZER
SPF 15
NET WT. 1.7 OZ (48g)
Soy Complex

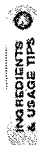


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RoC® AGE DIMINISHING® Moisturizing Night Cream



ROC® AGE DIMINISHING® Night Cream
Enriched with RoC® Soy Complex and Vitamin E, it visibly reduces the signs of aging while hydrating emollients replenish your skin's moisture levels while you sleep.



[Back to top](#)

ROC® AGE DIMINISHING® Facial Cleanser

ROC® AGE DIMINISHING®

Facial Cleanser with
Conditioning Soy Extracts gently
cleanses while helping to keep
skin soft, smooth, and younger-
looking

Benefits

This gentle cleanser is an ideal first step
to your anti-aging regimen:

- + Gently lifts away dirt, oil and makeup
- + Helps to even skin tone
- + Smoothes and softens skin's texture
- + Helps skin look and feel healthier



AGE DIMINISHING®
FACIAL CLEANSER

Conditioning Soy Extracts
Gentle Cleanser

Conditioning Soy Extracts
Gentle Cleanser

Conditioning Soy Extracts
Gentle Cleanser

Conditioning Soy Extracts
Gentle Cleanser

SELF
HEALTHY BEAUTY
AWARD WINNER
2005

"Best Anti-Aging Cleanser"
Winner! 2005

HOW IT WORKS

RoC® AGE DIMINISHING® Facial Cleanser is a gentle cleanser that lifts away dirt, oil, and makeup without stripping your skin of its natural moisture balance. This is very important because harsh, abrasive cleansers can make wrinkles appear more evident and make your anti-aging treatment have to work harder. In addition, it is enriched with Conditioning Soy Extracts, and helps to visibly even skin tone and reduce rough surface skin to reveal softer, smoother, younger-looking skin.

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THE anti-aging SKIN CARE experts

CONTACT US WHERE TO BUY

Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

Multi-Benefit



THE SKIN CARE LEADER
IN FRANCE SINCE 1957

Clinical Study

THE ANTI-AGING POWER OF RoC® RETINOL

When you're young, skin cells continuously renew themselves, which helps keep your skin looking smooth and wrinkle-free. As time passes, however, your skin's ability to renew itself gradually slows down. Skin loses its elasticity and wrinkles become more evident. RoC® RETINOL diminishes these signs of aging to complement your skin's renewal process. The result—younger-looking, more beautiful skin.

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Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

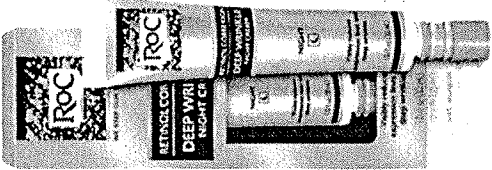
Multi-Benefit

Multi-Benefit

Anti-Wrinkle

RoC® RETINOL CORREXION®

Give 10 years back to the look of your skin*



Anti-Wrinkle

RoC® RETINOL CORREXION®

Give 10 years back to the look of your skin*

RETINOL CORREXION®

Deep Wrinkle Night Cream

The only moisturizer clinically proven to give 10 years back to the look of your skin.* This exclusive combination contains pure RoC®Retinol plus essential minerals, and is clinically proven to visibly reduce wrinkles while you sleep.

Benefits

This advanced formula is clinically proven to:

- + Diminish the appearance of expression lines
- + Visibly reduce even deep wrinkles
- + Moisturize skin throughout the night
- + Leave skin smoother and younger-looking

CLINICALLY PROVEN RESULTS

BEFORE **AFTER 12 WEEKS**

"Best of Beauty" Editor's Pick for best anti-aging treatment

September 2004

INGREDIENTS & USAGE TIPS

Click here to find out more about the dermatologist led clinical studies behind RoC® RETINOL CORREXION®.

Also available in:

- > [Daily Moisturizer](#)
- > [Eye Cream](#)
- > [Deep Wrinkle Serum](#)

HOW IT WORKS

The formula contains a combination of RoC® Retinol and a mineral complex of magnesium, zinc, and copper that has been optimized to improve the appearance of even deep wrinkles. RoC® RETINOL CORREXION® Deep Wrinkle Night Cream is formulated to work through the night when your skin is most receptive. As you apply, the upper layers of your skin are firmed, leading to a visible reduction in expression lines. Then, through the night, the formula works to smooth even your deep wrinkles.

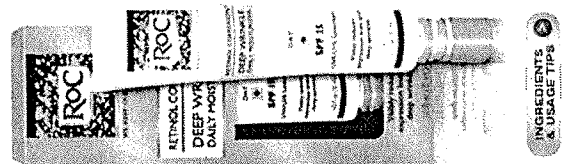
What results can I expect?

- + After first application, skin looks smoother
- + After 4 weeks, skin looks noticeably firmer. Fine lines and wrinkles are visibly diminished
- + After 12 weeks, even deep wrinkles are visibly diminished

TIP If you've never used a Retinol product before, be sure to read our [Ingredients and Usage Tips](#).

* Diminished appearance of wrinkles after 12 weeks use of RoC® RETINOL CORREXION® Deep Wrinkle Night Cream in a clinical study. Results may vary.

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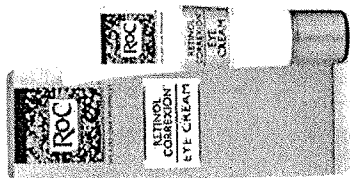


RoC® RETINOL CORREXION® Deep Wrinkle Daily Moisturizer SPF 15

← **RoC® RETINOL CORREXION® Deep Wrinkle Daily Moisturizer SPF 15**
Helps to visibly reduce expression lines and the appearance of deep wrinkles while protecting your skin from the sun's harmful rays. Enriched with Vitamin E and SPF 15 UVA/UVB sunscreens, it also helps protect the skin from UVA rays that may contribute to skin damage and premature aging.

TIP If you've never used a Retinol product before, be sure to read our [Ingredients and Usage Tips](#).

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INGREDIENTS
& USAGE TIPS

RoC® RETINOL CORREXION® Eye Cream

RoC® RETINOL CORREXION® Eye Cream

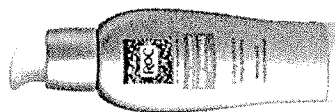
Specially formulated for the delicate eye area, it visibly reduces wrinkles around the eyes and crow's feet in 12 weeks. In addition, it evens out dark circles and reduces puffiness in 4 weeks.



2006 CLEW Beauty Awards Winner
Best New Facial Skincare
Eye Treatment Under \$20

TIP If you've never used a Retinol product before,
be sure to read our [Ingredients and Usage Tips](#).

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INGREDIENTS
& USAGE TIPS

RoC® RETINOL CORREXION® Deep Wrinkle Serum

RoC® RETINOL CORREXION® Deep Wrinkle Serum

Stimulates your skin's renewal process and is clinically proven to visibly reduce both fine lines and deep wrinkles.

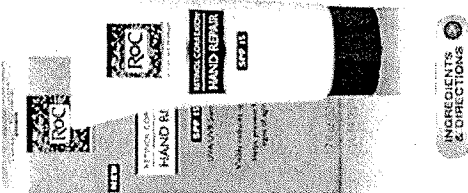
RESULTS AFTER 12 WEEKS

- After four weeks:
 - Skin is more radiant
 - Fine lines on face and neck are smoothed
 - Skin firmness is improved
- After 8 weeks:
 - Crow's feet are visibly reduced
 - Signs of photodamage are diminished
- After 12 weeks:
 - Deep wrinkles on face and neck are visibly reduced

HOW IT WORKS

This light, silky fluid glides on easily and absorbs quickly, leaving your skin feeling smooth and velvety. The formula's patented technology combines pure RoC® RETINOL with magnesium, zinc, and copper to stimulate the skin's renewal process and bring newer, younger-looking skin to the surface.

