

BL O/0126/24

TRADE MARKS ACT 1994

**IN THE MATTER OF
TRADE MARK APPLICATION NUMBER 3735150
BY KWAMENA BONNEY-BHANDAL
TO REGISTER THE TRADE MARK:**



IN CLASS 25

AND

**IN THE MATTER OF OPPOSITION THERETO
UNDER NUMBER 432903
BY PAUL MULLEN**

BACKGROUND AND PLEADINGS

1. On 21 December 2021, Kwamena Bonney-Bhandal (“the applicant”) applied to register in the UK the trade mark shown on the cover page of this decision, under number 3735150 (“the contested mark”). The contested mark was published in the Trade Marks Journal for opposition purposes on 28 January 2022 in respect of the following goods:

Class 25 Clothing.

2. On 25 April 2022, Paul Mullen (“the opponent”) filed a notice of opposition, opposing the application in full, under section 5(2)(b) of the Trade Marks Act 1994 (“the Act”). The opponent relies upon its United Kingdom Trade Mark (“UKTM”) number 3409276 in respect of a series of two trade marks, namely:

- i. PARADAIZA
- ii. PARA-DAIZA

Filing date: 25 June 2019

Registration date: 20 September 2019

Goods and services: For the purpose of these proceedings the opponent relies upon all the goods and services for which the marks are registered, namely:

Class 25 Clothing for men, women and children.

Class 35 Retail services connected with the sale of clothing and clothing accessories.

3. In its notice of opposition, the opponent claims that the respective marks are similar and that the respective goods and services are either identical or similar, resulting in a likelihood of confusion between the marks.

4. The applicant filed a defence and counterstatement denying the grounds of opposition.

5. Given the filing date, the opponent's marks are earlier marks, in accordance with section 6 of the Act. However, as they had not been registered for five years or more at the filing date of the application, they are not subject to the proof of use requirements specified within section 6A of the Act. As a consequence, the opponent may rely upon all of the goods for which the earlier marks are registered without having to establish genuine use.

6. Both the opponent and the applicant are unrepresented. Neither party filed evidence. However, it is noted that the opponent filed website pages with their Form TM7 but was informed by the Tribunal in their official letter of 27 April 2023, that these website pages would not be considered as evidence. Accordingly, my decision will make no further reference to the website pages. Both parties were given the option of an oral hearing but neither requested to be heard on this matter, nor did they choose to file written submissions in lieu of a hearing. This decision is taken following a careful review of the papers before me, keeping all submissions in mind.

RELEVANCE OF EU LAW

7. Although the UK has left the EU, section 6(3)(a) of the European Union (Withdrawal) Act 2018 requires tribunals to apply EU-derived national law in accordance with EU law as it stood at the end of the transition period. The provisions of the Act relied upon in these proceedings are derived from an EU Directive. That is why this decision continues to refer to EU trade mark case law.

PRELIMINARY ISSUES

8. The applicant has raised points in its submissions which I intend to address before going any further into the merits of this opposition. This is because, it is necessary to explain why, as a matter of law, these points will have no bearing on the outcome of this opposition.

9. In its counterstatement, the applicant submits the following:

- Goods and services comparison and the target market

“You have formed a company called Daiza Projects Ltd as an umbrella for your products. This bears absolutely no resemblance to my company Paradisa Ltd. Our products are of high quality both in design and material which makes them stand out in the marketplace.”

10. Differences between the goods and services currently provided by the parties, such as the quality of the product and its impact on the market place or a comparison of the names the parties have named their companies, are not relevant to my assessment. Furthermore, since the opponent’s earlier marks are not subject to proof of use, it is entitled to protection in relation to all the goods and services for which the marks are registered. It is the goods and services relied upon by the opponent and the goods applied for by the applicant that I will be comparing later in this decision. The assessment I must make between the goods and services is a notional and objective assessment, rather than a subjective one.

11. Furthermore, marketing strategies, including the targeting of specific consumers, are temporary and may change over time.¹ As such, it is not appropriate to take that factor into account in my assessment. However, I will make an assessment, later in this decision, as to who the average consumer could be for the goods and services at issue.

DECISION

Section 5(2)(b)

12. Section 5(2)(b) and 5A of the Act is as follows:

“5(2) A trade mark shall not be registered if because—

(a)...

