O/0444/25

TRADE MARKS ACT 1994

IN THE MATTER OF APPLICATION NO.
UK00003925570
BY PRIM N PROPER LTD
TO REGISTER THE TRADE MARK:

PRIM n PROPER

IN CLASSES 14, 24 and 25

AND THE OPPOSITION THERETO UNDER NO.
OP000442890
BY ELTON HODINÁRSKÁ, A.S.

Background and pleadings

1. Prim N Proper Ltd ("the applicant") applied to register the trade mark shown below, No. UK00003925570 filed on 22 June 2023.

PRIM n PROPER

It was accepted and published in the Trade Marks Journal on 7 July 2023 in respect of the following goods:

Class 14: Jewellery, costume jewellery, precious stones; horological and chronometric instruments, clocks and watches.

Class 24: Bed and table covers; travellers' rugs, textiles for making articles of clothing; duvets; covers for pillows, cushions or duvets.

Class 25: Clothing, footwear, headgear.

2. ELTON HODINÁRSKÁ, A.S. ("the opponent") opposes the above trade mark, having filed a notice of opposition, form TM7, dated 05 September 2023, on the basis of section 5(2)(b) of the Trade Marks Act 1994 ("the Act"). The opponent relies upon the following mark:

UK00903531662 ("the earlier mark"),[1] with a filing date of 31 October 2003, and a registration date of 17 March 2005.

[1] Under Article 54 of the Withdrawal Agreement, the Registry created comparable UK trade marks for all rights holders with an existing EUTM. As a result of the opponent's EUTM number 3531662 being protected as at the end of the Implementation Period, a comparable UK trade mark was automatically created. The comparable UK mark now recorded on the UK trade mark register has the same legal status as if it had been applied for and registered under UK law, and retains its original international registration date as its filing date.

The opponent is reliant upon the following goods:

Class 14: Watchmaking, watches for children.

3. The opposition is only directed against some of the goods, these are:

Class 14: Horological and chronometric instruments, clocks and watches.

4. In its Form TM7, the opponent argues that the applicant's mark is similar because they both contain the dominant element "PRIM", and the goods are similar because they all are chronometric instruments and the goods in "watchmaking" contain watches and parts thereof.

5. The applicant filed an amended Form TM8 and counterstatement denying the claims made.

6. The opponent filed evidence and both parties filed written submissions in these proceedings. Neither party requested a hearing.

7. The applicant is unrepresented; the opponent is represented by Jana Matičková.

8. This decision is taken after careful consideration of the papers.

Evidence and submissions

9. The opponent filed evidence in the form of a witness statement of Renata Červenák Nývltová, signed and dated 30 November 2023. Renata Červenák Nývltová is the President of the Board and Director of ELTON HODINÁRSKÁ, A.S. The witness statement is accompanied by 10 exhibits, RCN 1-10. The opponent's evidence in chief also included written submissions, the EUIPO Decision of 25 May 2022 and the Decision of the Second Board of Appeal of 27 March 2023.

10. The opponent also filed written submissions on 10 July 2024, accompanied by 2 exhibits, OS1 and OS2. The evidence seeks to provide dictionary definitions for the word "Prim" and the phrase "Prim and proper".

11. The applicant filed written submissions on 16 March 2024.[2]

Preliminary issue

12. The opponent relies on the decisions of the EUIPO and Second Board of Appeal referred to above, however, I note that the opposed mark in those proceedings was a figurative mark consisting of the word "PRIM" only, rather than the applied for mark, "PRIM n PROPER", that is the subject of these proceedings. Therefore, I will place little weight on those previous decisions.

DECISION

13. Section 5(2)(b) of the Act reads as follows:

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

(a)…

[2] These are revised submissions to the ones originally filed on 9 December 2023, (during the evidence rounds) due to issues with stylisation of the mark presented in applicant's original submissions.

(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."

My approach

14. By virtue of its earlier filing date, the trade mark upon which the opponent relies qualifies as an earlier trade mark pursuant to section 6 of the Act. As the earlier mark had completed its registration process more than 5 years before the application date of the mark in issue, it is subject to proof of use pursuant to section 6A of the Act. However, for reasons that will become apparent later in this decision, I do not consider that the issue of proof of use will be determinative in these proceedings, and I will conduct my assessment on the basis that the opponent retains the goods it is reliant upon. I will further proceed on the basis that the goods are identical, the opponent's "watches for children" being *Meric* identical to the applicant's "horological and chronometric instruments, clocks and watches".

Section 5(2)(b) – case law

15. The provisions of the Act relied upon in these proceedings are assimilated law, as they are derived from EU law. Although the UK has left the EU, section 6(3)(a) of the European Union (Withdrawal) Act 2018 (as amended by Schedule 2 of the Retained EU Law (Revocation and Reform) Act 2023) requires tribunals applying assimilated law to follow assimilated EU case law. That is why this decision refers to decisions of the EU courts which predate the UK's withdrawal from the EU.

