

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OLYMPIC COMMITTEE,
INTERNATIONAL OLYMPIC COMMITTEE,
SALT LAKE ORGANIZING COMMITTEE
FOR THE OLYMPIC WINTER GAMES OF
2002,

Plaintiffs,

v.

2000OLYMPIC.COM, et al.,

Defendants.

CIVIL ACTION NO. 00-1018-A

**PLAINTIFFS' NOTICE OF MOTION AND MOTION
TO SET A TIME CERTAIN BY WHICH REGISTRANTS OF
DEFENDANT DOMAIN NAMES MUST RESPOND TO THE COMPLAINT**

PLEASE TAKE NOTICE that on February 14, 2003 at 10 a.m., or as soon thereafter as this motion may be heard, the United States Olympic Committee, the International Olympic Committee and Salt Lake Organizing Committee for the Olympic Winter Games of 2002 (collectively, the "Olympic Plaintiffs") will move this Court for an order requiring the 34 registrants (from 12 countries) of the last 45 Defendant Internet domain names remaining in this action to answer or otherwise plead to the allegations of the Olympic Plaintiffs' Complaint.

Respectfully submitted,

Bruce Rheinstein

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CERTIFICATE OF SERVICE

I hereby certify that on Feb. 6, 2003, I served the foregoing Notice of Motion and Motion To Set a Time Certain By Which Registrants of the Defendant Domain Names Must Respond to the Complaint, Memorandum in Support, and proposed Order upon the Registrants of the subject Domain Names by e-mail, facsimile, or international registered mail, return receipt requested, sent to the addresses listed in the "whois" information for those Domain Names.

David K. Heasley

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CIVIL ACTION NO. 00-1018-A

**MEMORANDUM IN SUPPORT OF PLAINTIFFS'
MOTION TO SET A TIME CERTAIN BY WHICH REGISTRANTS OF
DEFENDANT DOMAIN NAMES MUST RESPOND TO THE
COMPLAINT**

I. INTRODUCTION

The Olympic Plaintiffs filed this *in rem* case, based on the Anticybersquatting Consumer Protection Act ("ACPA"), 15 U.S.C. § 1125(d), against 1,800 domain names owned by 732 persons located in 54 countries outside the United States. The domain names contain the distinct, famous, and world-renowned trademarks OLYMPIC and OLYMPIAD (the "OLYMPIC Marks") and variations thereof, such as misspellings and foreign equivalents.

In the course of this action, the 1,800 domain names were divided into three groups. The first group consisted of 590 domain names that the Olympic Plaintiffs voluntarily dismissed, as the registrants had executed declarations providing for cancellation or transfer of the domain names.

The second group, comprising 854 domain names, was the subject of an Order entered by the Court on December 10, 2001 requiring their registrants to answer the Complaint within a time certain of 30 days. The registrants of those domain names failed to answer the Complaint within thirty (30) days, so Magistrate Judge Sewell accordingly rendered a Report and Recommendation on May 21, 2002 recommending entry of judgment against them by default. The Report and Recommendation is pending before the Honorable Judge Cacheris.

With respect to the third group, consisting of 356 domain names, the Plaintiffs encountered difficulty contacting the registrants due to inaccurate "Whois" information that the registrants had provided to their registrars. Accordingly, on Plaintiffs' motion, the Court issued an order on November 14, 2001 directing the registrars to institute false contact procedures, by which the registrars would either verify the registrants' e-mail, facsimile and postal addresses or cancel the domain names. At the end of the false contact procedures, which took months to complete, there remained in the third group only 45 domain names owned by 34 registrants with verified contact information. The other domain names in this group, which did not have accurate contact information, are being cancelled or transferred. The 45 domain names remaining in this *in rem* action are the subject of this present Motion.

II. DISCUSSION

In this Motion, the Olympic Plaintiffs seek an order from the Court setting a time certain for the 34 registrants (the "Registrants") of the 45 domain names (the "Domain

Names”) for which the Olympic Plaintiffs now have accurate contact information, to answer or otherwise plead to the Complaint within thirty (30) days.