¹ *Devinlec Développement Innovation Leclerc SA v OHIM*, Case C-171/06P

(b) it is similar to an earlier trade mark and is to be registered for goods or services identical with or similar to those for which the earlier trade mark is protected,

there exists a likelihood of confusion on the part of the public, which includes the likelihood of association with the earlier trade mark.”

“5A Where grounds for refusal of an application for registration of a trade mark exist in respect of only some of the goods or services in respect of which the trade mark is applied for, the application is to be refused in relation to those goods and services only.”

13. I am guided by the following principles which are gleaned from the decisions of the Court of Justice of the European Union (“CJEU”) in *Sabel BV v Puma AG*, Case C-251/95, *Canon Kabushiki Kaisha v Metro- Goldwyn-Mayer Inc*, Case C-39/97, *Lloyd Schuhfabrik Meyer & Co GmbH v Klijsen Handel B.V.* Case C-342/97, *Marca Mode CV v Adidas AG & Adidas Benelux BV*, Case C-425/98, *Matratzen Concord GmbH v OHIM*, Case C-3/03, *Medion AG v. Thomson Multimedia Sales Germany & Austria GmbH*, Case C-120/04, *Shaker di L. Laudato & C. Sas v OHIM*, Case C-334/05P and *Bimbo SA v OHIM*, Case C-591/12P:

a) the likelihood of confusion must be appreciated globally, taking account of all relevant factors;

b) the matter must be judged through the eyes of the average consumer of the goods or services in question. The average consumer is deemed to be reasonably well informed and reasonably circumspect and observant, but someone who rarely has the chance to make direct comparisons between marks and must instead rely upon the imperfect picture of them they have kept in their mind, and whose attention varies according to the category of goods or services in question;

c) the average consumer normally perceives a mark as a whole and does not proceed to analyse its various details;

d) the visual, aural and conceptual similarities of the marks must normally be assessed by reference to the overall impressions created by the marks bearing in mind their distinctive and dominant components, but it is only when all other components of a complex mark are negligible that it is permissible to make the comparison solely on the basis of the dominant elements;

e) nevertheless, the overall impression conveyed to the public by a composite trade mark may be dominated by one or more of its components;

f) however, it is also possible that in a particular case an element corresponding to an earlier trade mark may retain an independent distinctive role in a composite mark, without necessarily constituting a dominant element of that mark;

g) a lesser degree of similarity between the goods or services may be offset by a greater degree of similarity between the marks and vice versa;

h) there is a greater likelihood of confusion where the earlier mark has a highly distinctive character, either per se or because of the use that has been made of it;

i) mere association, in the strict sense that the later mark brings the earlier mark to mind, is not sufficient;

j) the reputation of a mark does not give grounds for presuming a likelihood of confusion simply because of a likelihood of association in the strict sense; and

k) if the association between the marks creates a risk that the public will wrongly believe that the respective goods or services come from the same or economically-linked undertakings, there is a likelihood of confusion.

Comparison of Goods and Services

14. Section 60A of the Act provides:

“(1) For the purpose of this Act goods and services-

(a) are not to be regarded as being similar to each other on the ground that they appear in the same class under the Nice Classification.

(b) are not to be regarded as being dissimilar from each other on the ground that they appear in different classes under the Nice Classification.

(2) In subsection (1), the “Nice Classification” means the system of classification under the Nice Agreement Concerning the International Classification of Goods and Services for the Purposes of the Registration of Marks of 15 June 1957, which was last amended on 28 September 1975.”

15. The competing goods and services are as follows:

Opponent’s goods and services	Applicant’s goods
Class 25 Clothing for men, women and children. Class 35 Retail services connected with the sale of clothing and clothing accessories.	Class 25 Clothing.

16. In *Gérard Meric v Office for Harmonisation in the Internal Market*, Case T-133/05, the General Court (“GC”) stated that:

“29. In addition, the goods can be considered as identical when the goods designated by the earlier mark are included in a more general category, designated by trade mark application (Case T-388/00 *Institut für Lernsysteme v OHIM – Educational Services* (ELS) [2002] ECR II-4301, paragraph 53) or where the goods designated by the trade mark application are included in a more general category designated by the earlier mark.”

17. The opponent’s Class 25 goods are included within the broad term *clothing* contained in the applicant’s goods and therefore are considered identical in line with the principle set out in *Meric*.

