

O/1118/24

TRADE MARKS ACT 1994

**IN THE MATTER OF
UK REGISTRATION NO. 3731788
IN THE NAME OF
MARIA EUGENIA LOPEZ
IN RESPECT OF THE FOLLOWING TRADE MARK:**

QJMOTOR

IN CLASS 12

AND

**AN APPLICATION FOR DECLARATION OF INVALIDITY
THERE TO UNDER NO. 505789**

**BY
ZHEJIANG QIANJIANG MOTORCYCLE CO., LTD.**

Background & Pleadings

1. The trade mark (“**contested mark**”) shown on the front page of this decision stands registered in the name of Maria Eugenia Lopez (“**the registered proprietor**”). I note that by way of form TM16 the ownership of the mark was assigned to the registered proprietor from ‘Prestaciones Y Asesoria Juridica Patmark Limitada’ (“**the original proprietor**”). This change of ownership has been officially recorded in the IPO database as of 9 June 2023, with an effective date of 30 May 2023. The application to register the contested mark (“**the contested application**”) was filed on 10 December 2021 in the United Kingdom and completed its registration procedure on 27 May 2022 in respect of the following goods:

Class 12: Vehicles; Land vehicles and conveyances; Vehicles for locomotion by land, air, water or rail; Electric vehicles; Parts and fittings for vehicles; Bicycles; Electric bicycles; Motorcycles; Scooters [vehicles]; Mopeds; Self-balancing scooters; Parts and fittings for land vehicles; Bodywork parts for vehicles; Dashboards; Front forks for motorcycles; Brake systems for vehicle; Motorcycle saddlebags; Shock absorbers for motorcycles; Rack trunk bags for motorcycles; Fitted motorcycle covers; Motors for motorcycles; Engines for motorcycles; Wheels; Tires; Warning horns for motorcycles; Motors and engines for land vehicles; Motors for land vehicles; Engines for land vehicles.

2. On 1 February 2023, Zhejiang Qianjiang Motorcycle Co., Ltd. (“**the applicant**”) filed an application to have this trade mark declared invalid under the provisions of Section 3(6) of the Trade Marks Act 1994 (“**the Act**”) ¹, which are relevant in invalidation proceedings under Section 47(1)

¹ 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.

of the Act. The applicant claims that it is a large and established Chinese company that manufactures motorcycles and is the owner of the mark QJMOTOR and that the original proprietor applied for the mark in the knowledge that it was not the owner of the mark. It adds that the original proprietor was a shell company in Chile and claims that it had no intention to use the contested mark itself. The applicant asserts that the original proprietor had no factories or any other business establishments that would suggest that applying for a trade mark in Class 12 was a commercially logical decision. The applicant claims that the original proprietor intended to block, frustrate or disrupt the applicant's activities in the UK, or to extract payment or other consideration from the applicant, or get an unfair advantage over the applicant and its potential distributors, or dishonestly present itself as the authorised or exclusive distributor of the applicant's products.

3. Following the assignment of the contested mark, the registered proprietor filed a notice of defence denying the applicant's claims.
4. Only the applicant filed evidence and written submissions.
5. No hearing was requested and so this decision is taken following a careful perusal of the papers.
6. In these proceedings, the registered proprietor is represented by Trademarkit LLP, and the applicant is represented by IPEY.

Evidence

7. The applicant's evidence comes from two witness statements.

Witness statement of Mr Haibin Wang

8. Mr Haibin Wang is the Secretary of Directorate of the applicant, a position which he has held for 23 years. His witness statement is dated 3 November 2023. Mr Wang provides historical information about the applicant and its

products. In particular, he states that his company devised the mark QJMOTOR around 29 May 2020 and had applied to register it in numerous jurisdictions before the date of application for the contested mark. **Exhibit QJ4** contains a list of these filings. He says that “QJ” is an abbreviation of Qianjiang in his company’s name.

