

Boehringer Ingelheim Vetmedica, Inc.

October 28, 2011

R. Michael Herrman

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Director, Senior Division Counsel

Commissioner for Trademarks US Patent and Trademark Office P.O. Box 1451 Alexandria, VA 22313-1451

Dear Sir or Madam:

Trademark Application 85/193912 ACUGUARD of Vicar Operating, Inc.

Boehringer Ingelheim Vetmedica, Inc., owner of Trademark Registration Nos. 2118487 OCU-GUARD MB and 3339193 Ocu-Guard for bovine vaccine, hereby consents to use and registration by Vicar Operating, Inc. of the trademark ACUGUARD for anti flea tablets for cats and dogs, the subject of Trademark Application No. 85/193912.

We are of the view that there is no likelihood of confusion between ACUGUARD for anti flea tablets for cats and dogs and OCU-GUARD MB and Ocu-Guard for bovine vaccine given the differences between the marks and the goods for which they are used.

Respectfully,

Boehringer Ingelheim Vetmedica, Inc.

ItS ASSISTANT SECRETARY