The average consumer and the nature of the purchasing act

18. The average consumer is deemed to be reasonably well informed and reasonably observant and circumspect. For the purpose of assessing the likelihood of confusion, it must be borne in mind that the average consumer's level of attention is likely to vary according to the category of goods or services in question (see *Lloyd Schuhfabrik Meyer*, Case C-342/97).

19. In *Hearst Holdings Inc, Fleischer Studios Inc v A.V.E.L.A. Inc, Poeticgem Limited, The Partnership (Trading) Limited, U Wear Limited, J Fox Limited*, [2014] EWHC 439 (Ch), Birss J. described the average consumer in these terms:

“60. The trade mark questions have to be approached from the point of view of the presumed expectations of the average consumer who is reasonably well informed and reasonably circumspect. The parties were agreed that the relevant person is a legal construct and that the test is to be applied objectively by the court from the point of view of that constructed person. The words “average” denotes that the person is typical. The term “average” does not denote some form of numerical mean, mode or median.”

20. In my view the average consumer is the general public. The goods will be sold in physical retail stores as well as online and through mail order. The act of purchasing

will be a primarily visual process as factors such as aesthetics and functionality will come into play, though I do not exclude aural considerations entirely as consumers may receive word of mouth recommendations or discuss the products with a sales assistant. In traditional retail premises, the average consumer will be viewing and handling items. In an online website or mail order catalogue, a consumer will be viewing images of the goods before selection. When making a purchase, factors such as size, material, colour, and cost (which will vary according to the item) may be considered. Furthermore, the general public are likely to purchase the goods fairly frequently. Accordingly, taking all this into account, the average consumer will likely pay a medium degree of attention during the purchasing process.


Comparison of marks

21. It is clear from *Sabel BV v. Puma AG* that the average consumer normally perceives a trade mark as a whole and does not proceed to analyse its various details. The same case also explains that the visual, aural and conceptual similarities of the trade marks must be assessed by reference to the overall impressions created by them, bearing in mind their distinctive and dominant components. The CJEU stated in *Bimbo SA v OHIM*, that:

“34. [...] it is necessary to ascertain, in each individual case, the overall impression made on the target public by the sign for which registration is sought, by means of, inter alia, an analysis of the components of a sign and of their relative weight in the perception of the target public, and then, in the light of that overall impression and all factors relevant to the circumstances of the case, to assess the likelihood of confusion.”

22. It would be wrong, therefore, to artificially dissect the trade marks, although it is necessary to take into account their distinctive and dominant components and to give due weight to any other features which are not negligible and therefore contribute to the overall impressions created by the trade marks.

23. The trade marks to be compared are as follows:

Opponent's mark (Series of two)	Applicant's mark
i. PARADAIZA ii. PARA-DAIZA	

24. With regard to the similarity of the marks, in its statement of grounds, the opponent states the following:

“We oppose the trademark PARADISA on relative grounds, the likelihood of confusion: and identical/similar brand name, sold in the UK under Class 25 Clothing resulting in a likelihood of confusion on the part of the public.”

25. With regard to the similarity of the marks, in its counterstatement, the applicant submits the following:

“There is no likelihood of confusion. We are not “an identical/similar brand name, sold in the UK under class 25 clothing resulting in a likelihood of confusion on the part of the public.

Your brand name PARADAIZA has a significant difference in the characters of the text to the name of the brand PARADISA. The last four letters “AIZA” are significantly different to my last letters “ISA” in terms of look and sound.

Your brad [sic] name has 9 characters, mine has 8.

There are substantial differences in the look and sound, Paradisa is both spelled with and pronounced using a soft “s”. The last part of the word “dianza”, has 3 syllables rather than my 2.”

Overall impression

26. The opponent's marks (series of two), comprise the words (i) 'PARADAIZA' and (ii) 'PARA-DAIZA', presented in black standard uppercase letters without any stylisation. There are no other elements to contribute to the overall impression of the marks which reside in the words themselves.