9. Mr Wang also states that the applicant exports QJMOTOR motorcycle goods in different countries, including the UK. He mentions that such exports to the UK commenced on 20 May 2021. He further remarks that “the market in the United Kingdom for QJMOTOR motorcycles is experiencing rapid development.” Additionally, he provides approximate sales figures for 2021 in the UK, which totalled £1,584.
10. I now come to **Exhibits QJ2 and QJ3**. The former contains screenshots dated 16 January 2021 from the applicant’s website. The latter consists of: screenshots dated 22 September 2020 demonstrating an online article from *bennetts.co.uk* titled “QJMOTOR reveals 2021 range in full”, which is said to be “one of the UK’s major motorcycle retailers (Bennetts)”; and, screenshots dated 19 March 2021 from *themotorbikeforum.co.uk* depicting an online article titled “New QJMotor 600cc and 700cc Models”.
11. **Exhibit QJ1** contains undated screenshots from the website *marcaria.cl* illustrating the Terms and Conditions (“T&C”) of the company named Marcaria. Mr Wang states that the original proprietor operates under this name in Chile. With his witness statement, Mr Wang provides a machine translated excerpt from the above T&C as follows:

““Company” is Prestaciones Y Asesoría Jurídica Patmark Limitada, a company whose mission is to provide legal advice and representation services, promoting, facilitating and granting registration services for trademarks and domain names and other services related to them.”

Mr Wang also provides a second machine translated excerpt from the homepage of the above website, which states that:

“Additionally, for more than 17 years, Marcaria.cl has been part of the Marcaria.com network, a company specialized in the registration and protection of trademarks and domain names at an international level.”

12. Mr Wang infers from these documents that Prestaciones Y Asesoría Jurídica Patmark Limitada is part of the law firm Marcaria, which, he notes, acted as the representative in the filing of the contested application. Mr Wang stresses in his witness statement that it is not normal for a law firm to either branch out into manufacturing motorcycles or trade mark licensing. In addition, he states that that his company could not find anyone named Maria Eugenia Lopez, the registered proprietor in these proceedings, in Argentina linked to motorcycle manufacturing, although there are multiple individuals with that name, including a science television program host.
13. **Exhibits QJ4 and QJ5** contain lists of trade mark applications, including details such as registration number, application date, and status, filed by the applicant and Prestaciones Y Asesoría Jurídica Patmark Limitada, respectively, in various countries. As to Exhibit QJ5, I note that registration has been sought in multiple countries, with a particular emphasis on South America.
14. **Exhibit QJ6** comprises an excerpt, shown below, from the transcript of the Appeal Hearing pertaining to Cancellation Application CA000505788. This is in relation to a different case from the one at hand, although both cases involve the same parties.

THE APPOINTED PERSON: I detected that you are having difficulties on instructions. Then I looked at this and I thought **what is a law firm in Santiago in Chile doing applying in the first place for this registration class 12? There is no - it is just there. Then I find that it ends up being assigned to your client, who is a lady who seems to be resident in Buenos Aires.** At the moment, just on those bare facts, I cannot see that the surface has even been scratched on the question of whether there are extenuating circumstances or compelling reasons; there is a straight up and down default.

MR. SORENTI: Yes, well, it is certainly a strange case.....

Witness statement of Mr Huw Evans

15. Mr Huw Evans of IPEY Limited is the Director of IPEY Limited, a position which he has held since August 2021. His statement is dated 6 November 2023.
16. In his witness statement, Mr Evans states the following:

“ [...]

5. I have had numerous dealings with marcaria.com since 2008 and have used them to for such things as filing a client's Trade Marks in the UAE and registering a client's domains in China. I am aware that their prices are at the low end of the scale.

6. I conducted searches today on the website of the Intellectual Property Regulation Board (IPREG) for Marcaria and Marcaria.com but revealed nothing, so believe that they are unregulated.

7. I conducted non-exhaustive searches today for the number of UK Trade Mark Applications and Registrations which list Marcaria.com and MARCARIA.COM as representative and found that they act as representatives on at least more than 600 UK Trade Mark Applications and Registrations. There is now produced and shown to

me Exhibit HE-1 which is a print-out of the results of the searches that I carried out for the number of UK Trade Mark Applications and Registrations which list Marcaria.com and MARCARIA.COM as representative.

8. My experience as a Director of 2 Regulated firms and as a Patent and Trade Mark Attorney is that it is not normal for firms or individuals practising in the Trade Mark field to branch out into manufacturing complex items such as motorcycles or indeed any other kind of goods. It is not normal for them to branch out into trade mark licensing.