A. This Case is Appropriate for Exercise of In Rem Jurisdiction Over the Domain Names

The Registry for the Domain Names, VeriSign, is located in this jurisdiction. And an in rem suit such as this may be brought in the jurisdiction where the registry for the domain names is located. CNN L.P. v. cnnnews.com, 177 F. Supp. 2d 506, 514 (E.D. Va. 2001) *aff’d in pertinent part* 2003 U.S.App. LEXIS 1065 (4th Cir., Jan. 23, 2003); Harrods Ltd. v. Sixty Internet Domain Names, 302 F.3d 214, 224-25 (4th Cir. 2002); Shaffer v. Heitner, 433 U.S. 186, 207 (1977). The Domain Names are registered with 14 registrars, whose registrar certificates have been filed with the Court, granting the Court dominion and control over the subject domain names. (See *Exhibit 1, Declaration of Mary P. Rhodes, at Paragraph 2, Attachment A, which lists the registrars, the dates the registrar certificates were filed with the Court, and the Domain Names registered with each registrar.*)

The registrants of the subject Domain Names would have been defendants under the allegations in the Complaint if there were personal jurisdiction over them, but since they reside outside the United States, personal jurisdiction cannot be established over them. 15 U.S.C. § 1125(d)(2)(A)(ii). The registration of the Domain Names with VeriSign, standing alone, is not a sufficient basis for asserting personal jurisdiction over their registrants. America Online v. Chih Hsien-Huang, 106 F. Supp. 2d 848, 854 (E.D. Va. 2000). When, as here, “a non-U.S. resident cybersquats on a domain name that infringes a U.S. trademark,” the trademark owner cannot obtain jurisdiction over the

registrant, but can bring an *in rem* action to vindicate his rights. H.R. Rep. 106-412, at 14 (1999). CNN, supra. See Lucent Technologies v. LucentSucks.com, 95 F. Supp. 2d 528, 532 n. 5 (E.D. Va. 2000) (legislative history indicates that 15 U.S.C. § 1125(d)(2)(A)(ii)(I) was enacted by Congress to provide remedies to trademark owners where domain names infringing their marks are registered by foreign entities over whom personal jurisdiction is not possible). The fact that the Registrants are residents of 12 foreign countries establishes a *prima facie* case of lack of personal jurisdiction by this Court under Fed. R. Civ. P. 8(a). See Alitalia-Linee Aeree Italiane S.p.A. v. Casinoalitalia.com, et al., 128 F. Supp.2d 340, 347 (E.D. Va. 2001) citing America Online v. Chih-Hsien Huang, 106 F. Supp. 2d 848, 853 (E.D. Va. 2000).

In addition, the Olympic Plaintiffs have exercised due diligence in confirming that the Court lacks personal jurisdiction over the Registrants. (See Exhibit 1 at Paragraph 3.) The Olympic Plaintiffs have no basis for believing that the Registrants have had contacts with the State of Virginia.

Consequently, the Court may exercise *in rem* jurisdiction over all of the subject domain names. 15 U.S.C. § 1125(d)(2)(A)(C).

B. The Registrants Have Been Notified In Accordance With the ACPA

The Olympic Plaintiffs have notified the registrants of these domain names of their violation of the ACPA and of Plaintiffs' intention to proceed with this action, in accordance with 15 U.S.C. § 1125(d)(2)(A)(i)(II)(aa). See Exhibit 1 at Paragraphs 5-11.¹

¹ Out of the 45 Domain Names in this Motion, five (5) of the domain name registrations were originally cancelled by their registrars because the registrant failed to respond to the registrars' false contact inquiries. Four of these five domain names were later re-registered by new registrants, and one was re-registered by the same registrant but with a new registrar. The Olympic Plaintiffs notified the new registrants through the contact information provided in the WHOIS database.

With this new information, the Olympic Plaintiffs initiated the steps outlined in the following paragraphs to ensure that the 34 Registrants were notified of their violation of the ACPA and of Plaintiffs' intent to proceed with this action.

First, Plaintiffs e-mailed a letter providing a hyperlink to the Complaint to the 34 Registrants. These e-mails were sent via PostMinder.biz, a certified Internet-based e-mail service that informs the sender when emails are received and opened. See Exhibit 1 at Paragraph 9. PostMinder indicated that 25 of those Registrants opened the e-mail. See Exhibit 1 at Paragraph 10.

Second, the Olympic Plaintiffs sent international letters, return receipt requested, to the Registrants' postal addresses, notifying the Registrants that the Complaint had been filed and providing them with the hyperlink to the Complaint. To date, the Olympic Plaintiffs have received return receipt postcards indicating that 12 Registrants received the notifications. See Exhibit 1 at Paragraph 8.

Third, a couple of the Registrants provided facsimile numbers in their Whois data. To these Registrants the Olympic Plaintiffs faxed a copy of the letter providing notification of the lawsuit and the Internet address at which the Complaint can be viewed. See Exhibit 1 at Paragraph 11.

