

DISPUTE RESOLUTION SERVICE

D00016067

Decision of Independent Expert

VDA Verband der Automobilindustrie e.V.

and

KEE Automotive Ltd

1. The Parties:

Lead Complainant: VDA Verband der Automobilindustrie e.V.
Behrenstr. 35 10117
Berlin
Germany

Respondent: KEE Automotive Ltd
Toad Hall
Roxwell
Chelmsford
Essex
CM1 4LS
United Kingdom

2. The Domain Name(s):

ad-blueoff.co.uk
adblueoff.co.uk

3. Procedural History:

I can confirm that I am independent of each of the parties. To the best of my knowledge and belief, there are no facts or circumstances, past or present, or that could arise in the foreseeable future, that need be disclosed as they might be of a such a nature as to call in to question my independence in the eyes of one or both of the parties.

11 June 2015 16:16 Dispute received
12 June 2015 11:58 Complaint validated
16 June 2015 10:35 Notification of complaint sent to parties
25 June 2015 17:18 Response received
25 June 2015 17:18 Notification of response sent to parties
30 June 2015 02:30 Reply reminder sent
02 July 2015 12:50 Reply received
03 July 2015 11:10 Notification of reply sent to parties
03 July 2015 11:10 Mediator appointed
08 July 2015 11:29 Mediation started
28 July 2015 11:57 Mediation failed
28 July 2015 11:58 Close of mediation documents sent
03 August 2015 17:12 Expert decision payment received
07 August 2015 Keith Gymer appointed as Expert

4. Factual Background

The Complainant is VDA Verband der Automobilindustrie e.V. – the German Automotive Industry Association. It is an umbrella organisation which provides services to support the interests of the German automotive industry in sectors such as aftermarket, electric mobility, logistics and customs and excise.

The Complainant is the owner of trade mark registrations internationally for its ADBLUE¹ marks, including *inter alia* Community Trade Marks (CTM) 3945938 for ADBLUE dating from 2004 and CTM 1042880 dating from 2010. AdBlue® is used particularly as a trade mark for a 32.5% solution of urea in deionised water (Urea AUS 32), which is required by many diesel vehicles for the correct operation of an exhaust pollution control technology known as Selective Catalytic Reduction or SCR. The AdBlue trade mark is licensed by the Complainant for use in this connection by car manufacturers and suppliers in the chemical industry.

Commercial vehicles fitted with SCR may have electronic Engine Control Units (ECU), which may prevent the engine running at full power if the SCR system does not have an adequate supply of Urea AUS 32. There is therefore an aftermarket in customised control units, which are designed to override or delete the SCR control systems. These may also be referred to as Diesel Exhaust Fluid (DEF) removal services.

¹ The parties referred to ADBLUE in various forms (e.g. AdBlue, Adblue, adblue, etc.). The Expert has generally retained their respective usages in the summaries of their submissions, and has otherwise used the form "AdBlue".

The Respondent, KEE Automotive Ltd, is a supplier of such technology to allow vehicles to be operated by disabling the SCR and effectively removing the requirement for the vehicle to have a supply of Urea AUS32. The Respondent offers such products via websites using the disputed domain names, adblueoff.co.uk and ad-blueoff.co.uk. According to the Nominet WhoIs register, the domain name adblueoff.co.uk was registered by the Respondent on 26 March, 2013 and the domain name ad-blueoff.co.uk on 14 October, 2014

5. Parties' Contentions

Complainant

The Complainant explains that requirements for reduction of pollutant emissions in the EU are increasing and SCR-systems are used in combination with its "AdBlue" urea solution to lead to a reduction of Nitrous Oxide (Nox) emissions. For vehicles using SCR systems, it is important that there is always a sufficient amount of urea solution in the SCR tank, or there is a risk of damage to the SCR-equipment leading to the vehicle failing to comply with the legal requirements for exhaust emissions. The purity of the urea solution required is regulated in ISO standards 22241-1 to 4. For its "AdBlue" urea solution the Complainant's licensees have to undergo a quality audit performed by VDA-QMC at their production site to ensure compliance with these standards.