27. The applicant's mark is figurative comprising a white circular border-like device. The device contains a centrally positioned white wavy line, stretching from the left of the circular device to the right. The background colour above the wavy line is black, and features what appears to be the representation of two white stylised palm-trees, and a small white semi-circular line device. The background below the wavy line is white and features the stylised word 'PARADISA' presented in large, black, uppercase letters. The word follows the shape of the bottom half of the circle. As a result, the word appears stretched, resulting in the letter 'P' at the start of the word and the letter 'A' at the end of the word (PARADISAA) being slightly obscured, though are still legible. The white circular device and its contents sit on a black square background. I find the word 'PARADISA' to be the most dominant element of the mark due to its size and stylisation, and the fact that the word spans the width of the mark. Furthermore, I keep in mind *MigrosGenossenschafts-Bund v EUIPO*, T-68/17, where it was stated that:

“...in the case of a mark consisting of both word and figurative elements, the word elements must generally be regarded as more distinctive than the figurative elements, or even as dominant, since the relevant public will keep in mind the word elements to identify the mark concerned, the figurative elements being perceived more as decorative elements...”

28. Slightly less dominant is the white circular device, the figurative palm trees, semi-circle line, and wavy line. However, these elements still contribute to the overall impression of the mark. I find that the black background square will have little impact on the consumer.

Visual Comparison

29. Visually, the marks coincide insofar as they share the same first five letters, namely 'PARAD'. This similarity appears at the beginning of the respective marks, being where consumers tend to focus² as this position is generally considered to have more impact due to consumers in the UK reading from left to right. Furthermore, the marks all end with the same letter, namely 'A'. However, the marks differ in that the opponent's marks contain nine letters, whereas the applicant's mark contains eight letters. In addition, whilst it is noted that both marks contain the letter 'I' this appears as the sixth letter in the applicant's mark, whereas it is the seventh letter in the opponent's marks. In addition, the opponent's second mark in the series (ii), contains a hyphen ('PARA-DAIZA') which is not replicated in the applicant's mark. Furthermore, the stylisation of the word 'PARADISA' and the figurative elements present in the applicant's mark are not replicated in the opponent's marks. Accordingly, weighing up the similarities with the differences, I consider the marks to be visually similar to a medium degree.

Aural Comparison

30. Aurally, the opponent's series of two marks are both likely to be pronounced as 'PARA-DAY-SA'. The only element of the applicant's mark that will be pronounced is the word 'PARADISA', which is likely to be pronounced 'PARA-DIE-SA'. With regard to the hyphen present in the opponent's mark (ii), it is my understanding that hyphens can be used to either join words together or divide words, dependent on certain styles. I am of the view that the use of the hyphen, in this circumstance, has been added to help with the pronunciation of the mark, by separating 'PARA' from 'DAIZA' to avoid, for example, mispronunciation. Accordingly, I consider that the hyphen indicates a break in the letters and pronunciation, as previously stated. The break will not be pronounced as 'break' but will be a natural pause in the pronunciation attributed to the hyphen in the mark. The different letters and different letter sequence between the marks, namely the letters 'AIZ' in the opponent's marks, and the letters 'IS' in the applicant's mark, will in my view, have a minimal impact on the overall pronunciation

² *El Corte Inglés, SA v OHIM*, Cases T-183/02 and T-184/02

of the words 'PARADAIZA', 'PARA-DAIZA' and 'PARADISA'. Overall, I consider the marks to be aurally similar to a high degree.

Conceptual Comparison

31. For a conceptual message to be relevant it must be capable of immediate grasp by the average consumer. This is highlighted in numerous judgments of the GC and the CJEU including *Ruiz Picasso v OHIM* [2006] e.c.r.-I-643; [2006] E.T.M.R 29. The assessment must, therefore, be made from the point of view of the average consumer.

32. Conceptually, the average consumer is likely to perceive the opponent's marks and the applicant's mark as meaningless invented words. With regard to the figurative elements present in the applicant's mark, these will merely be understood as representing particular shapes and designs, etc., but will have no clear relationship with the invented word 'PARADISA'. Accordingly, the marks are conceptually neutral.

Distinctive character of the earlier marks

33. In *Lloyd Schuhfabrik Meyer*, the CJEU stated that:

"22. In determining the distinctive character of a mark and, accordingly, in assessing whether it is highly distinctive, the national court must make an overall assessment of the greater or lesser capacity of the mark to identify the goods or services for which it has been registered as coming from a particular undertaking, and thus to distinguish those goods or services from those of other undertakings (see, to that effect, judgment of 4 May 1999 in Joined Cases C-108/97 and C-109/97 *Windsurfing Chiemsee v Huber and Alternberger* [1999] ECR I-0000, paragraph 49).