16. The following principles are gleaned from the decisions of the EU courts 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, who is deemed to be reasonably well informed and reasonably circumspect and observant, but who rarely has the chance to make direct comparisons between marks and must instead rely upon the imperfect picture of them he has kept in his 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 to mind the earlier mark, 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;

(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.

The average consumer and the nature of the purchasing act

17. As indicated in the caselaw cited above, it is necessary to decide who the average consumer is for the parties' goods and how they purchase them. "Average consumer" in the context of trade mark law means the "typical consumer."[3] 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 in question.[4]

18. I find that the average consumer for the goods at issue will be a member of the general public. I consider the costs of the goods to range from relatively low (for

[3] *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).
[4] *Lloyd Schuhfabrik Meyer*, Case C-342/97.

watches made with low cost materials) to possibly fairly high (for products crafted from valuable metal such as platinum or gold and that may include precious or semi-precious stones). The average consumer will likely consider the material used, the size, fit, and aesthetic appearance. The professional public is likely to carry out further considerations on the materials' quality. I find the degree of attention will be medium (average). The goods are likely to be obtained following a visual inspection of the goods from glass cabinet displays within jewellery stores or by self-selection from the shelves in retail outlets. A similar process will apply to goods online as they will be selected after viewing images on websites. Overall, I am of the view that visual considerations would dominate the purchasing process, however, I do not discount aural considerations will play their part, particularly when advice is sought from sales representatives or for word of mouth recommendations.

Comparison of the trade marks

19. It is clear from *Sabel BV v. Puma AG* (particularly paragraph 23) that the average consumer normally perceives a 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 marks must be assessed by reference to the overall impressions created by the marks, bearing in mind their distinctive and dominant components. The CJEU stated at paragraph 34 of its judgment in Case C-591/12P, *Bimbo SA v OHIM*, that:

> ".....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."

20. It would be wrong, therefore, to artificially dissect the trade marks, although, it is necessary to take into account the distinctive and dominant components of

the marks and to give due weight to any other features which are not negligible and therefore contribute to the overall impressions created by the marks.

21. The respective trade marks are shown below.

Opponent's trade mark	Applicant's trade mark
	PRIM n PROPER

Overall impression

22. The opponent's mark is a black and white figurative mark which includes the word "MANUFACTURE" in standard typeface in upper case at the top of the mark in a semi circle (and with asterisks at either end of the word) above the word "PRIM" which is in large stylised font at the centre of the mark. Beneath this are the digits "1949" in standard typeface, which, in my view, will be perceived as the date in which the mark was established. The overall impression is dominated by the word "PRIM", with the word "MANUFACTURE" and the date "1949" playing a smaller role as they will be perceived as purely denoting the establishment date of the mark and the fact that the goods are manufactured by "PRIM". Alternatively, they will be perceived as the date that the goods were first manufactured: either understanding will lead to these elements playing a lesser role within the opponent's mark.

23. As for the contested mark, this is a word only mark presented in a mix of upper and lower case. I understand the letter "n" between the words "PRIM" and "PROPER" to be short for the word "and", with this in mind, I consider the words "PRIM n PROPER" to form a unit as together they will be regarded as a well

known phrase in the English language. Consequently, the overall impression lies in the phrase as a whole.

Visually

24. The marks are visually similar to the extent that they both contain the word "PRIM". However, this is the only point of overlap between the marks, with both marks including several different elements that are not found within the other's mark. For example, the opponent's mark contains the additional word "MANUFACTURE" and the date "1949" which are absent from the applicant's mark, whereas the applicant's mark has the distinct extra letter and word "n PROPER" which are not replicated within the opponent's mark. Consequently, I consider the competing marks to be visually similar to a low degree.

Aurally

25. In my view, consumers will not attempt to verbalise the date "1949" as this will merely be seen as referring to the establishment date of a company or mark which consumers do not generally tend to articulate. Neither will the word "MANUFACTURE" be pronounced as this will be perceived as simply denoting the fact that the goods have been manufactured. As such, the opponent's mark will encompass only one syllable stemming from the word "PRIM". Conversely, the applied for mark will contain four syllables, i.e. "PRIM-NN-PROP-ER". Consequently, I find that the competing marks are aurally similar to a low degree.

Conceptually

26. For a conceptual message to be relevant it must be capable of immediate grasp by the average consumer.[5] I acknowledge the opponent's submissions on the conceptual overlap between the words "PRIM" and "Prim and proper", which it identifies as an idiom, the salient points being replicated below:

[5] *Ruiz Picasso v OHIM* [2006] E.T.M.R 29.

