NATIONAL ARBITRATION FORUM

NOTICE OF COMPLAINT

[redacted] v. [redacted]

[redacted]

[redacted]

Deadline to Respond: March 26, 2014

1. **Notification.** You are hereby notified that an administrative proceeding has been commenced against you pursuant to the Uniform Rapid Suspension System ("URS") (found at: http://newgtlds.icann.org/en/applicants/urs/procedure-01mar13-en.pdf). It concerns domain name(s) that are currently registered and being used by you. The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s). When you registered your domain name(s) you also agreed to submit to and participate in a mandatory administrative proceeding in the event that a third party (Complainant) submits a Complaint to an ICANN-approved dispute resolution service provider concerning a domain name registered and being used by you. This letter notifies you of your rights and responsibilities in summary format; you are responsible for reading and understanding the URS Procedure and Rules, as well as the Forum's Supplemental Rules.
2. **Date Complaint Received.** The Complaint was submitted by [redacted]. [redacted] and was received on February 21, 2014 by the National Arbitration Forum (Forum).
3. **Commencement of Administrative Proceeding.** The formal date of the commencement of the administrative proceeding is March 12, 2014. On this date the Complaint was sent to following email addresses pursuant to URS Procedure 4.1:
   [redacted]
   The Annexes to the Complaint are available on your web portal. Contact your case coordinator to receive or link your username. One of the emails you received included a secure link you must use to file your Response. If you have not received a copy of the Complaint or are missing this link, please notify the case coordinator listed at the bottom of this letter and provide the email address where you would like this information sent.
4. **What this means.** The Complainant has claimed that your registration of the domain name(s) listed at the top of this letter violates its trademark rights. The Registry for the domain name(s) listed at the top of this page has locked the domain name(s) so that you cannot transfer or delete them. If you do not respond, the Examiner may rule against you. If this happens, the domain name(s) will be directed to a neutral page and you will no longer have control of them.
5. **What you need to do.** Within 14 days from the commencement date, the Forum must receive, a Response and any evidence according to the requirements that are described in the URS (link above), the URS Rules (http://newgtlds.icann.org/en/applicants/urs/rules-04mar13-en.pdf) and the Forum's Supplemental Rules (http://domain.adrforum.com/resource.aspx?id=1870). You must log into your account on our portal by March 26, 2014 and submit your Response online. You may file your own Response or you may hire legal counsel to help you.
6. **Response Fee.** If this dispute involves more than 15 domain names, a Response fee will be due via credit card when your Response is filed (see the Supplemental Rules for the amount). Otherwise there is no charge to Respond.
7. **Default.** If your Response and/or required payment are not received by the above date, you will be considered in default. We will still appoint an Examiner to review the facts of the dispute and to decide the case.
8. **Late Response and Extensions.** If you need additional time to Respond, you must log into your account on our portal to request an Extension before the Response period is over to prevent the Examiner's Default Determination. If you do not Respond, or request an Extension, on time, you may still Respond for free up to thirty days after any Examiner Default Determination against you. If you wish to Respond, or request an Extension, you may log on to your portal to do so within six months of the Notice of Default. Additional fees may apply.
9. **Communications.** All communications will be made via email. If you email us regarding your case, you must copy the Complainant. All case documents will reside in your account on our portal, where you may access them at any time.
10. **The Administrative Proceeding.** We shall appoint the Examiner the date after your Response is due. You will be notified of the Examiner chosen at that time.
    The Examiner will have 3-5 days from the date of its appointment to issue a Determination in the case. We will forward the decision to you, the Complainant, the concerned Registrar(s), the Registries, and ICANN immediately upon receiving it from the Examiner. We will then post the decision on a publicly accessible web site. If you lose, your domain name(s) will no longer resolve. If you lose, you may Appeal the Examiner's Determination.
11. **Case Coordinators.** [redacted], at [redacted] has been appointed as Case Coordinator to be in charge of administering your case. Please note that, while the Case Coordinator is available to answer questions relating to such matters as filing requirements and to help you to understand the URS Procedure, Rules and Supplemental Rules, the Coordinator cannot provide you with any legal advice or make any representations on your behalf.
12. **Additional Links.**
    - ICANN URS Procedure: http://newgtlds.icann.org/en/applicants/urs/procedure-01mar13-en.pdf
    - ICANN URS Rules: http://newgtlds.icann.org/en/applicants/urs/rules-04mar13-en.pdf
    - FORUM Supplemental Rules: http://domain.adrforum.com/resource.aspx?id=1870
    - ICANN: http://www.icann.org
    - National Arbitration Forum: http://domains.adrforum.com.