9. In my opinion, the fact that a law firm in Chile filed this application and numerous other applications in the UK and elsewhere for a plurality of marks which are identical to the Applicant's Trade Marks completely lacks commercial logic.

10. 90% of the current clients of my firm are Chinese and I am aware that it is extremely common for Chinese brand owners to have their marks fraudulently registered overseas by third parties with the deliberate intention of seeking payment to assign or transfer marks or to permit their use in territories where non-existent or inadequate trade mark protection exists. Typically, such third parties are also Chinese and will hide behind a shell company or the identity of a relative. [...]"

Decision

17. Section 47 of the Act states that:

"47. (1) The registration of a trade mark may be declared invalid on the ground that the trade mark was registered in breach of section 3 or any of the provisions referred to in that section (absolute grounds for refusal of registration).

[...]

(6) Where the registration of a trade mark is declared invalid to any extent, the registration shall to that extent be deemed never to have been made: Provided that this shall not affect transactions past and closed.”

18. Section 3(6) of the Act states:

“(6) A trade mark shall not be registered if or to the extent that the application is made in bad faith.”

19. Also of relevance is Section 32(3) of the Act which states:

“(3) The application shall state that the trade mark is being used, by the applicant or with his consent, in relation to those goods or services, or that he has a bona fide intention that it should be so used.”

20. In *Sky Limited & Ors v Skykick, UK Ltd & Ors*, [2021] EWCA Civ 1121 the Court of Appeal considered the case law from *Chocoladefabriken Lindt & Sprüngli AG v Franz Hauswirth GmbH*, Case C-529/07 EU:C:2009:361, *Malaysia Dairy Industries Pte. Ltd v Ankenævnetfor Patenter Varemærker* Case C-320/12, EU:C:2013:435, *Koton Mağazacılık Tekstil Sanayi ve Ticaret AŞ*, Case C-104/18 P, EU:C:2019:724, *Hasbro, Inc. v EUIPO, Kreativni Dogaaji d.o.o. intervening*, Case T-663/19, EU:2021:211, *pelicantravel.com s.r.o. v OHIM, Pelikan Vertriebsgesellschaft mbH & Co KG (intervening)*, Case T-136/11, EU:T:2012:689, and *Psytech International Ltd v OHIM, Institute for Personality & Ability Testing, Inc (intervening)*, Case T-507/08, EU:T:2011:46. It summarised the law as follows:

“68. The following points of relevance to this case can be gleaned from these CJEU authorities:

1. The allegation that a trade mark has been applied for in bad faith is one of the absolute grounds for invalidity of an EU trade mark which

can be relied on before the EUIPO or by means of a counterclaim in infringement proceedings: *Lindt* at [34].

2. Bad faith is an autonomous concept of EU trade mark law which must be given a uniform interpretation in the EU: *Malaysia Dairy Industries* at [29].

3. The concept of bad faith presupposes the existence of a dishonest state of mind or intention, but dishonesty is to be understood in the context of trade mark law, i.e. the course of trade and having regard to the objectives of the law namely the establishment and functioning of the internal market, contributing to the system of undistorted competition in the Union, in which each undertaking must, in order to attract and retain customers by the quality of its goods or services, be able to have registered as trade marks signs which enable the consumer, without any possibility of confusion, to distinguish those goods or services from others which have a different origin: *Lindt* at [45]; *Koton Mağazacılık* at [45].

4. The concept of bad faith, so understood, relates to a subjective motivation on the part of the trade mark applicant, namely a dishonest intention or other sinister motive. It involves conduct which departs from accepted standards of ethical behaviour or honest commercial and business practices: *Hasbro* at [41].

5. The date for assessment of bad faith is the time of filing the application: *Lindt* at [35].

6. It is for the party alleging bad faith to prove it: good faith is presumed until the contrary is proved: *Pelikan* at [21] and [40].

7. Where the court or tribunal finds that the objective circumstances of a particular case raise a rebuttable presumption of lack of good faith, it is for the applicant to provide a plausible explanation of the objectives and commercial logic pursued by the application: *Hasbro* at [42].

8. Whether the applicant was acting in bad faith must be the subject of an overall assessment, taking into account all the factors relevant to the particular case: *Lindt* at [37].