"*Conceptually, the trademark MANUFACTURE PRIM 1949 has the meaning of its dominant and distinctive element - of the word "prim" (the word "manufacture" and the year "1949 have the meaning of being manufactured since 1949, as stated above, therefore are only descriptive and have decreased value in construing the concept of the mark as a whole). According to the Cambridge dictionary, the meaning of the word "prim" is "very formal and correct in behaviour and easily shocked by anything rude". An example of the use of the word "prim" given by the Cambridge dictionary reads: "She's much too prim and proper to drink pints of beer."*

Attached as exhibit OS 1 is the printscreen of the on-line Cambridge dictionary – the meaning of the word "prim" in English.

The Applicant's mark "PRIM N PROPER" has substantially the same conceptual meaning as the word "prim" explained above. "Prim and proper" is an English idiom with the following meaning: "Someone who is prim and proper always behaves in the correct way and never breaks the rules of etiquette." (according to UsingEnglish.com - attached as exhibit OS2 is the printscreen with the explanation of the idiom).

Obviously both trademarks will be perceived as highly similar or identical from the conceptual point of view by the consumers. This follows also from the fact that the Cambridge dictionary directly suggests, as the common example of the use of the word "prim", the use of the whole idiom "prim and proper". In other words, the word "prim" suggests the use of the whole idiom "prim and proper".[6]

27. I accept that as both marks share the word "PRIM" there is a degree of conceptual overlap in the meaning of this word which is dictionary defined as *very formal and correct in behaviour and easily shocked by anything rude*. However, the applicant's mark will be perceived as having a unitary meaning

[6] Opponent's written submissions, page 2, point 3.

as a well known phrase or idiom, 'prim and proper' rather than just as a standalone adjective. The marks further differ in the added concepts found within the opponent's mark surrounding the manufacture of the goods and what will be perceived as the establishment date of the mark. However, I accept that these additional concepts are weak. Overall, I find that the marks are conceptually similar to at least a medium degree.

Distinctive character of the earlier mark

28. In *Lloyd Schuhfabrik Meyer & Co. GmbH v Klijsen Handel BV*, Case C-342/97 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 Attenberger* [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)."

29. Registered trade marks possess varying degrees of inherent distinctive character, ranging from the very low, because they are suggestive or allusive of a characteristic of the goods or services, to those with high inherent distinctive character, such as invented words which have no allusive qualities.

30. As discussed above, the opponent's mark is a black and white figurative mark which includes the word "MANUFACTURE" in standard typeface in upper case at the top of the mark in a semi circle (with asterisks at either end of the word) above the word "PRIM" which is in large stylised font at the centre of the mark. Beneath this are the digits "1949" in standard font, which, in my view, will be perceived as the date in which the company or mark was established. Equally the word "MANUFACTURE" will be understood as merely referring to the fact that the goods are manufactured by "PRIM", or as aforementioned, in conjunction with the date "1949", when the goods were first manufactured. Consequently, the distinctive character of the mark lies in the word "PRIM". As discussed above, the word "PRIM" is a dictionary defined word. I note that it is not descriptive or allusive of the goods for which it is registered and as such it enjoys a medium level of distinctive character. Whilst the positioning of the elements within the mark contribute to the overall distinctiveness, this does not have the effect of elevating the overall distinctiveness of the mark to a level above medium. Consequently, it follows that I find that the earlier mark possesses a medium degree of inherent distinctive character.

31. As for whether there is any enhanced distinctiveness demonstrated by the evidence provided, I keep in mind that enhanced distinctiveness relates only to use within the UK. I note from the witness statement of Renata Cervenak Nyvltova, that whilst the turnover for all EU countries is over 2 million euros for each of the years 2018 to 2019, separate turnover figures for the UK for each of these years has not been provided. However, I do have the turnover figures for the UK for 2021 and 2023, these are 10,600 euros and 8,500 euros respectively. Further, there are only a small number of invoices for watches under the earlier mark addressed to the UK between the years of 2018 and 2023. As for the publicity of the earlier mark, I observe that the articles and

magazine evidence provided are in the Czech language and are not specifically targeted at UK consumers. Overall, having considered the evidence of the mark on the UK market, I consider that the evidence as a whole does not strike me as indicative of a level of activity that would lead to the capacity of the mark, measured from the perspective of the average consumer, to more greatly identify the goods upon which the opponent relies as coming from a particular undertaking, beyond its inherent capability to do so.

Likelihood of confusion

32. 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 trade marks may be offset by a greater degree of similarity between the respective goods and vice versa. As I mentioned above, it is necessary for me to keep in mind the distinctive character of the opponent's trade mark, the average consumer for the goods and the nature of the purchasing process. In doing so, I must be alive to the fact 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 they have retained in their mind.