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RoC® RETINOL CORREXION® Hand Repair SPF 15

RoC® RETINOL CORREXION® Hand Repair SPF 15

This revolutionary formula not only moisturizes but is uniquely formulated with pure RoC® Retinol and an essential mineral complex – a powerful, combination that has been scientifically shown to work within the skin's surface layers to reduce the visible signs of aging.

When used daily, RoC® RETINOL CORREXION® Hand Repair SPF 15 fortifies the outer layer of skin and is clinically shown to even out the look of discolorations and age spots for more youthful looking hands.

In addition, its SPF 15 UVA/UVB sunscreen protects hands from damaging UVA rays that may contribute to skin damage and premature aging of the skin.



2007 Allure Best of Beauty
Editors' Choice Award
for best hand cream

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100%

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Anti-Wrinkle

Lift & Define

Lift & Define

Multi-Benefit

Multi-Benefit

THE SKIN CARE LEADER
IN FRANCE SINCE 1957

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By filling out the registration for this promotion, you agree to receive additional news/product information/future promotions from RoC®. The information you submit with the registration will be governed by our site's [Privacy Policy](#). To stop receiving additional communications, please contact us as specified in our site's [Privacy Policy](#).

*Required Field

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Last Name:*

E-mail:*

Re-enter e-mail:*

Address:*

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City:*

State:*

Zip Code:*

Gender:

☐ Female ☐ Male

J&J 01350

Birthdate:*

How did you hear about rocskincare.com?*

Are you currently a RoC® user?*

☐ Yes ☐ No

☐ I would like to be contacted with news about your company and its other brands.

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THE anti-aging SKIN CARE experts

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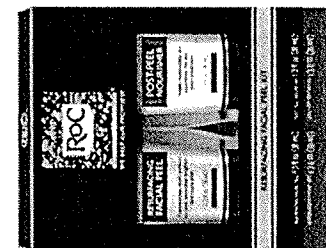
FIND RoC PRODUCTS:

Anti-Wrinkle	Lift & Define	Multi-Benefit	Facial Peel
--------------	---------------	---------------	-------------

Facial Peel

Clinically proven to visibly reduce fine lines and age spots.

RoC® Resurfacing Facial Peel Kit



RoC® Resurfacing Facial Peel Kit
 Renews, retextures, and rejuvenates skin's surface. RoC® Resurfacing Facial Peel Kit is an at-home facial resurfacing treatment that works to smooth the appearance of fine lines, reduce rough surface skin, diminish signs of photodamage caused by the sun, and even skin tone.

WHAT RESULTS CAN I EXPECT?

- + Immediately:
 - Skin texture is smoothed
 - Skin tone is brightened and more radiant
- + 4 Weeks:
 - Fine lines are visibly reduced
 - Skin tone is more even
- + 7 Weeks:
 - Age spots are visibly diminished
 - Appearance of overall photodamage is reduced

HOW IT WORKS

Step 1: Resurfacing Facial Peel

This unique treatment developed by RoC® skincare scientists and a collaboration of dermatologists utilizes an innovative, patented technology. Ultra micro-particles - gentle polishing beads - accelerate the remove of dead skin cells, while active enzymes gently resurface your skin to reveal a younger-looking, rejuvenated you.

Step 2: Post-Peel Nourisher

This nourishing cream is an essential part of the Resurfacing Facial Peel Kit. Enriched with vitamin E and glycerin, it soothes and deeply moisturizes skin after treatment.

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THE anti-aging SKIN CARE experts

CONTACT US WHERE TO BUY

Anti-Wrinkle

Anti-Wrinkle

Lift & Define

Lift & Define

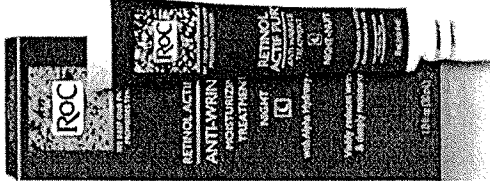
Multi-Benefit

Multi-Benefit

Anti-Wrinkle

RoC® RETINOL ACTIF PUR®

Clinically proven to visibly reduce fine lines and wrinkles in just 4 weeks



RETINOL ACTIF PUR®
ANTI-WRINKLE
TREATMENT
NIGHT
with Alpha Hydroxy
Acids

RoC® RETINOL ACTIF PUR® Anti-Wrinkle Moisturizing Treatment - Night

←

RoC® RETINOL ACTIF PUR® Anti-Wrinkle Moisturizing Treatment - Night

Benefits

This highly effective moisturizer is clinically proven to:

- + Visibly reduce fine lines and wrinkles in just 4 weeks
- + Renew skin's surface
- + Uncover smoother, younger-looking skin
- + Moisturize throughout the night

Also available in:

> Daily Moisturizer

Best of Beauty
Editor's Pick for best anti-aging treatment

- September 2003

INGREDIENTS & USAGE TIPS

HOW IT WORKS

This treatment uses an advanced delivery system that works continuously throughout the night to smooth the appearance of wrinkles and renew your skin's surface as you sleep. First, glycolic acid exfoliates away the dead upper layers of your skin, revealing newer, younger-looking skin. Next, retinol is gradually released into the skin's surface over the next 12 hours to stimulate skin renewal and visibly smooth wrinkles. With regular use, skin looks smoother, younger, and more radiant.

What results can I expect?

- After first application, skin looks smoother
- After 4 weeks, fine lines and wrinkles are visibly reduced and skin looks more radiant
- After 8 weeks, the appearance of lines and wrinkles is even further diminished, and skin tone is more even

TIP If you've never used a Retinol product before, be sure to read our [Ingredients and Usage Tips](#).

RoC® RETINOL ACTIF PUR® Anti-Wrinkle Moisturizing Treatment - Day SPF 15

RoC® RETINOL ACTIF PUR® Anti-Wrinkle Moisturizing Treatment - Day SPF 15 is clinically proven to visibly reduce fine lines and wrinkles in 12 weeks. Enriched with Vitamin E and SPF 15 UVA/UVB sunscreens, it also helps prevent signs of premature aging.

TIP If you've never used a Retinol product before, be sure to read our [Ingredients and Usage Tips](#).



"Best of Beauty"
Editor's Pick for best
anti-aging treatment

- September 2003

[INGREDIENTS & USAGE TIPS](#)

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RoC
CHALLENGE

Give us 12 weeks.
Get back 10 years.*

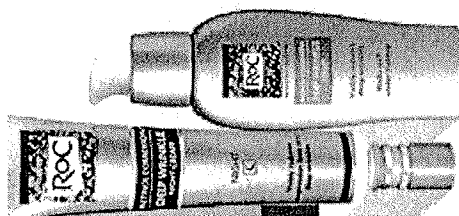


RoC
CHALLENGE

Give us 12 weeks,
Get back 10 years.*

Clinically Proven Results

After just 12 weeks of use in testing, clinical participants enjoyed diminished appearance of wrinkles. Results may vary.



Register for 12 weeks of personalized tips and support, use RoC® RETINOL CORREXION® products, and watch the crow's feet and laugh lines diminish before your eyes.

Register now >

Returning Users Log In

Username:

Password:

Forgot Password?

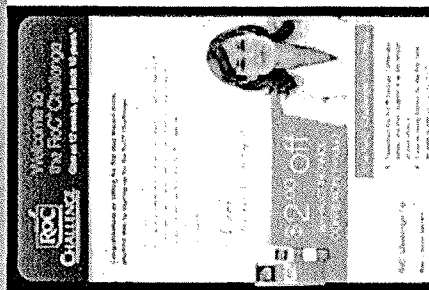
*On average, skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETINOL CORREXION® Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

Exclusive RoC® Challenge Benefits

- Savings certificates
- Personalized tips newsletters
- Tips from the RoC® Challenge Beauty Expert
- Member-only RoC® Challenge Resource
- RoC® Challenge Sweepstakes
- Exciting Grand Prize Give-Away

Ready to get started?

Register now



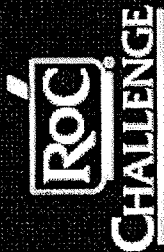
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RoC® Challenge
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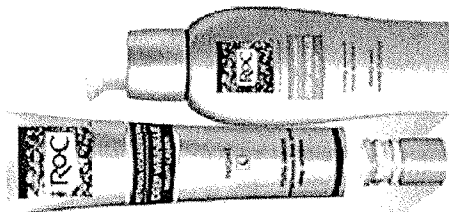
RoC® Challenge Registration

When you look 10 years younger, you're proud to celebrate your age.

Let us prove it to you. Just register for the RoC® Challenge, receive bi-weekly e-mails and find out how 12 weeks can make a difference – enroll now!

Registration allows you to enjoy the many free benefits we offer, such as news, special offers and promotions from RoC® and Johnson & Johnson Consumer Products Company and helps us communicate with you better and permits you to participate in interest communities and the message board. You will select a User ID and password when you register with this site. You may check, update or correct registration information you enter here by using your User ID and password to access such information. Using this site as a registered user enables information that is passively collected while you navigate the site to be associated with personally identifiable information actively collected from you via the site. By completing the required information to submit registration information, you consent to the combinations of anonymous and personally identifiable information whenever you use the site as a registered visitor and agree that the information you provide will be governed by our site's Privacy Policy.

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On average, skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® Retinol CORREX AN® Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

* First Name: _____

* Last Name: _____

* E-mail: _____

* Re-enter E-mail: _____

* Address: _____

Address 2: _____

* City: _____

* State:

* ZIP Code: _____

Gender: ☐ Female ☐ Male

* Birthday: Month Day Year

* How did you hear about the RoC® Challenge?:

* Are you currently a RoC® user?: ☐ Yes ☐ No

* Username: _____

* Password: _____

* Confirm Password: _____

* I accept to the RoC® Challenge Terms & Conditions

Our average skin appeared 10 years younger after 12 weeks of use in clinical studies. Results may vary.

After 12 weeks of use in clinical studies, we observed appearance of wrinkles after 12 weeks of use in clinical studies. Results may vary.

After 12 weeks of use in clinical studies, we observed appearance of wrinkles after 12 weeks of use in clinical studies. Results may vary.

After 12 weeks of use in clinical studies, we observed appearance of wrinkles after 12 weeks of use in clinical studies. Results may vary.

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* Required Field

* Username:

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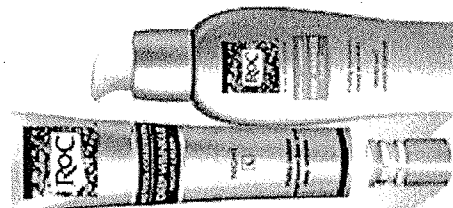
[CANCEL](#)

Did you forget both your username and password? You can

create a new profile.

Do you need to the form?

reset



*On average, skin appeared 10 years younger based on line analysis appearance of wrinkles after 12 weeks of use in clinical testing of either RoC Retinol CORREXION Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

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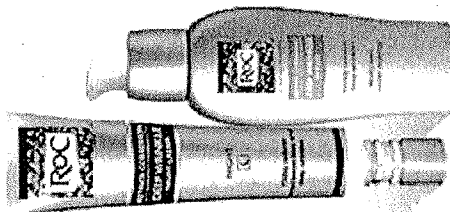
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*On average, skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETINOL CORREX ON,® Deep Wrinkle Night Cream, or Deep Wrinkle Serum. Results may vary.

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199 Grandview Road
Skillman, NJ 08558-9418
1-800-762-1964

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Contact Us

On average, our patients 10 years younger based on the combined appearance of wrinkles after 12 weeks of use in clinical testing of our RoC® Retinol CORREXION® Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

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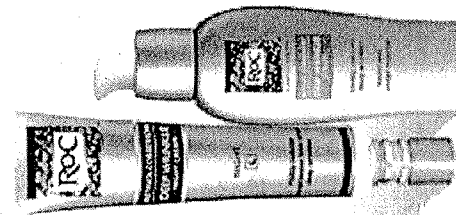


RoC® Challenge

Give us 12 weeks, get back 10 years.*

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*On average, skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETINOL CREAM or RoC® RETINOL NIGHT CREAM or RoC® DEEP WRINKLE SERUM. Results may vary.

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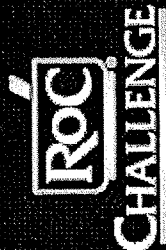
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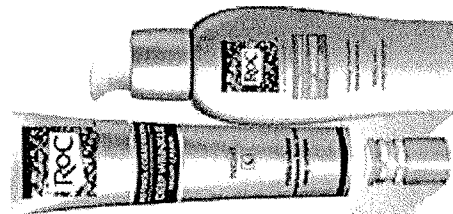
Give us 12 weeks, get back 10 years.*

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*On average, skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETINOL CORREXION® Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

Tell a friend about the RoC@ Challenge

* Required Field

Your name:*

Your e-mail address:*

Friend's e-mail address: *
Separate multiple addresses with commas (,)

SUBMIT

CANCEL

Please note that by submitting an e-mail address, you are requesting that we contact the person you specify here on your behalf. Your contact information and your friend's contact information are required, but will not be used other than to distribute the communication you request.

On average, this occurred 10 years ago, based on the number of appearances of wrinkles after 12 weeks of use in clinical testing of either RoC® Retinol Cream or Deep Wrinkle Serum. Results may vary.

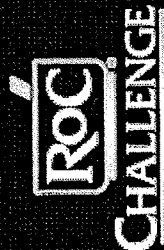
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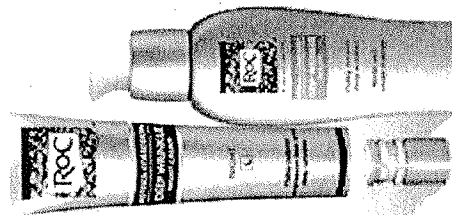
RoC® Challenge Registration

When you look 10 years younger, you're proud to celebrate your age.

Let us prove it to you. Just register for the RoC® Challenge, receive bi-weekly e-mails and find out how 12 weeks can make a difference – enroll now!

Registration allows you to enjoy the many free benefits we offer, such as news, special offers and promotions from RoC® and Johnson & Johnson Consumer Products Company and helps us communicate with you better and permits you to participate in interest communities and the message board. You will select a User ID and password when you register with this site. You may check, update or correct registration information you enter here by using your User ID and password to access such information. Using this site as a registered user enables information that is passively collected while you navigate the site to be associated with personally identifiable information actively collected from you via the site. By completing the required information to submit registration information, you consent to the combinations of anonymous and personally identifiable information whenever you use the site as a registered visitor and agree that the information you provide will be governed by our site's Privacy Policy.

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100% stronger skin appeared 10 years younger based on the diminished appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETINOL CREAM or RoC® DEEP WRINKLE NIGHT CREAM. Deep Wrinkle Serum. Results may vary.