23. In making that assessment, account should be taken, in particular, of the inherent characteristics of the mark, including the fact that it does or does not contain an element descriptive of the goods or services for which it has been registered, the market share held by the mark, how intensive, geographically widespread and long-standing use of the mark has been;

the amount invested by the undertaking in promoting the mark, the proportion of the relevant section of the public which, because of the mark, identifies the goods or services as originating from a particular undertaking, and statements from chambers of commerce and industry or other trade and professional associations (see *Windsurfing Chiemsee*, paragraph 51).”

34. Registered trade marks possess varying degree of inherent distinctive character, ranging from the very low, because they are suggestive or allusive of a characteristic of the goods, to those with high inherent distinctive character, such as invented words which have no allusive qualities. The distinctive character of a mark can be enhanced by virtue of the use that has been made of it.

35. Although the distinctiveness of a mark can be enhanced by virtue of the use that has been made of it, the opponent has not filed any evidence of use in relation to its mark. Consequently, I have only the inherent position to consider.

36. The opponent’s series of two marks comprise the words ‘PARADAIZA’ and ‘PARADAIZA’. As previously mentioned, I consider that the words will be viewed as invented, which are neither allusive nor descriptive in relation to the goods and services for which the mark is registered. Consequently, I consider the opponent’s series of two marks to be inherently highly distinctive.

Likelihood of confusion

37. In determining whether there is likelihood of confusion, I must take all of the above factors into account and consider if there is a likelihood of confusion for the average consumer.

38. Confusion can be direct or indirect. Direct confusion involves the average consumer mistaking one mark for the other. While indirect confusion is where the average consumer realises the marks are not the same but puts the similarity that exists between the marks and the goods down to the responsible undertakings being the same or related. There is no scientific formula to apply in determining whether

there is a likelihood of confusion; rather, it is a global assessment where a number of factors need to be borne in mind. The first is the interdependency principle i.e. a lesser degree of similarity between the respective goods may be offset by a greater degree of similarity between the marks and vice versa. I must bear in mind the distinctive character of the earlier marks, the average consumer for the goods and the nature of the purchasing act. To do so, I must recognise that the average consumer rarely has the opportunity to make direct comparisons between trade marks and must instead rely upon the imperfect picture of them that he has retained in his mind.

39. Earlier in the decision I concluded that the respective marks are visually similar to a medium degree, aurally similar to a high degree, and conceptually neutral. I have found the earlier marks to be inherently highly distinctive. I have found the average consumer to be a member of the general public who will pay a medium degree of attention during the purchasing process. I have found the purchasing process to be predominantly visual, although I do not discount an aural component. I have found the goods to be identical.

40. I recognise that there are clearly visual differences between the marks created by the figurative elements present in the applicant's mark. However, as previously mentioned, I consider the word in the applicant's mark to be the most dominant element due to its size and stylisation and the fact that it spans the width of the mark, while also keeping in mind, *MigrosGenossenschafts-Bund v EUIPO*, T-68/17, as previously mentioned. I find that the figurative elements are likely to be attributed little trade mark significance, as they will merely be viewed as decorative, and therefore are likely to be forgotten by the average consumer when trying to recall the mark. Furthermore, I consider it likely that the average consumer will overlook the different letters and different letter sequence in the marks, namely 'AIZ' in the opponent's marks ('PARADAIZA / PARA-DAAIZA'), and 'IS' in the applicant's mark ('PARADISA'). In my view, it is entirely plausible that the average consumer could misremember the different letters in the marks and imperfectly recall PARADAIZA / PARA-DAAIZA as PARADISA or vice versa, particularly as the beginnings of words tend to have more

impact than the ends.³ Therefore, bearing in mind the high distinctiveness of the earlier marks, the visual and aural similarity of the marks, and the imperfect recollection of the average consumer, I consider there is a likelihood of direct confusion. This is further supported by the identity of the goods in question and the lack of a clear concept for either mark, on the basis that, in the absence of a strong conceptual hook, the average consumer will not have a strong conceptual message to assist them in differentiating between the marks.

41. In the event that I am wrong about direct confusion, I will now go on to consider indirect confusion. I acknowledge that a finding of indirect confusion should not be made merely because the two marks share a common element. However, it is not sufficient that a mark merely calls to mind another mark:⁴ this is mere association not indirect confusion.