9. For that purpose it is necessary to examine the applicant's intention at the time the mark was filed, which is a subjective factor which must be determined by reference to the objective circumstances of the particular case: *Lindt* at [41] – [42].

10. Even where there exist objective indicia pointing towards bad faith, however, it cannot be excluded that the applicant's objective was in pursuit of a legitimate objective, such as excluding copyists: *Lindt* at [49].

11. Bad faith can be established even in cases where no third party is specifically targeted, if the applicant's intention was to obtain the mark for purposes other than those falling within the functions of a trade mark: *Koton Mağazacılık* at [46].

12. It is relevant to consider the extent of the reputation enjoyed by the sign at the time when the application was filed: the extent of that reputation may justify the applicant's interest in seeking wider legal protection for its sign: *Lindt* at [51] to [52].

13. Bad faith cannot be established solely on the basis of the size of the list of goods and services in the application for registration: *Psytech* at [88], *Pelikan* at [54].”

21. The following points are apparent from the pre-Sky case-law about registering trade marks in bad faith:

(a) Although it may be a relevant factor, the mere fact that the trade mark applicant knew that another party was using the trade mark in another territory does not establish bad faith: *Malaysia Dairy Industries*.

(b) Similarly, the mere fact that the trade mark applicant knew that another party used the trade mark in the UK does not establish bad faith: *Lindt, Koton* (paragraph 55). The trade mark applicant may have reasonably believed that it was entitled to apply to register the mark, e.g. where there had been honest concurrent use of the marks: *Hotel Cipriani*.

(c) However, an application to register a mark is likely to have been filed in bad faith where the trade mark applicant knew that a third party used the mark in the UK, or had reason to believe that it may wish to do so in future, and intended to use the trade mark registration to extract payment/consideration from the third party, e.g. to lever a UK licence from an overseas trader: *Daawat*, or to gain an unfair advantage by exploiting the reputation of a well-known name: *Trump International Limited*.

(d) An application may also have been filed in bad faith where the trade mark applicant acted in breach of a general duty of trust as regards the interests of another party, including his or her own (ex) company or (ex) partners, or a party with whom there is, or had recently been, a contractual or pre-contractual relationship, such as a licensor, prospective licensor or overseas principal: *Saxon, Mouldpro*; or where a legal agreement prohibits such a filing.

22. The correct approach to ascertain what the registered proprietor knew when filing the application for the contested mark was set out in *Alexander Trade Mark*, BL O/036/18, the key questions for determination in a claim of bad faith are:

(a) What, in concrete terms, was the objective that the applicant has been accused of pursuing?

(b) Was that an objective for the purposes of which the contested application could not be properly filed? and

(c) Was it established that the contested application was filed in pursuit of that objective?

23. An allegation of bad faith is a serious allegation which must be distinctly proved, but in deciding whether it has been proved, the usual civil evidence standard applies (i.e. balance of probability). This means that it is not enough to establish facts which are as consistent with good faith as bad faith: *Red Bull*.
24. It is necessary to ascertain what the original proprietor knew at the relevant date.² Evidence about subsequent events may be relevant, if it casts light backwards on the position at the relevant date.³

Assessment

25. The relevant date for establishing bad faith is 10 December 2021, the date on which the contested application was filed. The applicant makes a number of contentions against the original proprietor as well as the registered proprietor.
26. In summary, it appears that the applicant's case is pleaded based on the following allegations: 1) the original proprietor must have had knowledge of the applicant and its successful business endeavours in China at the filing date of the contested application; 2) the contested application was filed without a bona fide intention to use the mark in relation to any of the goods covered by the application; 3) the contested application was an instrument of fraud, or a blocking strategy, intended to disrupt the applicant's trade activity by blocking its entry into the UK market; 4) the mark was registered for the purpose of obtaining leverage against the applicant in an attempt to extort financial gain through the sale or licensing

² *Red Bull GmbH v Sun Mark Limited and Sea Air & Land Forwarding Limited* [2012] EWHC 1929 (Ch).

³ *Hotel Cipriani SRL and others v Cipriani (Grosvenor Street) Limited and others*, [2009] RPC 9 (approved by the Court of Appeal in England and Wales: [2010] RPC 16)

of the mark; 5) the registered mark adversely affects the applicant's reputation and undermines its potential UK distribution network, while enabling the registered proprietor to unjustly assume the role of the authorised or exclusive distributor of QJMOTOR products in the UK. In addition, the applicant raises doubts regarding the registered proprietor's capacity to produce the registered goods.