Complainant's Rights

The Complainant has registered its ADBLUE trademarks in over 40 countries around the world. A list was provided with the Complaint, with Annexes including current OHIM register details for CTMs 3945938 and 1042880, as noted above. Licensees in the UK include Advanced Emission Solutions Ltd, Landowner Products Ltd and Shell International Ltd, and a large number of licensees based in other countries, including, BASF SE, Fiat Group Automobiles SpA and General Motors Holdings LLC have worldwide licences which allow them to use the trade mark "AdBlue" in the UK. The trade mark "AdBlue" is used on vehicles, car-parts and in car-manuals. On diesel vehicles equipped with SCR Technology there is a separate tank for "AdBlue" urea solution for which the filler cap is labelled with the trade mark "AdBlue" and is located either in the trunk of a vehicle or directly next to the fuel filler cap. "AdBlue" urea solution is already available at filling stations and dealers all over Europe.

The Complainant also claims common law rights, in addition to its registered rights, on the grounds that "AdBlue" has acquired extensive goodwill and a substantial reputation throughout the UK, the EU and the world. For example, it provides copies of some third party articles and cites market data from Integer Research Ltd indicating that the share of Medium Duty and Heavy Duty truck fleets equipped with SCR is 30-35%, with annual "AdBlue" urea solution

consumption in the UK and Ireland alone in 2013 estimated at 270,000 tonnes (which is 248 Million Litres) and in 2014 estimated at 285,000 tonnes.

The Complainant argues that the dominant and distinctive element in the case of each of the disputed domain names is “adblue” (or “ad-blue”), which is essentially identical to the Complainant’s “AdBlue” trade mark. The addition of the hyphen in the domain name ad-blueoff.co.uk does not alter the distinctive character of the “AdBlue” trade mark in the domain name and is likely to go unnoticed by an average consumer. Consequently the dominant and distinctive element of this domain name is also the trade mark “AdBlue”. The remainder of each domain name is the word “off” which is a non-distinctive term, which does not detract from “AdBlue” as the dominant element of each domain. The disputed domain names are therefore each closely similar to a name in which the Complainant has rights.

Abusive Registration

The Complainant submits that, pursuant to Paragraph 3(a)(ii) of the DRS Policy, the Respondent is using the disputed domain names in a way which is likely to confuse people or businesses into believing that the domain names are registered to, operated or authorised by or otherwise connected to the Complainant.

It alleges that members of the public will be confused as to the identity of the proprietor of the domain names because the “AdBlue” trade mark is the only dominant and distinctive element in the domain names.

The addition of “off” in the domain names may allude to Diesel Exhaust Fluid (DEF) removal services which may remove the requirement for “AdBlue” urea solution in vehicles. However, the use of “AdBlueoff” cannot be considered as descriptive/generic use as the proper description would be ‘DEF removal’ or ‘urea AUS 32 removal’.

Furthermore, the domains are in use in relation to a website which promotes DEF removal services by the Respondent, as well as the sale and supply of “AdBlue” urea solution. DEF removal services are not recommended, and are certainly not advocated by the Complainant as this means the vehicle in question will no longer comply with the legal requirements for exhaust emissions.

The Respondent’s use of the Trade Mark “AdBlue” in the domain names without any clear indication or dissociation from the Complainant or its authorised licensees will clearly imply to members of the public that the domain names and any connected websites are either registered to, operated or authorised by or otherwise connected with the Complainant or its authorised licensees, when that is not the case.

Consequently, the use of the Complainant’s trade mark “AdBlue” in the domain names, in connection with a website promoting such services, is detrimental to the Complainant’s reputation, as consumers may think the same is authorised by

the Complainant or its licensees and consequently may believe that the Complainant endorses such services and non-compliance with legal regulations. For consumers to have such beliefs about the Complainant would be seriously damaging to its reputation as an automotive association/body representing the automotive industry and is damaging to the reputation in the “AdBlue” trade mark.

The Complainant also provided brief details of correspondence from October 2014 to April 2015 between its legal representatives and the Respondent regarding the Complainant’s request for cancellation of the domain names and cessation of all use of the trade mark “AdBlue” in promotional materials for the Respondent’s business. It noted the Respondent’s refusal to comply.

Remedy

The Complainant requests the cancellation of the disputed domain names.

Respondent

The Respondent claims expertise in various fields, including automotive electrical systems, powertrain performance tuning and economy calibration services, and to have developed DEF removal systems to allow vehicles to satisfactorily be operated without the use of exhaust additive fluid.