* Confirm Password:

* I accept to the RoC® Challenge Terms & Conditions

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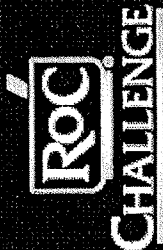
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CHALLENGE

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Get back 10 years.*



Roc® Challenge

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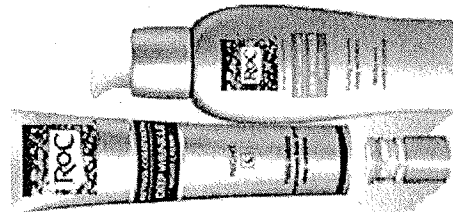
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*120 average skin appeared 10 years younger based on the wrinkles appeared on the face after 12 weeks of use in clinical testing of either Roc® Retinol CORREXION® Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

Tell a friend about the RoC® Challenge

* Required Field

Your name:*

Your e-mail address:*

Friend's e-mail address: * Separate multiple addresses with commas (,)

SUBMIT

CANCEL

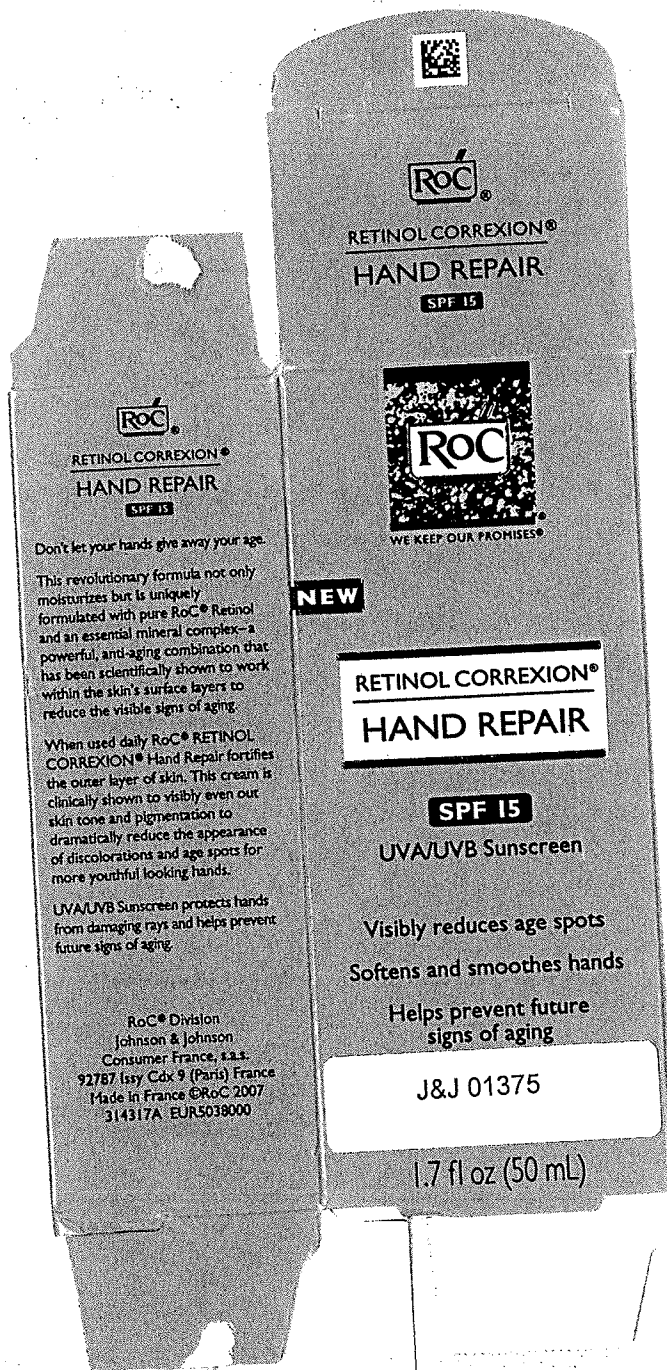
*On average, skin appeared 10 years younger based on the combined appearance of wrinkles after 12 weeks of use in clinical testing of either RoC® RETinol CORREX™ or Deep Wrinkle Night Cream or Deep Wrinkle Serum. Results may vary.

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RETINOL CORREXION®
HAND REPAIR
SPF 15

Don't let your hands give away your age.

This revolutionary formula not only moisturizes but is uniquely formulated with pure RoC® Retinol and an essential mineral complex—a powerful, anti-aging combination that has been scientifically shown to work within the skin's surface layers to reduce the visible signs of aging.

When used daily RoC® RETINOL CORREXION® Hand Repair fortifies the outer layer of skin. This cream is clinically shown to visibly even out skin tone and pigmentation to dramatically reduce the appearance of discolorations and age spots for more youthful looking hands.

UVA/UVB Sunscreen protects hands from damaging rays and helps prevent future signs of aging.

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RETINOL CORREXION®
HAND REPAIR
SPF 15



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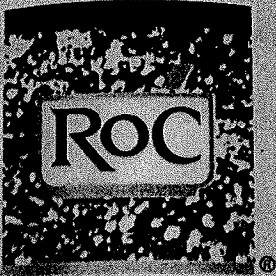
RETINOL CORREXION®
HAND REPAIR

SPF 15
UVA/UVB Sunscreen

Visibly reduces age spots
Softens and smoothes hands
Helps prevent future
signs of aging

J&J 01375

1.7 fl oz (50 mL)



WE KEEP OUR PROMISES®

AGE DIMINISHING®
FACIAL CLEANSER

Gently cleanses to bring back
luminous, youthful skin

Revitalizes skin tone

with
Conditioning Soy Extracts

5.07 fl oz (150 ml)

DEODORANTE ROLL-ON
Efficace per 24 ore,
Senza profumo - Senza alcool

Azione: Keops di RoC assicura efficacia per 24 ore, senza profumo.
Innovazione: I "regolatori attivi" riducono l'eccessiva traspirazione permettendo alla pelle di respirare naturalmente, ed il complesso "cattura odori" elimina gli odori dovuti alla traspirazione. Risultato: Keops mantiene la tua pelle fresca per 24 ore.
Sicurezza: senza profumo e senza alcool, questo deodorante roll-on non irrita la pelle. Fresco al momento dell'applicazione, può essere utilizzato anche dopo la depilazione.

FORMULATO PER MINIMIZZARE I RISCHI DI ALLERGIA

DEODORANT ROLLER

Doeltreffend 24 uur lang,
Zonder Parfum - Zonder Alcohol

Werking: Keops van RoC zorgt voor een doeltreffendheid 24 uur lang, zonder parfum.
Innovatie: actieve regulatoren gaan overmatige transpiratie tegen en laten de huid op een natuurlijke wijze ademen, terwijl geurabsorberende stoffen alle transpiratiegeurtjes doen verdwijnen. Resultaat: Keops houdt de huid fris gedurende 24 uur.
Veiligheid: deze deodorant-roller is ongeparfumeerd, bevat geen alcohol en irriteert de huid niet. Fris bij het aanbrengen. Kan ook na het ontharen gebruikt worden.

ZODANIG SAMENGESTELD DAT DE KANS OP ALLERGIE MINIMAAL IS



Action: Keops de RoC apporte une efficacité 24 heures, sans parfum.
Innovation: des actifs régulateurs réduisent la transpiration excessive tout en laissant votre peau respirer naturellement et des capteurs d'odeurs éliminent les odeurs liées à la transpiration. Résultat: Keops laisse votre peau fraîche durant 24 heures.
Sécurité: sans parfum et sans alcool, ce déodorant bille n'irrite pas la peau. Frais à l'application, il peut être utilisé même après épilation.

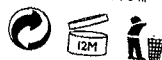
FORMULE POUR MINIMISER LES RISQUES D'ALLERGIES

Action: Keops from RoC provides 24 hours effectiveness, without fragrance.
Innovation: regulating active agents reduce excessive perspiration while allowing your skin to breathe naturally. Odour Capture Complex eliminates body odours. Result: Keops keeps your skin fresh for 24 hours.
Safety: perfume and alcohol free, this roll-on deodorant won't irritate your skin. It feels fresh when applied and can even be used after hair removal.