42. In *L.A. Sugar Limited v By Back Beat Inc*, Case BL O/375/10, by Iain Purvis Q.C. (as he then was), as the Appointed Person, explained that:

“16. Although direct confusion and indirect confusion both involve mistakes on the part of the consumer, it is important to remember that these mistakes are very different in nature. Direct confusion involves no process of reasoning – it is a simple matter of mistaking one mark for another. Indirect confusion, on the other hand, only arises where the consumer has actually recognized that the later mark is different from the earlier mark. It therefore requires a mental process of some kind on the part of the consumer when he or she sees the later mark, which may be conscious or subconscious but, analysed in formal terms, is something along the following lines: “The later mark is different from the Page 17 of 19 earlier mark, but also has something in common with it. Taking account of the common element in the context of the later mark as a whole, I conclude that it is another brand of the owner of the earlier mark.

17. Instances where one may expect the average consumer to reach such a conclusion tend to fall into one or more of three categories:

³ *El Corte Inglés, SA v OHIM*, Cases T-183/02 and T-184/02.

⁴ *Duebros Limited v Heirler Cenovis GmbH*, BL O/547/17

(a) where the common element is so strikingly distinctive (either inherently or through use) that the average consumer would assume that no-one else but the brand owner would be using it in a trade mark at all. This may apply even where the other elements of the later mark are quite distinctive in their own right ('26 RED TESCO' would no doubt be such a case).

(b) where the later mark simply adds a non-distinctive element to the earlier mark, of the kind which one would expect to find in a subbrand or brand extension (terms such as 'LITE', 'EXPRESS', 'WORLDWIDE', 'MINI' etc.).

(c) where the earlier mark comprises a number of elements, and a change of one element appears entirely logical and consistent with a brand extension ('FAT FACE' to 'BRAT FACE' for example)".

43. Further, in *Liverpool Gin Distillery Ltd & Ors v Sazerac Brands, LLC & Ors* [2021] EWCA Civ 1207, Arnold LJ referred to the comments of James Mellor QC (as he then was), sitting as the Appointed Person in *Cheeky Italian Ltd v Sutaria* (O/219/16), where he said at [16] that "a finding of a likelihood of indirect confusion is not a consolation prize for those who fail to establish a likelihood of direct confusion". Arnold LJ agreed, pointing out that there must be a "proper basis" for concluding that there is a likelihood of indirect confusion where there is no likelihood of direct confusion.

44. For a finding of indirect confusion, I would need to conclude that consumers will notice the common letters 'PARAD__A' / 'PARA-D__A' / 'PARAD__A', identically present in the marks, while at the same time recalling the differences between them and assume that the marks are from the same or related undertakings. However, to my mind, the stated differences between the letters in the marks, namely 'PARADAIZA / PARA-DAIZA' versus 'PARADISA', are not a logical brand extension or sub-brand and, as such, I do not see a logical step which would induce consumers to be indirectly confused. Rather, I am of the view that the average consumer would put the presence of the common elements 'PARAD' and 'A' in the marks down to coincidence rather than economic connection.

Conclusion

45. The opposition under Section 5(2)(b) of the Act has succeeded. Subject to any successful appeal, the application will be refused.

Costs

46. Awards of costs are governed by TPN 2/2016. The opponent has been successful and would normally be entitled to a contribution towards its costs. However, as the opponent is unrepresented, the tribunal wrote to the opponent on 28 July 2023 and invited it to indicate whether it intended to make a request for an award of costs. The opponent was informed that, if so, it should complete a pro-forma, providing details of the actual costs incurred and accurate estimates of the amount of time spent on various activities in dealing with the opposition. The opponent was informed that “no costs, other than official fees arising from the action... will be awarded” if the pro-forma was not completed. The opponent did not file a completed pro-forma. That being the case, I award costs to the opponent on the following basis:

Official fee:	£100
Total	£100

47. I therefore order Kwamena Bonney-Bhandal to pay Paul Mullen the sum of £100. This sum should be paid within 21 days of the expiry of the appeal period or, if there is an appeal, within 21 days of the conclusion of the appeal proceedings.

Dated this 19th day of February 2024

Joanne Roberts
For the Registrar