In sum, in accordance with 15 U.S.C. §1125(d)(2)(A)(i)(II)(aa), the Olympic Plaintiffs have notified the 34 Registrants via e-mail, facsimile or registered mail of their alleged violation of the ACPA and of Plaintiffs' intent to proceed against them by this lawsuit.

C. Thirty Days Is an Appropriate Time To Answer

Since the remaining Registrants have been notified in accordance with 15 U.S.C. § 1125(d)(2)(A)(i)(II)(aa), it is now appropriate for this Court to set a time certain for the Registrants to answer or otherwise plead to the Complaint.

On December 10, 2001, the Court issued a Time Certain Order for another group of domain names in this action, allowing those registrants thirty (30) days from the date of that Order to answer or otherwise plead to the Complaint. This Order was consistent with Banco Inverlat v. WWWInverlat.com, 112 F. Supp. 2d 521 (E.D. Va. 2000), an *in rem* ACPA case in which the Court required the defendant, located in Mexico, to answer the Complaint within thirty (30) days of issuance of its order. Plaintiffs respectfully suggest that this time period is appropriate for the present group of Registrants, as well.

D. Means of Service

As with the prior Order Setting a Time Certain to Answer the Complaint, Plaintiffs ask that the instant Time Certain Order provide for service of the Order by means reasonably calculated to inform the Registrants of the pendency of this action, including service by e-mail, facsimile, and/or mail. Also, as with the prior Order, Plaintiffs ask that publication be waived.

Procedural due process requires that the Registrants be afforded notice “reasonably calculated under all of the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.” Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950). *See also* Shaffer v. Heitner, 433 U.S. 186 (1977); cited in Alitalia-Linee, *supra* 128 F. Supp. at 346. Whether a method of notice in an *in rem* case is so “reasonably calculated” is

determined by the nature of the action, the circumstances of the case, and the availability of alternative reliable, cost-effective forms of service. Greene v. Lindsey, 456 U.S. 444, 451-54 (1982). As the Court held in that case, “in arriving at the constitutional assessment [of the adequacy of notice], we look at the realities of the case before us.” Id. at 451.

In an *in rem* proceeding, where a registrant of a domain name is provided actual notice of the complaint, due process is satisfied under the ACPA. Banco Inverlat, 112 F. Supp. 2d at 523; Harrods Limited, 110 F. Supp. 2d at 422; Sri Ram Chandra Mission v. Saharjimg.org, 139 F. Supp. 2d 721, 723, n. 3 (E.D. Va. 2001).²

The United States Court of Appeals for the Ninth Circuit recently affirmed the use of e-mail as an alternative method for service of process in Rio Properties, Inc. v. Rio International Interlink, 284 F.3d 1007 (9th Cir. 2002). The Ninth Circuit recognized that in many cases, the only method of communication a trademark owner has with an infringer is through e-mail. Id. at 1017-18. E-mails and facsimiles are the most economical, immediate and reliable means of notifying Registrants. The registration agreements require that the Registrants provide their Registrars with current e-mail addresses at the time of registration, and that the Registrants provide Registrars with changes in the e-mails as they occur. The Registrars generally use e-mail to remind the Registrants when their Domain Names will expire and to investigate possible false contact information. In sum, e-mails are used in every aspect of the domain name registration, renewal and transfer process, and are the most appropriate means of notifying the Registrants of this action. See Exhibit 1 at Paragraph 12.

² Fed. R. Civ. P. Rule 4(f) procedures for service of a complaint on an individual in a foreign country are inapplicable to this matter. Cable News Network v. CNNNews.com, 162 F. Supp. 2d 484, 494, n. 26 (E.D. Va. Sept 18, 2001) (finding Rule 4(f) inapplicable).

The proposed Order provides that the Olympic Plaintiffs will serve the Court's Order on the Registrants by any means reasonably calculated to notify them of the Order, including without limitation e-mail, facsimile, and/or registered mail, using the addresses that have been verified by the registrars' false contact procedures. When, as here, the registrants receive notice by such other means, the Court may waive publication. Banco Inverlat, 112 F. Supp. 2d at 523.

III. CONCLUSION

The Olympic Plaintiffs respectfully request that the Court issue the attached Order providing that the registrants have thirty (30) days to answer or otherwise plead to the Complaint.

Respectfully submitted,

SILVERBERG GOLDMAN & BIKOFF, L.L.P.



