Victorian Plumbing Ltd
1 Sustainability Way
Farington Moss,
Leyland,
PR26 6TB

info@victorianplumbing.co.uk

FAO: The Directors
The Home Delivery Guys

2 November 2026

BY EMAIL

Dear Directors

TRADE MARK INFRINGEMENT

We are writing to you about the activities and actions of you, The Home Delivery Guys **(THDG)**, which amount to an infringement of our intellectual property rights.

This is a Letter of Claim pursuant to the Pre-Action Protocol **(Protocol)**. The Protocol can be viewed online at: https://www.justice.gov.uk/courts/procedure-rules/civil/rules/pd_pre-action_conduct.

This matter is urgent and serious. This is a complicated area of law and we suggest you take specialist legal advice immediately.

Victorian Plumbing Ltd **(Victorian Plumbing)**

1. Victorian Plumbing is the UK's leading bathroom retailer.

2. We have traded continuously under the name 'Victorian Plumbing' since 1999 in the UK and have established a strong brand and excellent reputation amongst trade and retail customers.

3. We are predominantly an online retailer, trading extensively online through a site hosted at the domain name https://www.victorianplumbing.co.uk/ **(Site)**. We have traded from the Site since 2001.

Marketing

4. As part of our brand strategy, we have invested heavily in online and in print advertising. We have run a dedicated campaign of TV advertising since September 2014. Victorian Plumbing's adverts have appeared on various channels including ITV, Channel 4, Channel 5, Sky1, E4 and More4 reaching an estimated 25 million homes in the UK.

5. Our annual advertising and marketing expenditure has increased from c.£1m in 2012 to c.£89m in 2026. As a result of these activities, we have built up substantial goodwill and

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reputation in the bathroom retail sector. We are the UK's leading bathroom retailer.

Trade marks

6. We are the registered proprietor of a number of UK trade marks. This includes the Victorian Plumbing name, registered under trade mark number UK00003114054 (**Name**), and the Victorian Plumbing logo, registered under trade mark number UK00004372461 (**Logo**). Together, the Name and Logo are referred to in this letter as the **Marks**. The Marks are registered for the purposes of the Trade Marks Act 1994 (**TMA**).

7. The Name is registered in the following classes:

   Class 11: Apparatus for heating, steam generating, ventilating, water supply and sanitary purposes; bath, basin, sink and shower installations; basins, baths, bidets, sinks, spa baths, whirlpools, bath panels and screens, showers, shower controls, shower cubicles, shower enclosures, shower stalls, shower trays and cases, shower panels and screens, shower spray heads, brackets for supporting shower spray heads, shower mixing valves; taps, mixers and faucets; radiators; valves, radiator valves, isolating valves; pipes, hoses and connectors; heaters, space heaters, water heaters, shower heaters, towel heaters, heated towel rails, heated towel rail accessories immersion heaters; water tanks, lids for water tanks; fans, extractor fans; toilets, toilet suites, toilet bowls; cisterns; regulating and safety apparatus for water or gas apparatus and pipes; vanity units; parts and fittings for the aforesaid goods.

   Class 20: Furniture, mirrors, picture frames; furniture for bathrooms; separate units, combination units; non-metallic wall plugs; mirrored tiles; non-metallic towel hooks and rails; shower curtain rails; parts and fittings for the aforesaid goods.

   Class 21: Toilet utensils and containers; shower tidies, soap and sponge dishes and baskets; tooth brush, mug and tumbler holders; towel rails; towel rings; toilet brushes and brush holders; toilet roll holders; waste bins; pedal waste bins; bath racks; parts and fittings for the aforesaid goods.