33. I have found:

- The goods to be identical.
- The average consumer of the goods will be the general public who will pay a medium (average) level of attention during the purchasing process.
- The purchasing process will be predominantly visual, however, I have not discounted aural considerations.

- The competing marks are visually and aurally similar to a low degree and conceptually similar to at least a medium degree.
- The earlier mark to be inherently distinctive to a medium degree, the evidence before me not having enhanced the level of distinctiveness.

34. Whilst the competing marks both contain the word “PRIM” each of the respective marks also contain further additional elements which would not go unnoticed by the average consumer and would prevent the marks from being mistaken for one another. Therefore, I do not consider there to be a likelihood of direct confusion even on identical goods.

35. 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. Furthermore, it is not sufficient that a mark merely calls to mind another mark:[7] This is mere association not indirect confusion.

36. 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 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.

[7] *Duebros Limited v Heirler Cenovis GmbH,* BL O/547/17

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

(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 sub brand 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)".

37. 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.

38. As referred to in the above case law, indirect confusion exists where the differences between the marks are noticed and those differences point to the existence of an economic relationship between the marks at issue. As highlighted above, *L.A. Sugar* sets out three main categories of indirect confusion to consider that indirect confusion typically falls into.

39. Taking the first category identified, where the common element is so strikingly distinctive that no-one other than the earlier trade mark owner would be using it in trade. I do not consider the shared word “PRIM” which is an ordinary dictionary defined word is so strikingly distinctive that it would lead the average consumer to believe that only the opponent would be using it in trade. As established above, it has a medium level of inherent distinctive character which has not been enhanced through use.

40. Turning next to the second category laid out in *L.A. Sugar,* where the later mark simply adds a non-distinctive element to the earlier mark of the kind that consumers would expect to find in sub brands or brand extensions. As can be seen from the examples provided above in *L.A. Sugar*, these are typically separate words that are in frequent use across brands, such as ‘mini’, ‘express’, or ‘worldwide’. In my view, the addition of the distinctive letter and word “n PROPER” within the applicant’s mark fails to engage this category as it is not merely a simple word which is bolted on and that is regularly used within sub brands or brand extensions. The additional elements found within the contested mark are not descriptive or allusive of the parties’ goods, neither are they words such as ‘lite’ or ‘express’ that are commonly used to describe common characteristics of goods. Indeed, the elements “n PROPER” hang together with the word “PRIM” to create a common phrase/idiom and play an equal role in the overall impression of the contested mark. Consequently, I am unconvinced that the second category as set out in *L.A. Sugar* applies to the competing marks.

41. Finally, the third category, where the earlier mark comprises a number of elements, and a change to one of those elements appears entirely consistent with a brand extension. In this case, the differences between the marks do not denote any clear sub brand or brand extension consistent with that of FAT FACE and BRAT FACE. This is because more is involved than merely exchanging one element in the mark for another in the same way as FAT FACE and BRAT FACE. I therefore do not consider that there is any likelihood of confusion based on this third category of indirect confusion.

42. I keep in mind that the helpful examples provided in *L.A. Sugar* are not supposed to be taken as an exhaustive list. However, despite there being an overlap in their conceptual messages, I do not consider that consumers will believe that there is an economic link between the marks on the basis that "PRIM" would be seen as a coherent alternative use of the idiom "PRIM n PROPER" or that the use of "PRIM" solus credibly extends as a brand to the whole of the commonly used unitary phrase. Considered in relation to each other, the marks are incongruous. They are not plausible brand variants. Consequently, I find that there is no basis for finding that there is a likelihood of indirect confusion even when factoring in the identity of the goods at issue.

CONCLUSION

43. The opposition under section 5(2)(b) of the Act has failed. Therefore, subject to any successful appeal against my decision, the application will proceed to registration.

COSTS

44. As the applicant has been successful, it is therefore, entitled to a contribution towards its costs. As the applicant is unrepresented, it was invited by the Tribunal on 13 February 2024 to indicate whether it intended to make a request for an award of costs in the event that it was successful, and if so, it was requested to complete a costs proforma including accurate estimates of the number of hours spent on a range of given activities relating to defending the proceedings. The deadline for providing the costs proforma was 27 February 2024. However, the applicant failed to file a completed cost proforma with the Tribunal. Consequently, no award for costs will be made other than for the official fees. I therefore award costs to the opponent on the following basis:

Official fees	£100
TOTAL	**£100**

45. I therefore order ELTON HODINÁRSKÁ, A.S. to pay Prim n Proper Ltd the sum of £**100**. The above sum should be paid within twenty-one days of the expiry of the appeal period or, if there is an appeal, within twenty-one days of the conclusion of the appeal proceedings.

Dated this 21st day of May 2025

Sarah Wallace
For the Registrar