UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

BASIC RESEARCH, L.L.C.,
A.G. WATERHOUSE, L.L.C., KLEIN-BECKER USA, L.L.C., NUTRASPORT, L.L.C.,
SOVAGE DERMALOGIC
LABORATORIES, L.L.C.,
BAN, L.L.C.,
DENNIS GAY,
DANIEL B. MOWREY, and MITCHELL K. FRIEDLANDER,

Respondents.

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GENERAL RESPONSES

1. Complaint Counsel's responses are made subject to all objections as to competence,
relevance, privilege, materiality, propriety, admissibility, and any and all other objections and grounds that would require the exclusion of any statement contained herein if any requests were asked of, or if any statements contained herein were made by, or if any documents referenced here were offered by a witness present and testifying in court, all of which objections are reserved and may be interposed at the time of the hearing.

2. The fact that Complaint Counsel have responded to any request for adrmssion in whole or
in part is not intended and shall not be construed as a waiver by Complaint Counsel of all or any part of any objection to any request for admission.

3. Complaint Counsel have not completed their investigation in this case, and additional
facts may be discovered that are responsive to Respondent's interrogatories. Complaint Counsel reserve the right to supplement the responses provided herein as appropriate during the course of discovery.

4. As used herein, "Respondents" shall mean all Respondents named in the Complaint.

5. As used herein, "Respondent's requests for adrmssion" shall mean the requests for
admission and all applicable instructions and defimtions as set forth in Basic Research, LLC's First Request For Admissions.

Requests for Admission and Responses

34. Admit that there is no Federal Trade Commission rule that prohbits a Ph.D from
being referred to as a "doctor."

Response: Complaint Counsel objects to this request to the because it does not seek "an adrmssion of the truth of any matters relevant to the pending proceeding." R. 3.32, Admissions.

Certificate of Service

I hereby certify that on the 24th day of November, 2004, I caused