It says this fluid is known by various names around the world with AdBlue being the most common in Europe. It asserts that AdBlue seems to be slowly replacing all other references around the world and by default is becoming the “generic” term used to describe all such exhaust fluids, regardless of whether the actual fluid is supplied by the Complainant or its licensees or not.

The Respondent admits that it markets and sells its “AdBlue” removal technology using the website www.adblueoff.co.uk and, to account for the different spelling used, also via www.ad-blueoff.co.uk. It claims to have selected the name “adblueoff” for two reasons:

- a – adblue is becoming the generic term for all such fluids and as such the majority of customers would use this as a search term
- b – adding the word “off” both to indicate that its systems allow removal of DEF systems and also to differentiate itself from the Complainant to help prevent any possible confusion by prospective customers of either party.

The Respondent acknowledges that the Complainant has the trade mark “AdBlue” (but that it has apparently not registered the trademark “ad-blue”), and points out that it does not have registrations for “adblueoff” or “ad-blueoff”. The addition of the term “off” makes a different word string, which is not the same as “AdBlue” alone. It asserts that both “adblueoff” and “ad-blueoff” would therefore be valid new trademarks that could be registered.

The Respondent denies that there could be any infringement of the Complainant's rights, arguing that it does not offer identical or similar goods or services to the Complainant, and so a customer is not likely to be confused as to origin of the goods and services; and the Respondent does not gain any unfair advantage from the Complainant's trade mark, or associate itself in any way with the Complainant and neither does it exploit any goodwill associated therewith. Its business is not detrimental to the distinctive character of the trade mark and so no infringement can have occurred.

Furthermore the Respondent says that the inclusion of the following acknowledgement and disclaimer on its website makes it clear that the trademark "Adblue" is owned by the Complainant and that the Respondent is in no way connected to or approved by the Complainant:

Trademark Acknowledgement

The word "AdBlue" is a registered trademark of the VDA but it is also one of the most commonly used words in Europe to describe all such fluids and systems. Outside of Europe it is also known as DEF (USA), ARLA32 (Brazil), SCR fluid or its technical name AUS32.

Adblue is a registered trademark of the VDA Verband der Automobilindustrie, a German association of the automotive industry.

We use the word Adblue on this website purely for descriptive purposes.

Any references to Adblue and other trademarks/images/logos are used purely for illustrative purposes only.

None of the manufactures or trademark owners support or endorse our services.

It will therefore be immediately obvious to any customers that both the Respondent's websites have no connection whatsoever with the Complainant or the Complainant's website, which is clearly different.

To further differentiate the Respondent notes that it also uses the terms "NoBlue-Ad Blue/DEF/ARLA32/SCR/UREA-Removal and Delete" rather than relying on the single word Adblue on its websites.

It alleges that, with the exception of vehicle manufacturers and fuel distributors, the average customer does not even realise the term "Adblue" is trademarked and is less likely to know it is connected to the Complainant, and so uses the word "Adblue" as a generic term. It says the terms "DEF removal" or "Urea removal" would mean nothing to the average UK or European customer, and that being a UK based company the only sensible way to refer to this fluid in these markets is to use the term "Adblue", hence the Respondent uses "adblueoff". Thus it claims "Adblueoff" is likewise a generic descriptive term, as it implies removal or deletion of the exhaust fluid.

The same arguments made in defence of "adblueoff" are also said to apply correspondingly to "ad-blueoff", as the Respondent says it simply includes this alternative spelling as some customers believe this is the correct way to search for anything related to exhaust fluid. Nonetheless, the addition of the hyphen is argued to further differentiate the term from the Complainant's trade mark. The Respondent even claims to be commonly known by its websites adblueoff.co.uk and ad-blueoff.co.uk.

The Respondent admits that “Adblue” removal services are not recommended by the Complainant, but says this is made perfectly clear on its web pages; that it is legal to market, sell or supply any such removal device either in the UK or the rest of the world; and that it recommends customers check local laws to see if it is allowed to use “Adblue” removal systems on vehicles in their territory. It concludes that the Complaint should be rejected.

Complainant’s Reply

The Complainant submitted a Reply to the Respondent’s claims in the Response, which is summarised below.

The Respondent’s assertion that “Adblue” is becoming the ‘generic’ term used to describe SCR exhaust fluids is not supported by any evidence. The Complainant annexed a list of DEF manufacturers illustrating various different brand names used for the same product.