   Class 35: The bringing together, for the benefit of others, apparatus for lighting, heating, steam generating, ventilating, water supply and sanitary purposes, bath, basin, sink and shower installations, basins, baths, bidets, sinks, spa baths, whirlpools, bath panels and screens, showers, shower controls, shower cubicles, shower enclosures, shower stalls, shower trays and cases, shower panels and screens, shower spray heads, brackets for supporting shower spray heads, shower mixing valves, taps, mixers and faucets, radiators, valves, radiator valves, isolating valves, pipes, hoses and connectors, heaters, space heaters, water heaters, shower heaters, towel heaters, heated towel rails, heated towel rail accessories immersion heaters, water tanks, lids for water tanks, fans, extractor fans, ventilation ducting, toilets, toilet suites, toilet bowls, cisterns, regulating and safety apparatus for water or gas apparatus and pipes, vanity units, regulating and safety apparatus for water or gas apparatus and pipes, vanity units, light fittings, light switches, light pulls,

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thermostats, air conditioning equipment, furniture, mirrors, picture frames, furniture for bathrooms, separate bathroom, shower and sanitary units, combination bathroom, shower and sanitary units, non-metallic wall plugs, mirrored tiles, non-metallic towel hooks and rails, shower curtain rails, toilet utensils and containers, shower tidies, soap and sponge dishes and baskets, tooth brush, mug and tumbler holders, towel rails, towel rings, toilet brushes and brush holders, toilet roll holders, waste bins, pedal waste bins, bath racks, parts and fittings for the aforesaid goods, enabling customers to conveniently view and purchase those goods in a wholesale and/or retail outlet, by mail order, through a catalogue, or via a website.

8. The Logo is registered in the following classes:

   Class 19: Tiles; ceramic tiles; non-metal tiles; tile flooring, not of metal; wall tiles, not of metal; marble tiles; natural stone and stone tile; stone slabs; sintered stone slabs; ceramic; porcelain and natural stone floor and ceiling tiles; stone composite panels for bathroom vanities; wall panelling and flooring; flooring; artificial wood flooring; building materials (non-metallic); flooring (Non-metallic -); flooring underlays; grout; grouting materials; grouting preparations; hardwood flooring; laminate flooring; non-metal tiles; non-metallic building materials; non-metallic building tiles; parquet flooring; panelling of plastics; polyvinyl chloride panelling; rubber flooring; tile floorings, not of metal; wall panelling made of non-metallic materials; wood flooring; wood veneer parquet flooring; wooden flooring; parts and fittings for all the aforesaid.

   Class 35: Retail and wholesale services connected to the sale of tiles, ceramic tiles, non-metal tiles, tile flooring, not of metal, wall tiles, not of metal, marble tiles, natural stone and stone tile, stone slabs, sintered stone slabs, ceramic, porcelain and natural stone floor and ceiling tiles, stone composite panels for bathroom vanities, wall panelling and flooring, flooring, artificial wood flooring, building materials (non-metallic), flooring (Non-metallic -), flooring underlays, grout, grouting materials, grouting preparations, hardwood flooring, laminate flooring, non-metal tiles, non-metallic building materials, non-metallic building tiles, parquet flooring, panelling of plastics, polyvinyl chloride panelling, rubber flooring, tile floorings, not of metal, wall panelling made of non-metallic materials, wood flooring, wood veneer parquet flooring, wooden flooring, parts and fittings for all the aforesaid.

Infringement

9. It has come to our attention that you are using the Marks on your website, https://thehomedeliveryguys.com, in connection with the marketing and promotion of your return and collection services.

10. We enclose at Appendix A screenshots showing your use of the Marks.

11. We have not licensed or otherwise authorised you to use the Marks.

12. Further, if you search for “Victorian Plumbing Returns” through services such as Google,

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links to your website are returned, including:

https://thehomedeliveryguys.com/victorian-plumbing-return/

Trade mark infringement

13. The use of the Marks in connection with your services constitutes trade mark infringement pursuant to section 10 of the TMA.

14. The use of the Marks falsely suggests that THDG is commercially connected with Victorian Plumbing, when no such relationship exists. This is likely to cause confusion amongst customers and members of the public.