27. I consider the above allegations are interlinked and could be the basis of a bad faith objection, if proven, following the case law summarised above. The registered proprietor is not required to provide a positive case of good faith unless and until the applicant has presented evidence from which "a rebuttable presumption of lack of good faith" can be drawn. I will, therefore, start by examining whether the applicant has provided such evidence.
28. I remind myself that the concept of bad faith presupposes the existence of a dishonest state of mind or intention, but dishonesty is to be understood in the context of trade mark law. I also take account of the concept of bad faith, which, so understood, relates to a subjective motivation on the part of the trade mark applicant, namely a dishonest intention or other sinister motive. It involves conduct which departs from accepted standards of ethical behaviour or honest commercial and business practices.
29. As noted above, applying to register a trade mark without an intention to use it is not bad faith per se.⁴ I also bear in mind the rationale in *Sky*⁵ where the CJEU stated that:

"77. [...] Such bad faith may, however, be established only if there is objective, relevant and consistent indicia tending to show that, when the application for a trade mark was filed, the trade mark applicant had the intention either of undermining, in a manner inconsistent with honest practices, the interests of third parties, or of obtaining, without

⁴ See *Skykick*.

⁵ *Sky v Skykick*, CJEU, Case C-371/18, EU:C:2020:45.

even targeting a specific third party, an exclusive right for purposes other than those falling within the functions of a trade mark.”

The mere fact that the contested application was made by a foreign company associated with a law firm (Exhibit QJ1), acting as the representative of the original proprietor in these proceedings, does not establish that the original proprietor did not have a bona fide intention to use the contested mark. On this point, I note that the applicant for a mark is not required to know precisely the use it will make of the mark applied for at the relevant date. The applicant also has a period of five years for beginning actual use consistent with the essential function of a trade mark. Even when considering the Appointed Person’s comments provided in Exhibit QJ6, they are not adequate to support that the application was made in bad faith. I also note that the subject matter of that appeal concerns a different trade mark application not related to these proceedings, and I remind myself that each case is decided on its own facts and evidence.

30. Further, in its submissions, the applicant argued that “a bona fide intention to use cannot be provided by making an application in the name of an entity with the intention of later assigning that application to another entity to use.” I do not consider the assignment of a mark per se as an unusual practice or inconsistent with the functions of a trade mark; on the contrary, it is permitted under Section 24 of the Act. The evidence fails to establish why the assignment of the contested mark (from the original proprietor to the registered proprietor in question) goes against the bona fide intention to use the mark. On the basis of the evidence before me, it is insufficient to find that the original proprietor did not have a bona fide intention to use the contested mark.
31. In addition, I do not consider the registered proprietor’s status as an individual or their capacity to manufacture such goods as being relevant. This is because the particular issue I have to decide is whether the contested application for a UK trade mark was made in bad faith, rather

than the circumstances surrounding the assignee – registered proprietor – in this case. Also, there is nothing before me to suggest that the registered proprietor does not have any intention to use the contested mark. Thus, I consider that the evidence does not conclusively demonstrate that the filing of the contested application was made without a bona fide intention to use the mark.

32. Moreover, the fact that the original proprietor may have known that a third party is using a mark in another territory at the time of filing its application, is not sufficient, in itself, to permit the conclusion that the applicant is acting in bad faith.⁶ There must be something else involved before this can justify a finding of bad faith. In the present case, Mr Wang, in his witness statement, provides an overview of the applicant's business activities, including information regarding the manufacturing and exportation of its goods in various countries, including the UK. I have also considered the evidence put forward by the applicant to support its case that the original proprietor knew about its mark, by way of the applicant's trade mark filing activities (Exhibit QJ4), website (Exhibit QJ2), for which there are no usage statistics), and online articles published on UK websites (Exhibit QJ3). However, there is no actual acknowledgement or admission from the original proprietor that it was aware of the applicant's use of the mark, albeit this is clearly not determinative. I also note there is no evidence of any correspondence between the parties on the subject, and none of the evidence filed by the applicant actually confirms the original proprietor's knowledge of the applicant's use in concrete terms or even that it is reasonable for me to infer that the applicant had such knowledge. Therefore, it appears to me that the applicant is making assumptions about the original proprietor's knowledge, rather than presenting a factual basis for its claims.