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Date: Feb. 6, 2003

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OLYMPIC
COMMITTEE, et al.,

Plaintiffs,

v.

2000OLYMPIC.COM, et al.,

Defendants.

Civil Action No. 00-1018-A

DECLARATION

I, Mary P. Rhodes, hereby declare the following:

1. I, a person over the age of 18 years, am a law clerk at Silverberg Goldman & Bikoff, LLP and am not a party to this action.

Registrar Certificates

2. I have reviewed the registrar certificates (the "Registrar Certificates") that grant this Court dominion and control over the domain names subject to this Motion ("Domain Names") and have attached a chart listing the registrars ("Registrars"), the Domain Names associated with each Registrar and the dates when the Registrar Certificates were filed with the Court. See Attachment A.

Web Sites Associated with the Domain Names

3. As of November 4, 2002, I have reviewed all of the Domain Names to determine whether they have web sites. After reviewing the printouts of the Domain Names' web addresses, I have determined that 43 of the Domain Names do not have web

sites, although some Domain Names link to a Registrar-provided web site that merely indicates "Under Construction" or "Coming Soon."¹

4. I have reviewed the 2 web sites linked to the Domain Names and have determined that they either (1) are not interactive web sites, as they do not allow users to purchase goods or services over the Internet or (2) with respect to the one (1) web site that appears to be interactive ("olympicholidays.com"), it shows no contacts with any judicial district in the United States.²

Providing the Registrants of the Domain Names with a Copy of the Complaint

5. In attempting to contact the 34 Registrants of these 45 Domain Names, the Olympic Plaintiffs originally relied upon the "Whois" Contact Information (the e-mail and postal addresses and, where available, facsimile numbers) provided by the Registrants upon registration of the Domain Names and available for all Registrars at, e.g., www.betterwhois.com.

6. Persons, including trademark owners, seeking to contact registrants of domain names, rely upon the "Whois" Contact Information in order to contact the registrants of domain names for various reasons, e.g., to notify registrants that their domain names infringe trademarks. ICANN Announces Steps to Improve Whois Data Accuracy, (September 3, 2002) <<http://www.icann.org/announcements/announcement-03sep02.htm>>.

¹ Domain Names linked to "Under Construction" or "Coming Soon" web sites ("Coming Soon Domain Names"), i.e., they merely indicate a website is "Under Construction" or is "Coming Soon," were not included in the number of Domain Names that have actual web sites because the Coming Soon Domain Names have merely been registered with Registrars that provide this type of web page service and are not necessarily going to be linked to web pages. The Coming Soon Domain Names were thus included in the group of Domain Names that are mere registrations because the web sites of the Coming Soon Domain Names are not interactive.

² The other active web site is linked to www.olympicmail.com. This web site provides an overview of the Pelican Bay Hotel in Greece, but booking and availability requests are handled through an email address, not the web site.

To register domain names on behalf of registrants, a registrar must first become accredited by the Internet Corporation on Assigned Names and Numbers (ICANN), which administers top-level domains, including “.com”, “.net” and “.org”. The ICANN Registrar Accreditation Agreement requires Registrars to include provisions in their individual registration agreements that (1) require the registrants to list and maintain accurate Contact Information in their domain name registrations and (2) provide for domain name registration cancellation procedures when a registrant is suspected of providing or failing to update false contact information. See ICANN Registrar Accreditation Agreement at 3.7.7.1-3.7.7.2.

7. The 45 Domain Names in this action were subject to the Court Order to Initiate False Contact Procedures, which was issued November 14, 2001. The Olympic Plaintiffs made numerous attempts to contact the Registrants of these Domain Names through the “Whois” Contact Information that was provided, but these attempts were unsuccessful. Pursuant to the Court Order, the Registrars of 356 domain names initiated false contact procedures. Out of these 356 domain names, all but 40 of the 45 included in this action failed to respond to the Registrars’ inquiries.³ Accordingly, the domain names registrations of 316 domain names have been or will be cancelled or transferred. The Registrars supplied the Olympic Plaintiffs with updated Contact Information for 40 of the domain names in this action, and the contact information for the other 5 was obtained through the “Whois” Contact Information provided by the new registrants.

8. After obtaining the updated Contact Information, the Olympic Plaintiffs sent international letters, return-receipt requested, to the postal addresses of the 34

³ The other five Domain Names were originally cancelled as a result of the registrars’ false contact inquiries. After they were cancelled, four of these domain names were re-registered by a different registrant, and one was re-registered by the same registrant.