FORMULATED TO MINIMISE THE RISK OF ALLERGIES

Ingredients: Aqua, Aluminium Chlorohydrate, Propylene Glycol, Ceteth-20, Phenoxethanol, Hydroxyethylcellulose, Aldous, Citronellyl Methylcrotonate, Methylparaben, Propylparaben.

RoC Division
Johnson & Johnson Consumer France s.r.l.
22107, rue de la République - Grasse
Made in France - EUR 935002
ACQ 1193703 - CN 248571
CNK 1219377 - ANP 640711
Vendu exclusivement par
les distributeurs agréés RoC
www.rocc.com



07/07

4

ROLL-ON DEODORANT
24-Stunden-Langzeitwirkung,
Ohne Parfum - Ohne Alkohol

Wirkung: Keops von RoC wirkt effektiv 24 Stunden lang, unparfümiert.
Innovation: regulierende Aktivstoffe reduzieren übermäßige Transpiration und lassen dabei Ihre Haut natürlich atmen, während Geruchsfänger Transpirationsgeruch verhindern. Das Ergebnis: Keops erfrischt Ihre Haut 24 Stunden lang.
Sicherheit: der Roll-on enthält weder Parfum noch Alkohol und reizt die Haut nicht. Er verleiht beim Auftragen ein Gefühl von Frische und kann auch nach der Epilation angewendet werden.

ALLERGIE-RISIKEN WURDEN AUF EIN MINIMUM REDUZIERT

DESODORANTE ROLL-ON
Efficace 24h,
Sin perfume - Sin alcohol

Acción: Keops de RoC, proporciona una eficacia durante 24 horas, sin perfume.
Innovación: principios activos reguladores reducen la sudoración excesiva, a la vez que dejan a la piel transpirar de forma natural, y captadores de sustancias volátiles eliminan los malos olores relacionados con la transpiración. Resultado: Keops mantiene tu piel fresca durante 24 horas.
Seguridad: este desodorante de bola, sin perfume ni alcohol, no irrita la piel. Fresco al aplicarlo, puede utilizarse incluso después de la depilación.

FORMULADO PARA MINIMIZAR LOS RIESGOS DE ALERGIAS



KEOPS®

DEODORANT A BILLE
ROLL-ON DEODORANT



PROMESSES TENUES®
WE KEEP OUR PROMISES®



KEOPS®

DEODORANT A BILLE
ROLL-ON DEODORANT



Efficacité 24h
Sans Parfum - Sans Alcool

Effective for 24 hours
Fragrance Free - Alcohol Free

J&J 01568

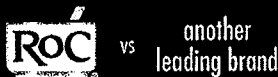
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31501/R

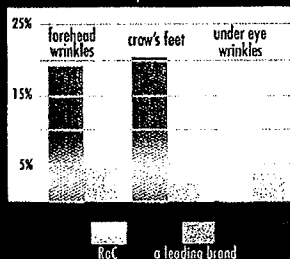


WE KEEP OUR PROMISES®

In a clinical study, RoC® RETINOL CORREXION® Night Cream was significantly more effective than an anti-aging treatment from another leading brand in diminishing signs of aging.



% improvement



forehead wrinkles **4x** more effective
crow's feet **7x** more effective
under eye wrinkles **4x** more effective

learn more about our clinical results at retinokc.com

C. Bruckner, S. Thurber Jones, K. Koehler,
S. Cartland, K. Johnson, A. Wells

DDB CHICAGO INC.
JJCRO84209-3RD P84209

"We Keep Our Promises"

Johnson & Johnson/RoC Retinol Correxion – Deep Wrinkle Night Cream
1/3 Page, B: 3.25 in x 11.125 in, T: 2.5 in x 10.5 in, S: 2 in x 9.5 in, 4/C

Publications: Various publications
Pre-Press: DDB Chicago

the Studio

Client
Johnson & Johnson/RoC Retinol Correxion

File Name
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Folder
PB4209_JJCRO_RoC_Promises

Printout @ 100%

Q5 X.4; InDesign CS3

PO# 10698 WD# 84209.1

Keyline Size

B: 3.25 in x 11.125 in
T: 2.5 in x 10.5 in
L: 2 in x 9.5 in

Digital Artist
A. Wells

Date
3-13-2008 4:56 PM

Revision #4

Lead
J. Fogle

Routing Signatures

Creative Director:

Art Director:

Copywriter:

Acct. Exec.:

Print Producer:

Print Project Mgr.:

OK to Release

Client:

Acct. Service:

Notes

None

Colors

■ Cyan, ■ Magenta,
Yellow, ■ Black

Slug Font: Myriad Pro

Fonts
Futura (Medium Condensed;
Type 1)

Links

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psd (CMYK; 219 ppl, 149
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ppl, 107 ppl, 508 ppl, 474
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ppl)

J&J 01581

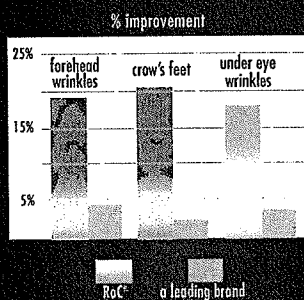


WE KEEP OUR PROMISES®

In a clinical study, RoC® RETINOL
CORREXION® Night Cream was significantly
more effective than an anti-aging
treatment from another leading brand
in diminishing signs of aging.



vs another
leading brand



forehead wrinkles **4x** more effective

crow's feet **7x** more effective

under eye wrinkles **4x** more effective

learn more about our clinical results at rocskincare.com

C. Bruckner, S. Thurber Jones, K. Koehler,
S. Cartland, K. Johnson, A. Wells
DDB CHICAGO INC.

JJCRO84209-3RD P84209

"We Keep Our Promises"

Johnson & Johnson/RoC Retinol Correxion – Deep Wrinkle Night Cream
1/3 Page, B: 3.25 in x 11.125 in, T: 2.5 in x 10.5 in, S: 2 in x 9.5 in, 4/C

Publications: Various publications
Pre-Press: DDB Chicago

the Studio

Client

Johnson & Johnson/RoC Retinol
Correxion

File Name

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Folder

P84209_JJCRO_RoC_Promises

Printout @ 100%

OS X.4: InDesign CS3

PO# 10698 WO# 84209.1

Keyline Size

B 3.25 in x 11.125 in

T 2.5 in x 10.5 in

L 2 in x 9.5 in

Digital Artist

A. Wells

Date

3-13-2008 4:56 PM

Revision # 4

Lead

J. Fogle

Routing Signatures

Creative Director:

Art Director:

Copywriter:

Acct. Exec.:

Print Producer:

Print Project Mgr.:

OK to Release

Client:

Acct. Service:

Notes

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Yellow, Black

Slug Font: Myriad Pro

Fonts

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Type 1)

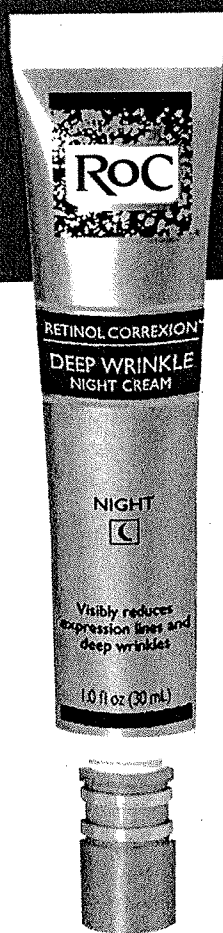
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ppi, 1077 ppi, 109 ppi, 406
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ppi)

J&J 01581

THE PROMISE

10
YEARS BACK*



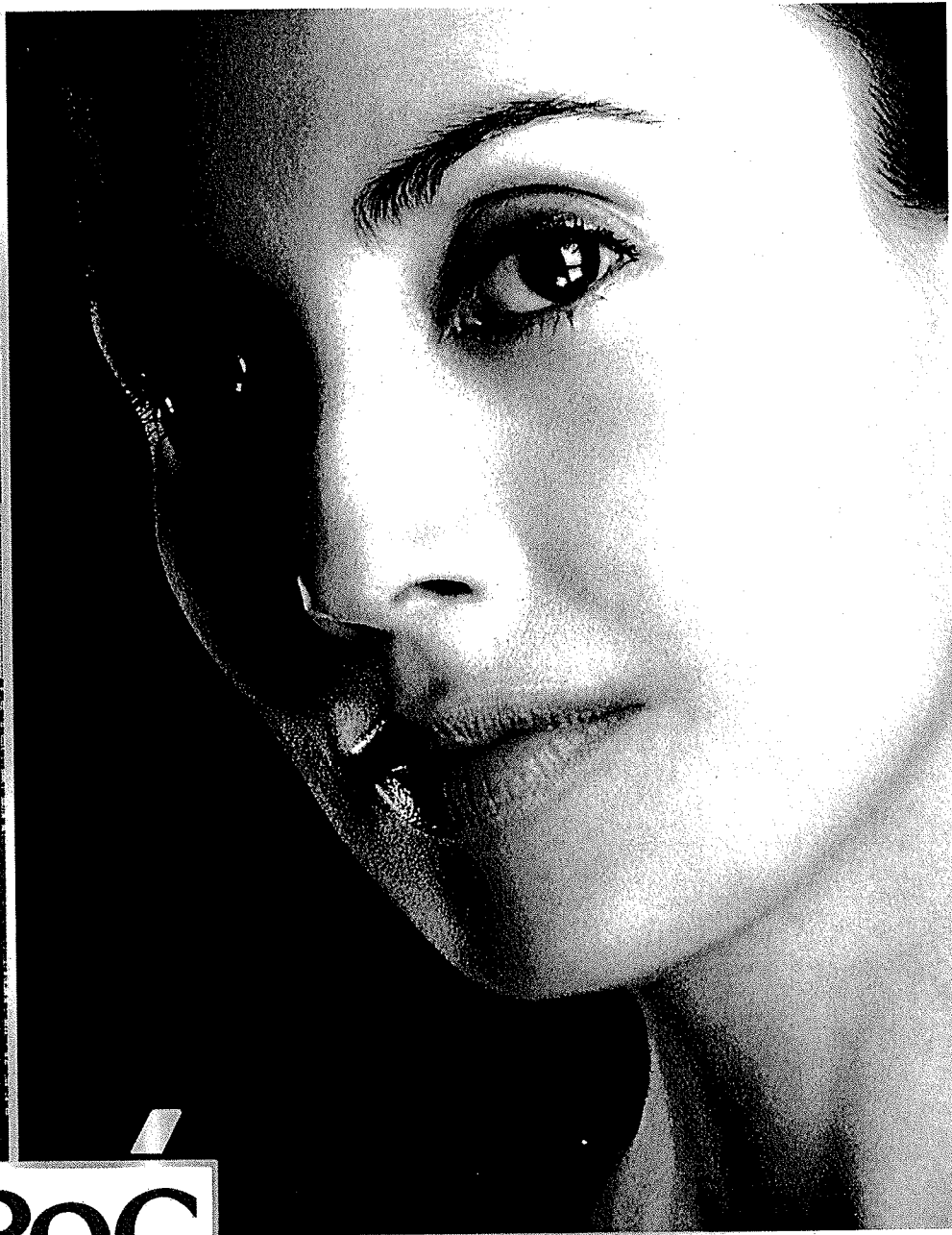
*on average, 10 years back to the look of your skin based on diminished appearance of wrinkles after 12 weeks use in clinical testing

RoC

Contains RoC® RETINOL, an exclusive complex of pure retinol plus essential minerals, which stimulates cell renewal to help skin rebuild its own collagen.

RoC® WE KEEP OUR PROMISES®

available at a drugstore near you



THE PROOF

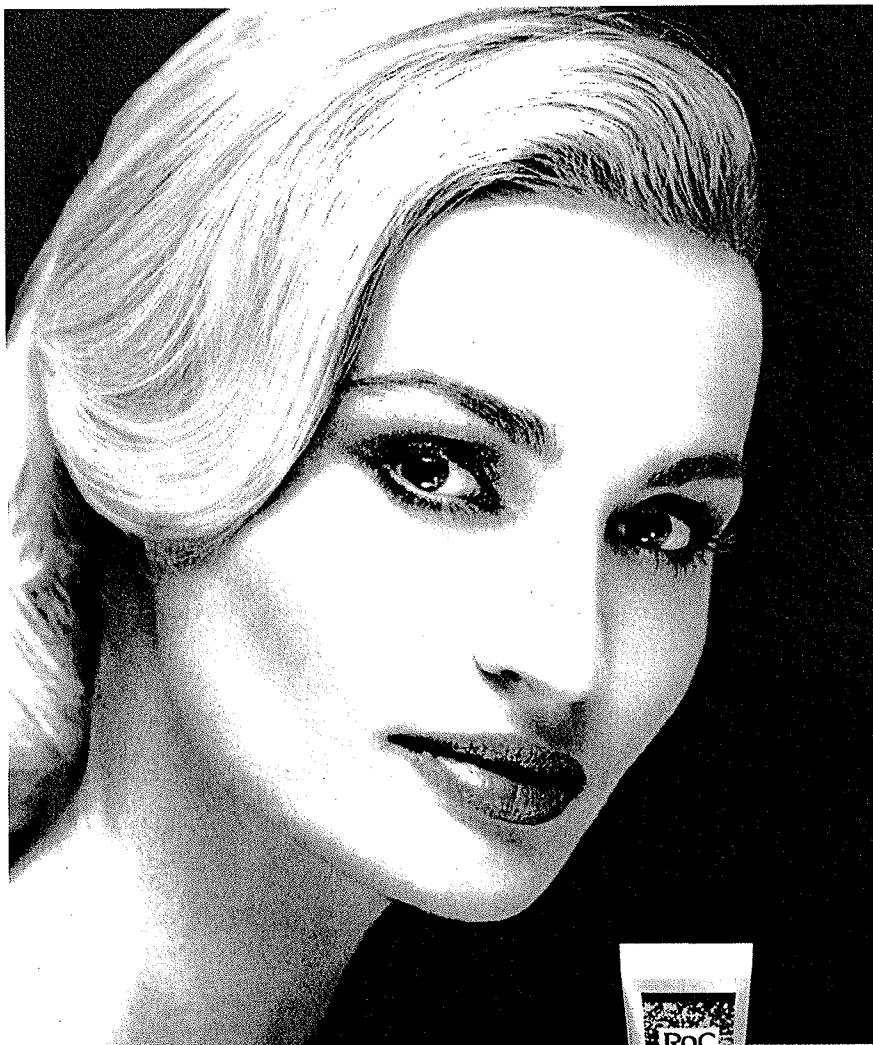


before

after 12 weeks*

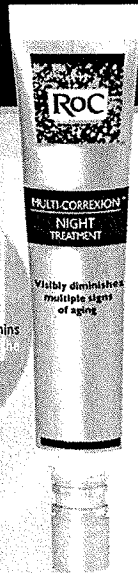
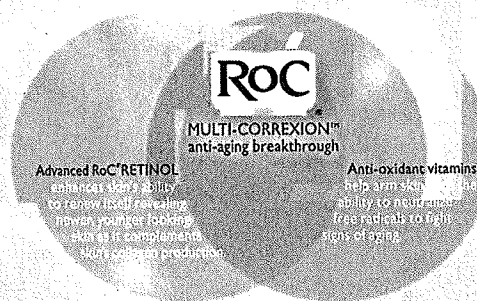
see our clinical results at rocskincare.com

J&J 01582



THE PROMISE

all
exclusive fusion



THE PROOF

In an independent clinical study:

94% of women saw a diminished look of **WRINKLES**.