⁶ *Malaysia Dairy Industries Pte Ltd v Ankenævnet for Patenter og Varemærker* Case C-320/12.

33. In relation to the applicant's intention to expand within the UK is not borne out by the evidence. Although it is clear from Mr Wang's witness statement that the applicant is known in China, the evidence provided in these proceedings shows only a limited trading presence in the UK. Whilst there is narrative evidence of sales in the UK through the export of goods and the online articles provided with Exhibit QJ3, there is no evidence of any definitive plans of the applicant to enter the UK market. Notably, given the significance of the motorcycle industry, the sales figures for 2021 are negligible to establish a meaningful presence in the UK market. Additionally, the two online articles in Exhibit QJ3 do not indicate that the applicant's next step was to expand in the UK or that this expansion was imminent. On the contrary, one of the articles mentions that:

“At the moment QJMotor's international plans are unclear. The firm is establishing itself as a high-end leader in China, aiming to break preconceptions of poor quality and low specifications by relying heavily on European components including Brembo brakes and Marzocchi suspension. Its bikes largely share Benelli platforms, which means they are designed to meet international regulations, so there appears to be little standing in the way of the firm as far as when it decides to start selling models outside the Chinese market.”

Even if the applicant had an intention, at the relevant date, to enter the UK market in the future, it remains unclear, on the balance of probabilities, whether the original proprietor of the contested mark would have been aware of this intention as of the relevant date. Thus, it has not been established with any certainty that the original proprietor would have had any knowledge of the applicant's intentions to expand into the UK market.

34. The applicant also adduced with its evidence a list of trade mark applications filed in other countries by the original proprietor of the contested mark (Exhibit QJ5). In relation to this point, I am not satisfied that relying on unrelated trade mark applications/registrations in another jurisdiction is evidence of an application made in bad faith, whether the

party was successful in filing these marks or not. The applicant has filed no evidence to persuade me that these filings indicate the applicant is engaging in unacceptable commercial behaviour.

35. The applicant also pleads that the contested application was filed with the intention to harm/damage its reputation by gaining an unfair advantage through the exploitation of the reputation of a well-known name. However, I am not satisfied that the applicant has demonstrated that its unregistered right would be well-known across the UK. Even if it were, I see nothing in the evidence that points to the original proprietor attempting to exploit the applicant's well-known name. In addition, although the applicant claimed in its submissions that the QJMOTOR brand would be known to Chinese nationals, no supporting evidence has been provided to substantiate this claim. On balance, such a claim has not been proven.
36. Lastly, Mr Evans stated in his witness statement that it is extremely common that Chinese brand owners face fraudulent overseas registration of their marks by third parties, often using shell companies or relatives' identities, aiming to extort payment for assigning or transferring such marks. Nevertheless, no supporting evidence, such as figures, has been presented to establish a connection between these alleged practices and the case at hand. This appears to be more of a supposition, and thus it does not sufficiently demonstrate that the application was made in bad faith.
37. I do not consider that the applicant has gone far enough to successfully demonstrate a prima facie case of bad faith against the contested application. I find that there is not sufficient evidence to suggest that, at the relevant date, that the original proprietor was acting in a commercially unacceptable or dishonest way by applying for the mark in issue or there was any pattern of behaviour that would allow a finding of blocking strategy against the applicant.

Outcome

38. The application for invalidity based upon Section 3(6) of the Act is unsuccessful.

Costs

39. The registered proprietor has been successful and is entitled to a contribution towards the costs of the proceedings. Awards of costs are governed by Annex A of Tribunal Practice Notice (TPN) 1/2023. I award costs to the registered proprietor on the following basis:

Filing counterstatement and considering the application for invalidity	£250
Total	£250

40. I, therefore, order Zhejiang Qianjiang Motorcycle Co., Ltd. to pay to Maria Eugenia Lopez the sum of £250. 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 25th day of November 2024

Dr Stylianos Alexandridis
For the Registrar,
The Comptroller General