Registrants of the Domain Names in this action. These letters notified the Registrants of this action and provided the Internet address where the Registrants could view the Complaint. The 12 Registrants from whom the Olympic Plaintiffs received return receipts confirming delivery are indicated in the Sixth Column of Attachment B. See Attachment D.

9. E-mails were then sent via PostMinder to the e-mail addresses of the Registrants provided by the Registrars or listed in the "Whois" Contact Information. PostMinder is an Internet-based certified email service that allows "the most advanced email tracking, certification and security service available on the Web." See Attachment C.

10. To send an e-mail via PostMinder, the sender must log on to the web site www.postminder.biz. The sender then composes and sends e-mails similarly to any other web based e-mail service, e.g. Yahoo!Mail. When the recipient receives the email, it has a conspicuous notice at the bottom that the sender requested a notification that the recipient has received the e-mail. The sender can log on to the PostMinder web site to ascertain the status of the e-mail. For each e-mail sent via PostMinder, the sender can ascertain the time the e-mail was opened, how long it remained open, whether or not the e-mail was forwarded, and the apparent e-mail address at which the e-mail was opened. Because of this tracking technology, the Olympic Plaintiffs know whether or not the recipient opened the e-mail. The registrants who opened the e-mail are indicated in the Fourth Column of Attachment B.

11. Facsimiles were sent to the Registrants who had provided fax numbers in their Contact Information. The Registrants who were successfully sent facsimiles (as

verified by facsimile confirmations) are indicated in Seventh Column of Attachment B.

See Attachment E.

Use of E-mail by Registrars

12. I have also reviewed the web sites and registration agreements of fourteen (14) Registrars of these Domain Names (because the Hangang Systems, Inc. web site is in Korean and the Xin Net Corp web site for domain name registration is in Chinese, I could not review the features of these registrars' registration agreements) and noted many of the situations in which the Registrars' utilization of e-mail requires the Registrants to have valid e-mail addresses. These situations are discussed in the following chart, Chart

1.

CHART 1	
Abacus America, Inc. d/b/a Names4Ever	All updates to the registration agreements are notified by e-mail. All support problems, password reminders, and confirmations of modifications to domain name registrations are handled by e-mail. Registrar may terminate registrations via e-mail. Abacus suggests contacting it via e-mail to handle problems and questions.
Alabanza, Inc. d/b/a BulkRegister.com	A valid e-mail address is necessary in order to register a domain name or to change personal data in the registration. Renewal notices are sent to the registrant via e-mail. BulkRegister.com will notify the registrants of any problems with a domain name registrations, i.e., false contact inquiries or breaches of registration agreements, via e-mail.
CORE Council of Internet Registrars	E-mail address required to register any domain name. Any correspondence regarding domain name disputes must be sent via e-mail.
Domain Discover	E-mail address is required to register any domain name. Renewal notices are sent via email. If the registrant forgot their password, it is sent via email.
Domain Bank, Inc.	All requests for information are conducted via e-mail. Any transfer of domain name requires the new registrant to confirm the transfer via e-mail.

Joker.com	Support and information requests are conducted via e-mail. Transfer of a domain name requires e-mail verification. E-mail address is required to register a domain name. Notice of renewal is sent via e-mail.
Innerwise d/b/a ItsYourDomain.com	Technical support is provided via e-mail. Requires e-mail address to register a domain name and sends confirmation. Transfer requests are verified through e-mail.
Melbourne IT, Ltd. d/b/a Internet Names WorldWide	Termination of a domain name registration is e-mailed to the registrant.
NameScout.com	Renewal notice is sent via e-mail. E-mail address is required to register domain name. All correspondence is sent to e-mail address.
Register.com, Inc.	Changes in the information listed in the domain name registration must be confirmed via e-mail. Promotional offers are sent via e-mail. E-mail addresses are required to receive replies to inquiries made on Register.com's web page.
Stargate Communications	E-mail address is required to register a domain name. Confirmation of registrar transfer is conducted via e-mail.
Tucows, Inc.	Notifications from Tucows are sent to the registrant via e-mail. Technical support and other questions are answered via e-mail. E-mail addresses are required to transfer a domain name to Tucows.
VeriSign, Inc. (formerly Network Solutions, Inc.)	Notices are sent to the registrant via e-mail. In order to make changes to a domain name registration, the registrant must e-mail Verisign to receive a tracking number for their request. VeriSign encourages registrants to request technical support through e-mail.