15. As a result of this use, there is a strong likelihood of confusion with the Marks. The Marks have acquired a substantial reputation in the UK and your use of them takes unfair advantage of, and is detrimental to, the distinctive character and reputation of the Marks.

Passing off

16. Your use of the Marks further amounts to an act of passing off.

17. You are making a misrepresentation which is very likely to lead to consumers believing that the services offered by you are related to Victorian Plumbing.

18. We have developed substantial goodwill and reputation in the UK and our branding, and your use of the Marks is extremely likely to cause confusion in the mind of the public who will consider that the services you provide are services provided by Victorian Plumbing or associated or connected with Victorian Plumbing.

19. In view of the substantial goodwill and reputation in the UK of Victorian Plumbing's business under the Marks, the practices described above are likely to lead the public to believe that the services the Company offer are those provided by Victorian Plumbing. The continuation of this practice is likely to cause substantial damage to our reputation and goodwill.

Losses

20. We are unable to properly quantify our losses at this stage but we are entitled to damages in respect of the losses we have suffered from this infringement, including but not limited to damage to reputation and goodwill, costs incurred and any other losses arising from your unauthorised use of the Marks. We are also entitled to seek an injunction preventing any further infringement.

21. We will also expect to be compensated for lost management time, given the amount of time

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that we have had to spend on this matter, including in relation to the protection of our brand, goodwill and reputation as a consequence of this infringement.

Next steps

22. We are entitled to immediately issue court proceedings and to request that the court make an interim order forcing you to immediately cease your infringing activities.

23. If court proceedings become necessary, the remedies available to us include injunctive relief, damages, legal costs and interest.

24. However, we would prefer to resolve this matter amicably. To this end, we request that you remove the Marks from your website and provide written confirmation that you have done so by no later than 5pm on 9 November 2026.