79% of women experienced improved **ELASTICITY**
for more defined facial contours.

96% of women experienced **BRIGHTER** more radiant skin.

85% of women saw a diminished look of **DARK CIRCLES**
for greater clarity in the eye area.

WE KEEP OUR PROMISES®

J. Webber, S. Thurber Jones, K. Koehler,
K. Blatchford, K. Johnson, J. Fogle, S. Roseberry
DDB CHICAGO INC.

JJCRO84249-R1 P84249

"The Promise"

Johnson & Johnson/RoC – Multi-Correxion Night Treatment
Page, B: 9.25 in x 11.125 in, T: 7.75 in x 10.5 in, S: 7 in x 10 in, 4CB

Publications: various publications
Pre-Press: DDB Studio

the Studio

Client
Johnson & Johnson/RoC

File Name
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Folder
P84249_JJCRO_RoC_MultiCorr

Printout @ 100%

OS X, 4: InDesign CS3

PO# 11714 WO# P84249.3

Keyline Size
B 9.25 in x 11.125 in
T 7.75 in x 10.5 in
L 7 in x 10 in

Digital Artist
S. Roseberry

Date
7-2-2008 1:28 PM

Revision # 0

Lead
J. Fogle

Routing Signatures

Creative Director:

Art Director:

Copywriter:

Acct. Exec.:

Print Producer:

Print Project Mgr.:

OK to Release

Client:

Acct. Service:

Notes

None

Colors

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Yellow, Black

Slug Font: Myriad Pro

Fonts

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Type 1), Gill Sans (Regular,
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J&J 01583

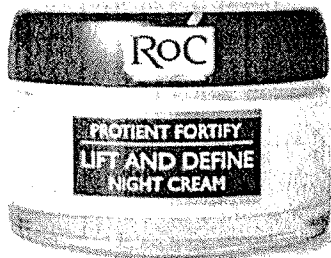
THE PROMISE

VISIBLY
LIFTS,
FIRMS &
DEFINES

RoC

CLINICALLY SHOWN

Patented PROTIENT™ technology firms
and tightens skin while you sleep.



RoC®. WE KEEP OUR PROMISES®



available at a drugstore near you
learn more about our science at rocskinare.com

THE PROOF

- immediately skin elasticity is improved
- after 4 weeks skin is firmer
- after 8 weeks facial features are lifted and facial contours are more defined

C. Bruckner, S. Thurber Jones, K. Koehler, S. Cartland,
K. Johnson, S. Jablonoski

DDB CHICAGO INC.
JJCAV84211 P84211

"Visibly lifts..."

Johnson & Johnson/RoC - Protient Fortify Lift and Define
Night

Page, B: 9.25 in x 11.125 in, T: 7.75 in x 10.5 in, S: 6.75 in x 9.5
in, 4/C

Publications:
Pre-Press: DSG

the Studio

Client
Johnson & Johnson/RoC

File Name
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Folder
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PlatinumAds

Printout @ 100%

OS X.4: InDesign CS3

PO# 10847 WO# 2

Keyline Size
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Digital Artist
S. Jablonoski

Date
3-5-2008 2:39 PM

Revision # 1

Lead
J. Fogle

Routing Signatures

Creative Director:

Art Director:

Copywriter:

Acct. Exec.:

Print Producer:

Print Project Mgr.:

OK to Release

Client:

Acct. Service:

Notes
None

Colors

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Black

Slug Font: Myriad Pro

Fonts
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J&J 01584



ROC

PROMESSES TENUES*
WE KEEP OUR PROMISES*

MINESOL[®]
PROTECT

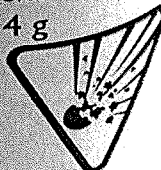
FPS • SPF

30

**APPLICATION
EXPRESS**

ATOMISEUR MULTIPPOSITIONS
MULTI-POSITION ATOMIZER

114 g



DANGER

EXTREMELY FLAMMABLE. EXTREMEMENT INFLAMMABLE.
CONTAINER MAY EXPLODE. LE CONTENANT PEUT EXPLODIER
SI CHAUFFÉ. S'IL EST CHAUFFÉ.

MINESOL® PROTECT FPS 30
ATOMISUR HAUTE PROTECTION SOLAIRE
Mélange à l'eau et à la sueur, invisible, non gras

Minesol® a été développé en collaboration avec des dermatologues. L'Atomiseur PROTECT assure une protection solaire spécialisée dans un format pratique. Cette combinaison vaporise une brume invisible pour offrir une protection efficace à ces mêmes endroits difficiles à atteindre. Sa combinaison de filtres UV est scientifiquement éprouvée pour fournir une protection à large spectre contre les rayons UVA/UVB.

Ne peut pas causer des brûlures, le vieillissement prématuré de la peau ou le cancer de la peau. Le port de vêtements protecteurs et l'évitement du soleil peuvent réduire le risque de ces effets nocifs.

UTILISATION: Appliquer généreusement avant l'exposition au soleil et avant de se baigner. Pas besoin de frotter. Rappliquer après la baignade ou la douche. Sécher avec une serviette et après avoir transpiré abondamment. Pour utilisation sur les mains, porter dans les mains et appliquer, en évitant tout contact avec les yeux.

PRÉCAUTIONS: Pour usage externe seulement. Éviter tout contact avec les yeux. Rincer abondamment les yeux à grande eau. Cesser l'emploi si une irritation de la peau apparaît. Si l'irritation persiste, consulter un professionnel de la santé. Tenir hors de portée des enfants. Consulter un professionnel de la santé avant d'utiliser sur les enfants de moins de 6 mois.

CONTENU SOUS PRESSION: Ne pas mettre dans l'eau chaude ou sur une cuisinière ou de toute autre source de chaleur. Ne pas percer. Garder à l'abri du feu, ni le conserver à une température de plus de 50 °C. NE PAS UTILISER EN PRÉSENCE D'UNE FLAMME NUE OU D'ÉTINCELLES.

MINESOL® PROTECT SPF 30
HIGH PROTECTION, SUNCARE ATOMIZER
Water resistant, sweatproof, transparent, non-greasy

Developed with dermatologists, MINESOL® PROTECT atomizer provides sun care protection in an easy to use format. This multi-position atomizer is designed not to ensure effective sun protection, even in the hardest to reach areas. The combination of sun UV filters is scientifically proven to offer broad-spectrum UV protection.

It can't cause sunburn, premature aging of the skin and skin cancer. Wearing protective clothing and regular use of sunscreens over the years reduce the chance of these harmful effects.

Directions: Apply generously prior to sun exposure and use in an open area. No need to rub. After swimming, towel drying, perspiring heavily or washing. For use on the hands and apply, avoiding contact with eyes.

Warnings: For external use only. Avoid contact with eyes. If contact occurs, rinse with water. Discontinue use if skin irritation develops or increases. If irritation persists, consult a health care practitioner. Keep out of reach of children. Consult a health care practitioner prior to use on children less than six months of age.