The Respondent’s claim that the majority of customers would use “AdBlue” as a search term on the internet when looking for information on all exhaust fluids only serves to confirm that the Respondent has chosen to use the trade mark “AdBlue” in the contested domain names due to its reputation. This is done to obtain business by taking unfair advantage of the recognition of the “AdBlue” trade mark, and will also cause dilution and confusion.

The fact that a search of the UK IPO trade mark database for the term “adblueoff” may not find any results does not mean that it would not be subject to objections. The Complainant would contend that the trade mark “AdBlue” would be located in a full clearance search for the mark “adblueoff”.

The Complainant does not accept that the inclusion of a trade mark acknowledgement/disclaimer on the Respondent’s websites is sufficient to ensure that no confusion could arise with the Complainant’s rights. Not all consumers will read the disclaimer. They would not expect a company using the trade mark “AdBlue” in their domain name not to be associated with the Complainant or one of the Complainant’s licensees.

Furthermore, the use of a disclaimer is irrelevant to the fact that the trade mark “AdBlue” is being used in the contested domain names; the statement “None of the manufactures [*sic*] or trademark owners support or endorse our services” is right at the end of the disclaimer, which is six lines and two paragraphs long, and could easily be missed by a consumer; and the claim that “AdBlue” is a registered trade mark, but that “it is also one of the most commonly used words in Europe to describe all such fluids and systems” suggests to a consumer that the trade mark is a generic term, which undermines the fact there is a disclaimer on the website at all.

The statement that “Outside of Europe it [AdBlue] is also known as DEF (USA), ARLA32 (Brazil), SCR fluid or its technical name AUS32”, is misleading as such terms are also the generic name for the “AdBlue” branded urea solution in the UK and EU.

The Respondent’s disclaimer advises “We use the word Adblue on this website purely for descriptive purposes” and “Any references to Adblue and other trademarks/images/logos are used purely for illustrative purposes only”. Such statements are incorrect as use of the “AdBlue” trade mark in the domain names adblueoff.co.uk and ad-blueoff.co.uk is not descriptive use, and is not purely for illustrative purposes.

There is no evidence to support the Respondent’s claim that “very few people, even “industry qualified” people outside of Germany appear to know who or what this organisation [the Complainant] is”.

The Respondent makes reference to the defences under section 4a(1)(a) and (b) of the Nominet DRS Policy claiming that “we have used this domain for over 2 years actively publishing and marketing and carrying out own business” and “we are commonly known by our website adblueoff.co.uk and ad-blueoff.co.uk”. The Complainant contends that this is not a defence to the domains being “Abusive Registrations” under the DRS Policy. To utilise these defences, the Respondent would need to show he was commonly known by the names “adblueoff” and “ad-blueoff” prior to being aware of the Complainant’s rights in the trade mark “AdBlue” or that he had been carrying on business under the names prior to being aware of the Complainant’s rights in the trade mark “AdBlue”. It has not done so.

6. Discussions and Findings

General

Paragraph 2 of the Policy requires that, for the Complainant to succeed, it must prove to the Expert, on the balance of probabilities, both that it has Rights in respect of a name or mark which is identical or similar to the Domain Name; and that the Domain Name, in the hands of the Respondent, is an Abusive Registration as defined in Paragraph 1 of the Policy.

Complainant’s Rights

The Complainant has asserted claims to registered and common-law rights in “AdBlue” as a trade mark. It has provided evidence of current register details at least for CTM 1042880. The Respondent has also itself admitted that the Complainant has such registered trade mark rights.

Apart from the common domain suffices .co.uk, the disputed domain names “adblueoff.co.uk” and “ad-blueoff.co.uk” differ from the Complainant’s trade

mark only by the addition of the word “off” in both cases, and by the addition of a hyphen separating “ad-blue” in the second.

By the Respondent’s own admission, the domain names were both constructed from a combination of “Adblue” – as allegedly the most commonly used term to describe DEF urea AUS 32 – and “off” specifically to indicate removal of DEF system controls, and that “Ad-blue” was adopted simply as an alternative spelling commonly searched by customers. The Expert is in no doubt that both domain names would be read as Ad-blue-off dot co dot uk, and that any consumer familiar with the “AdBlue” trade mark would most certainly associate the domain names with that mark. Indeed, it is, of course, the Respondent’s acknowledged intention that they should do so.