I declare under penalty of perjury under the laws of the United States of America,
that the foregoing is true and correct. DATED this 5th day of February 2003.

Mary P. Rhodes
Mary P. Rhodes
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Washington, D.C. 20007

ATTACHMENT A:
CHART OF REGISTRAR CERTIFICATES FOR DOMAIN NAMES

Registrar Name	Domain Names Registered with Registrar	Date Registrar Certificate Filed with Court
Abacus America	olympicairways.com	7/10/2000
Alabanza, Inc. d/b/a BulkRegister.com	olimpic.com olympicgreats.com village-olympique.com villageolympique.com villageolympique.net village-olympique.net	7/18/2000; 11/25/2002
CORE Council of Internet Registrars	vila-olimpica.org	11/27/2002
Domain Bank, Inc	portolimpic.com	7/19/2000
Domain Discover d/b/a TierraNet Inc.	olympicmail.com	11/25/2002
Hangang	olympicpark.net olympique.com 2008beijingolympic.com olympicdomain.com	7/10/00 1/17/03
Innerwise d/b/a ItsYourDomain.com	olympicsguide.com	12/2/2002
Joker.com	olympiclifts.com	8/11/2000
Melbourne IT d/b/a Internet Names WorldWide	torontoolympicrentals.com olympicgamesgiveaway.com olympictab.com olympicons.com Australian-olympics-courtesy-course.com olympicmoments.com olympicsponsor.com china-olympic.com whistler-winter-olympics.com	7/10/2000
NameScout.com	olympicbid.com	11/18/2002
Register.com	losangelesolympics.com olympicswimmingteam.com olympicswimmingteams.com olympicswinwear.com olympicswimming.com	8/4/2000
Stargate Communications	olympicholidays.com	12/16/02
TuCows	olympicboulevard.com canadaolympic.com olympiccanada.com toolympics.com vancouverolympics.com	7/10/2000; 11/27/2002

VeriSign, Inc (formerly Network Solutions, Inc and Internet Domain Registrars)	djolympics.com olympicflowers.com olympics2024.com accessibleolympics.com olympicgamesturin.com olympicgamesturin.org olympicgamesturin.net	7/19/2000; 8/17/2000
Xin Net Corp	Olympic2008.net	1/30/03

ATTACHMENT B:
CHART OF NOTICE PROVIDED TO REGISTRANTS UNDER
15 U.S.C. 1125(d)(2)(A)(I)(II)(aa)

Registrant	Domain Name	Notice Sent via Email	Email Opened	Notice sent via Registered Mail	Return Receipt Received	Facsimile Confirmed
BigMart.com	olympicpark.net olympique.com	7/3/02		7/3/02		
Robert Weiland	olympicboulevard.com	7/3/02	7/3/02	7/3/02	7/22/02	
Chris Toms	dolympics.com	7/3/02	9/11/02	7/3/02	7/16/02	
Damian Macafee	olimpic.com	7/3/02		7/3/02		
John Connolly	olympicgreats.com	7/3/02	7/3/02	7/3/02	8/1/02	
Farmaha	canadaolympic.com olympiccanada.com	7/3/02	7/3/02	7/3/02		
Gregory Koulax	losangelesolympics.com	7/3/2002; 7/31/02	8/16/02	7/3/02	7/15/02	
HomesOnline	torontoolympicrentals.com	7/3/02	7/3/02	7/3/02		
Imagination Holdings	olympicgamesgiveaway.com olympictab.com	7/3/02		7/3/02	7/25/02	
Kibong Um	2008beijingolympic.com	7/3/02	7/4/02	7/3/02		
Kim Jong Shik	olympicdomain.com	7/3/02	7/4/02	7/3/02		
Robert Montori	village-olympique.com villageolympique.com villageolympique.net village-olympique.net	7/3/02	7/3/02	7/3/02		
K Papageorgopoulos	olympicairways.com	7/3/02	7/4/02	7/3/02		
Olympicmail.com	olympicmail.com	7/3/02	7/4/02	7/3/02		
Online Australia	olympicons.com	7/3/02		7/3/02		
Philip Neocleous	olympicflowers.com	7/3/02		7/3/02		
Jordi Jordi	vila-olimpica.org	7/3/02	7/4/02	7/3/02	7/26/02	
Urban Domain Inc	toolympics.com	7/3/02	7/3/02	7/3/02		
Visible Domain	olympics2024.com	7/3/02	7/3/02	7/3/02	7/30/02	
Training Online International	australian-olympics- courtesy-course.com	7/3/02		7/3/02	7/22/02	
Travelability	accessibleolympics.com	7/31/02	7/31/02	7/31/02		
Damian Fogarty	olympicswimming.com olympicswimmingteams.com olympicswimmingteam.com olympicswimwear.com	7/31/02; 7/31/02	7/31/02	7/31/02		7/31/02
Antonio Carrano	olympicmoments.com	7/31/02		7/31/02	8/16/02	
Craig Missell	olympicsponsor.com	7/31/02	7/31/02	7/31/02	8/19/02	
Zhao Yanpei	china-olympic.com	8/5/02		8/5/02		
Andrew Lobel	whistler-winter-olympics.com	8/5/02	8/7/02	8/5/02	8/21/02	8/5/02
Itaca Multimedia sas	olympicgamesturin.com olympicgamesturin.org olympicgamesturin.net	10/2/02		10/2/02	10/21/02	
Informatiebeheer Malgrat	portolimpic.com	10/2/02	10/3/02	10/2/02		
Philip McVeigh	olympiclifts.com	10/2/02		10/2/02		
Jerjes Haddad	olympicbid.com	10/2/02	10/2/02	10/2/02		
John Brosseau	VancouverOlympics.com	10/9/02	10/9/02	10/9/02		
Chen Gengqiu	Olympic2008.net	10/9/02	10/9/02	10/9/02		
Olympic Holidays Group	OlympicHolidays.com	10/9/02	10/10/02	10/9/02		
Thangadurai Johnson	OlympicsGuide.com	10/9/02	10/10/02	10/9/02		

ATTACHMENT C:
CONFIRMATION OF REGISTRANTS' RECEIPT OF E-MAILS

EMAIL NOTIFICATION SENT VIA POSTIMINDER

Re: OlympicsGuide.com; Notification to Registrants of Alleged Violation of Anticybersquatting Consumer Protection Act, 15 U.S. Code § 1125(d), and of Intent to Proceed With In Rem Civil Action, *United States Olympic Committee et al. v. 2000olympic.com et al.*, Civil Action No. 00-1018-A in the United States District Court for the Eastern District of Virginia.

Dear Mr. Johnson:

The United States Olympic Committee, the International Olympic Committee, and Salt Lake Organizing Committee for the Olympic Winter Games of 2002 (collectively, the "Olympic Plaintiffs") have filed civil action No. 00-1018-A in the United States District Court for the Eastern District of Virginia regarding domain names that you have registered containing the trademarks "Olympic" and "Olympiad" and simulations and foreign equivalents of those trademarks (the "Domain Names").

The Olympic Plaintiffs allege that the Domain Names violate their rights under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). To redress this alleged violation, the Olympic Plaintiffs are proceeding with this in rem civil action under 15 U.S.C. § 1125(d). You can view or download a copy of the Complaint and its exhibits in this civil action at www.sgbdc.com/IOCinremsuit.htm.

The registrations of the Domain Names named in the Complaint have been deposited in the registry of the Court, and the Court has dominion and control over the Domain Names, which cannot be transferred without the Court's permission.

You may settle this case by transferring the Domain Names that you own to the Olympic Plaintiffs in return for having the civil action dismissed against those domain names. If you are interested in settling, please click on the Settlement Procedures link on the website www.sgbdc.com/IOCinremsuit.htm and follow the instructions. If you have any questions, please contact James L. Bikoff, Esquire or David K. Heasley, Esquire.

James L. Bikoff, Esquire
Silverberg, Goldman & Bikoff
Suite 120
1101 30th Street, N.W.
Washington, D.C. 20007
Facsimile: (202) 944-3306
email: jbikoff@sgbdc.com
Telephone: (202) 944-3303

David K. Heasley, Esquire
Silverberg, Goldman & Bikoff
Suite 120



• Tracked Mail • Send Mail • DocMinder • My Account • FAQs

PostMinderSM Send Mail

From: Silverberg Goldman & Bikoff LLP <dheasley@sbgdc.com>
To: king_relax@yahoo.com.postminder.biz
Subject: OlympicsGuide.com
CC: BCC:

Send Options: (You may select as many send options as you like for this email.)

- ☐ Send certified email ☐ Send self-destructing email ☐ Use ensured-receipt
☐ Send a copy of this email to my own mail inbox.