25. If you fail to comply then we may commence proceedings against you without further notice.

26. For the avoidance of doubt, Victorian Plumbing Limited reserves all of its rights in relation to this matter.

27. We look forward to hearing from you.

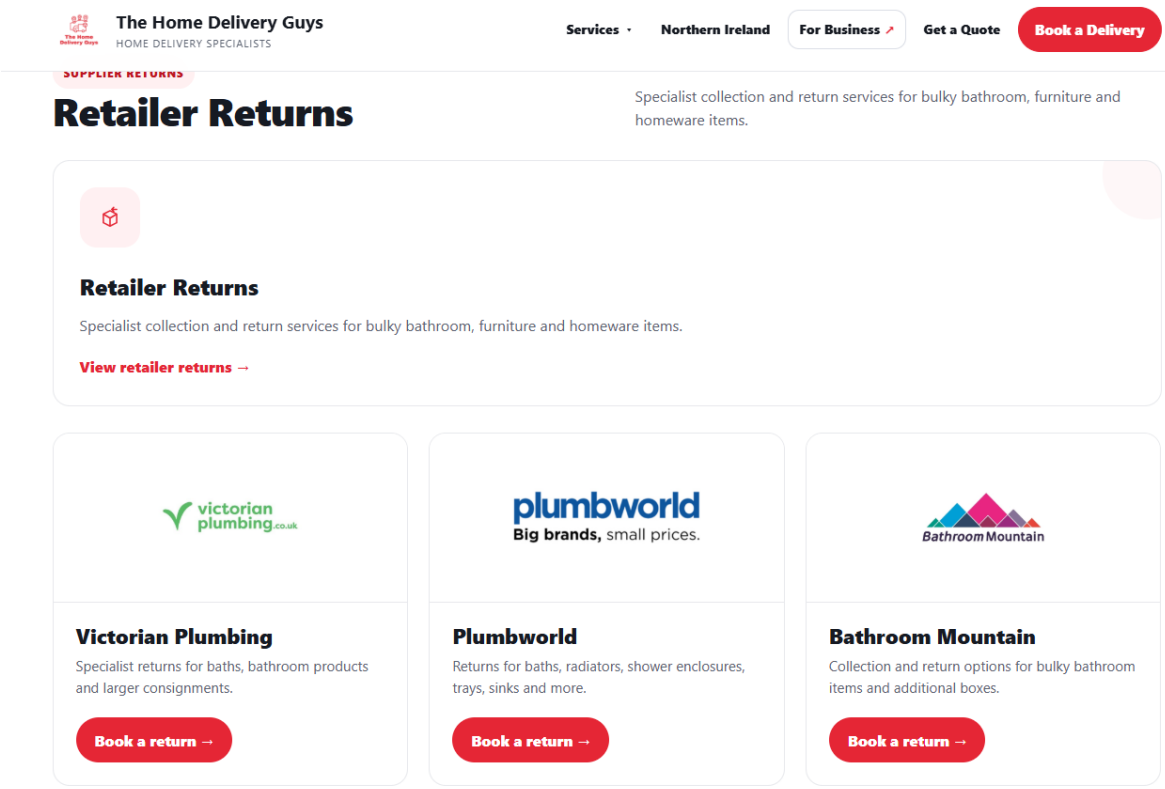
Yours faithfully,

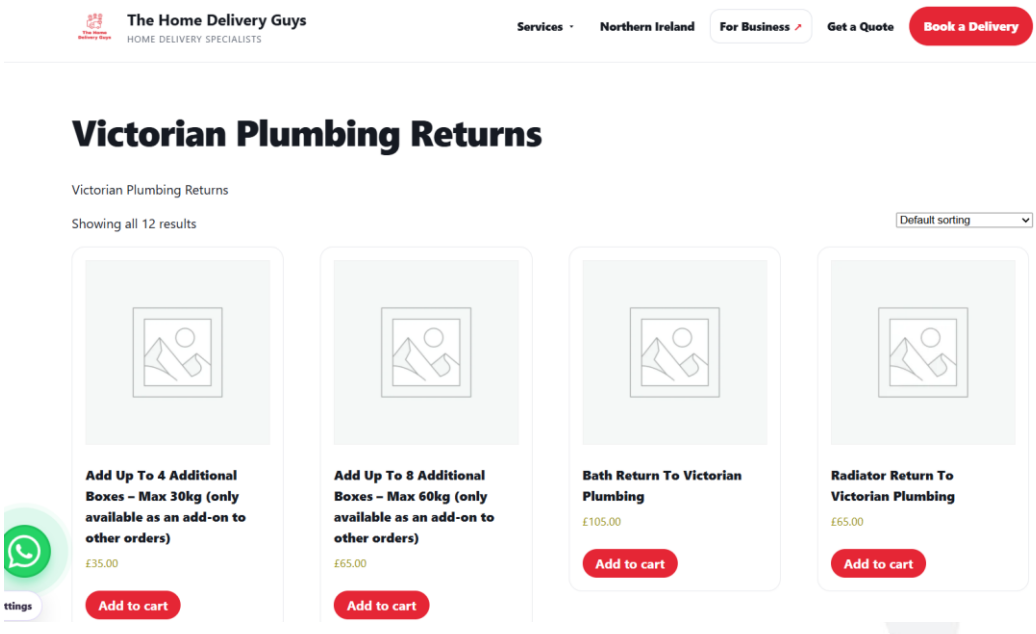
Alex Singer
General Counsel
For and on behalf of Victorian Plumbing Limited

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APPENDIX A – EXAMPLES OF INFRINGEMENT





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Victorian Plumbing Returns

Victorian Plumbing Returns is an independent courier service from The Home Delivery Guys for returning large Victorian Plumbing items, including pallet returns.

Items typically handled: Baths and tiles are the most common items on this route.

How to book: Choose your item below and book your collection online.

> **Refund reduced because of packaging?** Read our guide to challenging refund deductions and withheld refunds, with Government and Trading Standards links and a complaint template.

What we collect

We can assist with returning baths and tiles, along with pallet returns, to Victorian Plumbing. If you can't find the specific item you're looking to return, contact us directly.