DISPUTE RESOLUTION SERVICE COMPLAINT

1. Introduction

This Complaint is submitted in accordance with the Policy of the Dispute Resolution Service (the **DRS Policy**).

2. The Parties

2.1. Complainant

Lead Complainant:

Lead Complainant's contact details:

Additional Complainant(s):

Complainant's authorized representative:

Authorized representative details:

2.2. Respondent

Respondent:

Respondent's and/or Respondent's authorized representative's contact details (if known):

3. The Domain Name(s)

Domain Name(s):

☐Confirm the domain name(s) is(are) active and not expired.

4. Factual and Legal Grounds

Relevant Background

Legal Grounds

Must not exceed 5,000 words (not including the text set out in annexes)

4.1. You have Rights in a name or mark that is identical or similar to the domain name(s)

[Describe what Rights you are asserting and how they are identical or similar to the domain name. See paragraphs 1 and 4 of the DRS Policy and paragraph 2 of the Expert's Overview.]

4.2. The domain name(s), in the hands of the Respondent, is an Abusive Registration.

[Describe why the domain name is an Abusive Registration. See paragraphs 1, 4, and 5 of the DRS Policy and paragraphs 2 and 3 of the Expert's Overview.]

5. Remedies Requested

Remedy: Transfer

6. Other Legal Proceedings

7. List of Annexes and other materials

Paper files:

URL references:

8. Certification

☐ I have read, understood and accept the Policy of the Dispute Resolution Service. I understand that by submitting my Complaint it will be sent to the domain registrant for their response, that my personal details may be shared with the other parties, and ultimately the content of my Complaint may be published in a formal written decision.

☐ I confirm that by submitting a complaint under Nominet's Dispute Resolution Service, the Complainant submits to the exclusive jurisdiction of the English courts with respect to any legal proceedings seeking to reverse the effect of a decision requiring the suspension, cancellation, transfer or other amendment to a domain name registration(s), and the Complainant agrees that any such legal proceedings will be governed by English law.

☐ I (on behalf of the Complainant(s)) agree and accept that,

- The Complainant's claims and remedies concerning the registration of the domain name(s), the dispute, or the dispute's resolution shall be solely against the registrant and that neither Nominet UK nor its directors, officers, employees or servants nor any expert shall be liable for anything done or omitted in connection with any proceedings under the Dispute Resolution Service unless the act or omission is shown to have been in bad faith.

- The WIPO Arbitration and Mediation Center shall not be liable for anything done or omitted in connection with any proceedings under the Dispute Resolution Service unless the act or omission is shown to have been in bad faith.
- The information contained in this Complaint is to the best of the Complainant's knowledge true and complete. This Complaint is not being presented in bad faith and the matters stated in this Complaint comply with the Policy and applicable law.
- If the expert orders a transfer of the domain name(s) then the Complainant agrees to be bound by Nominet's Terms and Conditions for the Registration of Domain Names, and in particular the provisions relating to Nominet's processing of personal data.
- The Complainant agrees to the DRS Policy and will comply with it.

Signature:

Date: