

AFFIDAVIT

STATE OF NEW JERSEY)
)
COUNTY OF MORRIS) ss.

I, William Richard Mordan, being first duly sworn upon oath, depose and state as follows:

1. I am the Area Vice President & General Counsel of Reckitt Benckiser Inc. (“Company”).

2. Company is a leading manufacturer and distributor of a variety of cleaning products, including such household brands as LYSOL®, SPRAY ‘n WASH®, and GLASS PLUS®.

3. Company is a member of The Soap and Detergent Association (“SDA”), a trade association that serves as an advocate for the cleaning product and oleochemical industries.

4. Company chose to join SDA because of SDA’s broad range of research, informational, educational, legislative and promotional activities that are directed to advancing the interests of the cleaning product industry.

5. In addition to Company’s membership in SDA, I serve on the SDA Board of Directors and as Chair of the SDA Legal Committee.

6. In addition to THE SOAP AND DETERGENT ASSOCIATION house mark, SDA uses the trademark THE HOME OF THE U.S. CLEANING PRODUCT AND OLEOCHEMICAL INDUSTRIES (the “SDA Tagline”) as an association identifier and tagline for the services it offers to its members.

7. During my tenure as Company’s representative to SDA, I have witnessed use of the SDA Tagline in a variety of mediums including on SDA’s website, on annual reports distributed to its members, including the Company and others, on press releases, in magazine articles, and on other advertising and promotional materials.

8. I have visited SDA’s www.cleaning101.com website and have seen the SDA Tagline on that website.

9. Further, in my role as Company’s representative to SDA, I have received membership and other reports that prominently feature the SDA Tagline on their covers. I have also further distributed these membership and other reports to employees within the Company because of the relevance of the information in the reports to the activities of the Company.

10. I have viewed numerous press releases issued by SDA, each displaying the SDA Tagline.

11. Further, I am aware that the SDA Tagline has appeared in a variety of articles in trade publications discussing SDA and its services, including Happi magazine, Chemical Market Reporter and Chemical Week magazine.

12. As a result of my exposure to the SDA Tagline, and by virtue of SDA's activities in advertising, using and promoting that mark, I believe that the SDA Tagline has acquired distinctiveness and consider it to exclusively identify SDA and its services.

13. I further declare as required by 37 C.F.R. Section 2.20 that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the federal service mark application or any registration resulting therefrom.

WR Mordan
William Mordan

The foregoing Affidavit was subscribed and sworn to before me this 21st day of MARCH, 2007.

Mary Elizabeth Moltzen
Notary Public

MARY ELIZABETH MOLTZEN
No. 2195910
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 11/26/2011