CONTENTS UNDER PRESSURE: Do not place in hot water or near other sources of heat. Do not puncture or incinerate container or contents. **DO NOT USE IN PRESENCE OF OPEN FLAME OR SPARK.**

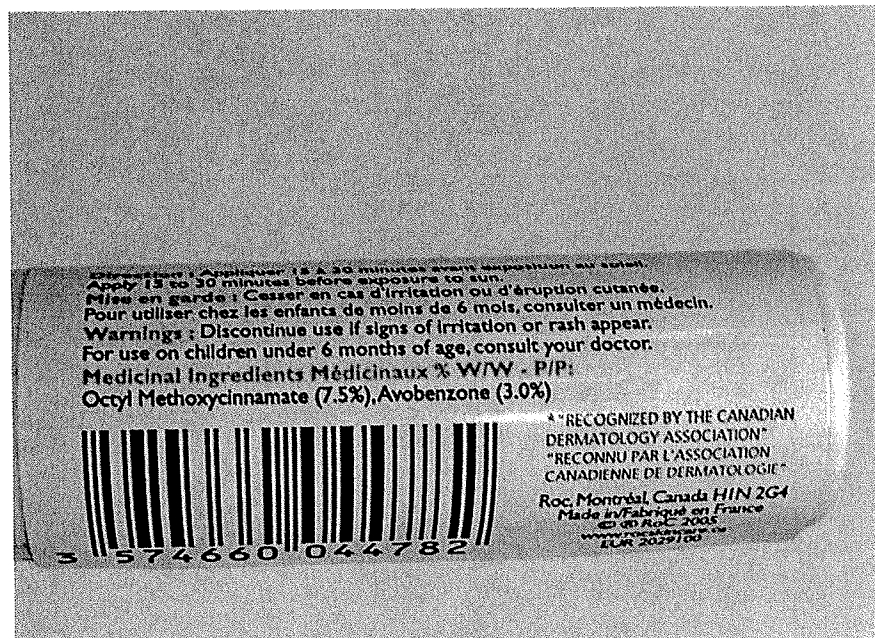
INGREDIENTS MÉDICINAUX % W/W-P/P: Homosalate (8%), Octocrylene (4%), Avobenzone (3%), Octocrylene (2.35%).

INGREDIENTS NON MÉDICINAUX: Water, Ethanol, Copolymer, Acrylates/Octylacrylamide, Dimethylsiloxane, Acetyl Palmitate, Cyclopentasiloxane, Dimethicone, Isobutane, Parfum, Tocopheryl Palmitate, Tocopheryl Acetate.



Reconnu par
l'Association
canadienne de
dermatologie







PROMESSES TENUES®
WE KEEP OUR PROMISES®

HYDRA+ BIO ACTIVE

SOIN BIO-HYDRATANT
NOURRISSANT CORPS

BIO-MOISTURISING
NOURISHING BODY LOTION

POUX SECHES ET TRES SECHES
DRY AND VERY DRY SKIN

TRATTAMENTO IDRATANTE**
NUTRIENTE CORPO

Pelle secca e molto secca

CREMA CORPORAL
BIOHIDRATANTE Y NUTRITIVA

Pieles secas y muy secas

FEUCHTIGKEITSPFLEGE
MIT AUFBAUSTOFFEN

Trockene und sehr trockene Haut

BIO-HYDRATERENDE
VOEDENDE LICHAAMSVERZORGING

Voor de droge tot zeer droge huid

TRATTAMENTO BIO-HIDRATANTE***
NUTRITIVO PARA O CORPO

Pele seca e muito seca

ΟΡΕΠΤΙΚΗ ΠΕΡΙΠΟΙΗΣΗ
ΜΕ ΑΝΤΙΟΞΕΙΔΩΤΙΚΑ
ΣΥΣΤΑΤΙΚΑ ΓΙΑ ΤΟ ΣΩΜΑ

Προϊόν για πολύ ξηρή επιδερμίδα

Hydratation des couches supérieures de l'épiderme
Nutrizione degli strati superiori dell'epidermide
Hidratação das camadas superiores da epiderme

Roc Division

Johnson & Johnson Consumer France S.A.S.
17, rue de Valenciennes, 92 (Paris) - France

Made in France

CH-6300 Zug

100 mg Markham, Canada L3R 5L2

www.roc.com



e 200ml





OPPOSERS' EXHIBIT G

Consolidated Opp. No. 91/182,207 (parent)

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

JOHNSON & JOHNSON and
ROC INTERNATIONAL S.A.R.L.,

Opposer,

v.

OBSHESTVO OGRANITCHENNOY;
OTVETSTVENN OSTIU "WDS"

Applicant.

Opposition Nos. 91/182,207 (parent)
91/184,467

**OPPOSER'S SUPPLEMENTAL RESPONSES AND OBJECTIONS
TO APPLICANT'S FIRST SET OF REQUESTS FOR ADMISSIONS**

Opposers Johnson & Johnson and ROC International S.A.R.L. ("Opposers"), by their attorneys, supplement their initial responses to Applicant, WDS ("Applicant's") First Set of Requests for Admissions as follows.

Opposers hereby incorporate by reference all General Objections set forth in their Answers and Objections to Applicant's First Set of Interrogatories, replacing the word "Interrogatory(ies)" with "Requests for Admission(s)" where necessary. Opposers object to these Requests for Admissions to the extent that they purport to request any information that is not relevant to these proceedings and /or that Opposers are not obliged to proffer under the Federal Rules of Civil Procedure or the Trademark Rules of Practice.

REQUESTS FOR ADMISSION

1. Admit that Opposers have conducted a thorough search for documents and information responsive to Applicant's First Set of Interrogatories to Opposer, attached as Exhibit A.

36. Admit that Opposers do not currently offer "eye make-up" in connection with Opposers' ROC marks in the United States.

RESPONSE:

Opposers object to this request on the basis of relevance, and on the basis that it is vague and ambiguous as to the intended meaning of "eye make up" in the context of this request.

Subject to and without waiving this objection, denied.

37. Admit that Opposers do not currently offer "liquid foundation" in connection with Opposers' ROC marks in the United States.

RESPONSE:

Opposers object to this request on the basis of relevance, and on the basis that it is vague and ambiguous as to the intended meaning of "liquid foundation" in the context of this request.

Subject to and without waiving this objection, admitted.

38. Admit that Opposers do not currently offer "skin powder" in connection with Opposers' ROC marks in the United States.

RESPONSE:

Opposers object to this request on the basis of relevance, and on the basis that it is vague and ambiguous as to the intended meaning of "skin powder" in the context of this request.

Subject to and without waiving this objection, admitted.

39. Admit that Opposers do not currently offer "rouge" in connection with Opposers' ROC marks in the United States.

RESPONSE:

Opposers object to this request on the basis of relevance, and insofar as it is vague or ambiguous with respect to the meaning of "rouge" in the context of this request. Subject to and without waiving this objection, admitted.

40. Admit that Opposers do not currently offer "facial soap" in connection with Opposers' ROC marks in the United States.

RESPONSE:

Opposers object to this request on the basis of relevance, and on the basis that it is vague and ambiguous as to the intended meaning of "facial soap" in the context of this request. Subject to and without waiving this objection, denied.

41. Admit that Opposers do not currently offer "skin powder" in connection with Opposers' ROC marks in the United States.

RESPONSE:

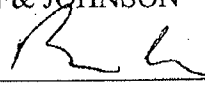
Opposers object to this request on the basis of relevance, and on the basis that it is vague and ambiguous as to the intended meaning of "skin powder" in the context of this request. Subject to and without waiving this objection, admitted.

42. Admit that Opposers do not currently offer "hand cream" in connection with Opposers' ROC marks in the United States.

Respectfully submitted,

JOHNSON & JOHNSON

By:



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District of Columbia Bar application pending;

practice supervised by D.C. Bar members pursuant to

D.C. Bar Rule 49(c)(8).

CERTIFICATE OF SERVICE

This is to certify that this 10th day of December 2010, a true copy of the foregoing

Opposers' Supplemental Responses to Applicants' First Set of Requests for Admission was served, via electronic mail, on:

Erik M. Pelton
PO Box 100637
Arlington, Virginia 22210