Consequently, the Expert finds that the Complainant has Rights in respect of a name or mark, which is identical or similar to each of the disputed domain names, so that the conditions of Paragraph 2a.i. of the Policy are met.

Abusive Registration

The Complainant also has to show that a disputed Domain Name is an Abusive Registration. Paragraph 1 of the Policy defines “Abusive Registration” as a Domain Name which either:

- (i) was registered or otherwise acquired in a manner which, at the time when the registration or acquisition took place, took unfair advantage of or was unfairly detrimental to the Complainant’s Rights; OR
- (ii) has been used in a manner, which took unfair advantage of or was unfairly detrimental to the Complainant’s Rights.

A non-exhaustive list of factors which may be evidence that a Domain Name is an Abusive Registration are set out in Paragraph 3a of the Policy.

From the Complainant’s submissions, the following examples are claimed to be potentially applicable in this case:

- 3a.i. Circumstances indicating that the Respondent has registered or otherwise acquired the Domain Name primarily:
 - ...
 - C. for the purpose of unfairly disrupting the business of the Complainant;
- ii. Circumstances indicating that the Respondent is using or threatening to use the Domain Name in a way which has confused or is likely to confuse people or businesses into believing that the Domain Name is registered to, operated or authorised by, or otherwise connected with the Complainant;

Paragraph 4 of the Policy additionally provides observations on “How the Respondent may demonstrate in its response that the Domain Name is not an Abusive Registration”, of which the following may be considered pertinent to the present Complaint:

4.a.i. Before being aware of the Complainant's cause for complaint (not necessarily the 'complaint' under the DRS), the Respondent has:
A. used or made demonstrable preparations to use the Domain Name or a domain name which is similar to the Domain Name in connection with a genuine offering of goods or services;
B. been commonly known by the name or legitimately connected with a mark which is identical or similar to the Domain Name;

4a.ii The Domain Name is generic or descriptive and the Respondent is making fair use of it.

The factors listed in Paragraphs 3 and 4 of the Policy are only intended to be exemplary and indicative. They are not definitive either way. It is Paragraph 1 of the Policy, which provides the applicable definition as indicated above.

In accordance with the Policy Paragraph 2b, it is for the Complainant to prove, on the balance of probabilities, that the Domain Name is an Abusive Registration.

The Respondent's principal defence for incorporating the Complainant's "AdBlue" trade mark into the disputed domain names is pithily summarised by the Respondent itself in its own reasons for doing so, in the allegation that "adblue is becoming the generic term for all such fluids and as such the majority of customers would use this as a search term".

As the Complainant has pointed out, no evidence has been provided to support this contention. Neither the Respondent nor any other party appears to have taken any action to cancel the Complainant's trade mark registrations anywhere on such grounds. The fact that "AdBlue" may be used informally by consumers as a shorthand for DEF and in connection with SCR systems does not mean that they do not recognise it as a trade mark. "AdBlue" DEF is evidently a very commonly used and familiar product in its field, and truck manufacturers have been licensed to use the "AdBlue" trade mark on the SCR systems in their vehicles and the DEF tank may itself be labelled for "AdBlue", so that it would be no surprise for drivers to refer to filling their "AdBlue" tank, for example, even if they were using another brand of DEF.

It is noteworthy that the Respondent also refers to customers using the "AdBlue" mark "as a search term". The majority of internet users wanting to look for information on "AdBlue" might well lazily say "I'll just Google "AdBlue" then", regardless of whether or not "Google" is the search engine actually installed in their browser. But they would be well aware that "Google" itself is a proprietary brand. That it happens to be the most popular search engine in many countries, and that everyone understands what is meant when someone says they will "Google" something, would not disentitle Google from asserting its trade mark rights against unauthorised commercial use of its mark.

And, in the Expert's view, that is exactly the situation in the present dispute.

The Respondent is hoist on its own petard. It has expressly admitted that it knew full well that “AdBlue” is a proprietary brand name and that the disputed domain names were intentionally formed to incorporate that mark, with the addition of the word “off” only to imply disabling of SCR systems. It admits that the variation “ad-blue” was adopted again because it claims customers also commonly use this variation in search engines. The insertion of hyphens into domain names simply to split brand names into recognisable syllables or prefixes and suffixes is also, of course, a familiar practice adopted by cybersquatters and typosquatters to pick up similar search variations. The “AdBlue” mark remains clearly recognisable, and the Expert certainly does not accept the Respondent’s contention that the hyphen provides any significant differentiation.

There are analogies with the situation in DRS07991 toshiba-laptop-battery.co.uk, where the Appeal Panel in that case summarised the principles to be applied as follows:

1. It is not automatically unfair for a reseller to incorporate a trade mark into a domain name and the question of abusive registration will depend on the facts of each particular case;
2. A registration will be abusive if the effect of the respondent’s use of the domain name is falsely to imply a commercial connection with the complainant;
3. Such an implication may be as a result of “initial interest confusion” and is not dictated only by the contents of the website;
4. Whether or not a commercial connection is implied, there may be other reasons why the reseller’s incorporation of the domain name was unfair. One such reason is the offering of competitive goods on the respondent’s website”.

In the present Expert’s view, the structure of the disputed domain names, with the Complainant’s trade mark presented first, has the familiar appearance of a trade mark use. The first presumption which is going to be conveyed to most ordinary internet users when these domain names are connected to a website, or used in an email address, is that they are operated or authorised by the Complainant in connection with its “AdBlue” trade mark and products.

The Respondent asserts that the purported trademark acknowledgement and disclaimer on its website make it obvious that there is no connection with the Complainant. However, the acknowledgement and disclaimer are presented in small text found by scrolling down on the Respondent’s website, and might be characterised as somewhat grudging, misleading and disingenuous at best. The assertion in the “acknowledgement” that the “AdBlue” trade mark “is also one of the most commonly used words in Europe to describe all such fluids and systems” (i.e. DEF), conveys the Respondent’s casual indifference to the validity of the Complainant’s trade mark.

Most references to “AdBlue” on the website will inevitably be read by ordinary consumers as being to the trademarked products and systems. The assertions that “We use the word Adblue on this website purely for descriptive purposes” and “Any references to Adblue and other trademarks/images/logos are used purely for illustrative purposes only” are plainly not accurate, but all must raise doubts as to whether the “Ad Blue Sales”, also offered by the Respondent on its website, are then to be taken as referring to substitute DEF products as well.

The Respondent has admitted the domain names were chosen specifically with regard to the public recognition of the Complainant’s “AdBlue” trade mark. The Respondent asserts that this is simply a descriptive use for the purpose of identifying the nature of its own products offered on the website. The Expert does not agree. The aim was clearly to take advantage of the reputation and recognition of the Complainant’s mark to attract customers to the Respondent’s products, which are actually directed at disabling SCR systems and removing the need for vehicles to use DEF products like the Complainant’s “AdBlue” fluid. It is difficult to see how that could be anything other than unfairly detrimental to the Complainant’s rights.

The Respondent also sought to claim the benefit of other potential factors which might apply in defences under Paragraphs 4.a.i.A & B, that

- Before being aware of the Complainant's cause for complaint (not necessarily the 'complaint' under the DRS), the Respondent has:
 - A. used or made demonstrable preparations to use the Domain Name or a domain name which is similar to the Domain Name in connection with a genuine offering of goods or services;
 - B. been commonly known by the name or legitimately connected with a mark which is identical or similar to the Domain Name;

As the Complainant pointed out, these possible factors for consideration are directed at situations where a Respondent is innocently unaware of a Complainant’s earlier rights, which is certainly not the case here.

In any event, as noted above, the factors listed in Paragraph 4 of the Policy are not definitive either way. It is Paragraph 1 of the Policy, which provides the applicable definition of an Abusive Registration as indicated above.

In the present case, the Expert is satisfied that the Complainant has justified its Complaint on the balance of probabilities and that the registration and use of the disputed domain names by the Respondent has taken unfair advantage of, and been unfairly detrimental to, the Complainant’s Rights.

For the purposes of the Policy the Expert therefore finds that the conditions of Paragraph 2a.ii. of the Policy are met.

7. Decision

Having found that the Complainant has Rights, and that each of the disputed domain names, adblueoff.co.uk and ad-blueoff.co.uk, is an Abusive Registration in the hands of the Respondent, the Expert orders that the disputed domain names should each be cancelled as requested by the Complainant.

Signed **Dated 21 August, 2015**
Keith Gymer