Send

Re: Notification to Registrants of Alleged Violation of Anticybersquatting Consumer Protection Act, 15 U.S. Code § 1125(d), and of Intent to Proceed With In Rem Civil Action, United States Olympic Committee et al. v. 2000olympic.com et al., Civil Action No. 00-1018-A in the United States District Court for the Eastern District of Virginia.

Dear Mr. Johnson:

The United States Olympic Committee, the International Olympic Committee, and Salt Lake Organizing Committee for the Olympic Winter Games of 2002 (collectively, the "Olympic Plaintiffs") have filed civil action No. 00-1018-A in the United States District Court for the Eastern District of Virginia regarding domain names that you have registered containing the trademarks "Olympic" and "Olympiad" and simulations and foreign equivalents of those trademarks (the "Domain Names").

The Olympic Plaintiffs allege that the Domain Names violate their rights

Send

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PostMinderSM Tracked Mail



Listed below are emails that you have sent using PostMinder. [click here to refresh](#)

Date	Recipient	Subject	Opened?
09-Oct	king_relax@yahoo.com	✓ OlympicsGuide.com	10-Oct-02 05:21:43
09-Oct	andreas@olympicholidays.co.uk	✓ OlympicHolidays.com	10-Oct-02 04:27:56
09-Oct	a.q@263.net	✓ Olympic2008.net	09-Oct-02 22:18:01
09-Oct	johnbrosseau@shaw.ca	✓ VancouverOlympics.com	09-Oct-02 12:56:44
02-Oct	D-6653mxvr@usersa3.-domainsatcost.ca	✓ Olympicbid.com	02-Oct-02 22:19:34
02-Oct	postmaster@malgrat.nl	✓ Portolimpic.com	03-Oct-02 09:38:20
02-Oct	hostmaster@olympiclifcs.com#0	✓ Olympiclifcs.com	07-Oct-02 08:47:33
02-Oct	jr@barossa.org	✓ Olympicapartments.com	03-Oct-02 09:17:47
02-Oct	itaca@ITACA.COM	⌘ Olympicgamesturin.com, Olympicgamesturin net, Olympicgamesturin.org	not yet.
05-Aug	andrew@thinkingfish.com	✓ whistler-winter-olympics.com	07-Aug-02 02:27:22
05-Aug	hostmaster@verio-hosting.com	⌘ skeetolympique.org	not yet.
05-Aug	dmain@netregistry.com.au	⌘ olympiclegends.com, olympicminutes.com	not yet.
05-Aug	support@namecity.com	⌘ olympic12.com; olympics08.com	not yet.
05-Aug	zhaoy@uni-net.com.cn	⌘ china-olympic.com	not yet.
05-Aug	noc@internic.ca	✓ 2016olympics.net	05-Aug-02 15:06:05
31-Jul	craigmissell@hotmail.com	✓ olympicsponsor.com	31-Jul-02 19:13:17
31-Jul	tcarrano@macquarie.com.au	⌘ olympicmoments.com	not yet.
31-Jul	senator@hutch.com	⌘ olympicswimming.com; olympicswimmingteams.com; olympicswimmingteam.com; olympicswim	not yet.
31-Jul	DandSFogarty@aol.com	✓ olympicswimming.com; olympicswimwear.com; olympicswimmingteam.com; olympicswimmi	31-Jul-02 18:53:31
31-Jul	gkoulax@blackjacklimo.com	⌘ losangelesolympics.com	not yet.
31-Jul	d1b5@aol.com	✓ accessibleolympics.com	31-Jul-02 14:16:02
24-Jul	D-6653mxvr@usersa3.-domainsatcost.ca	✓ olympicbid.com	06-Aug-02 20:20:28
17-Jul	admin@inetprohost.com	✓ olympic2008.org	22-Jul-02 11:01:09
10-Jul	artaxxa@hotmail.com	✓ olympicsgames.com	10-Jul-02 14:58:00
10-Jul	info@domainsource.com	✓ olympicgroup.com	10-Jul-02 13:01:33
10-Jul	andrew@domainsource.com	✓ olympicgroup.com	22-Jul-02 00:32:22
10-Jul	info@dictiorasis.com	✓ olympicholidays.com	10-Jul-02 13:32:07

<input type="checkbox"/> 03-Jul dmain@netregistry.com.au	australian-olympics-courtesy-course.com	not yet.
<input type="checkbox"/> 03-Jul alan-white@talk21.com	<input checked="" type="checkbox"/> olympics2024.com	03-Jul-02 13:18:14
<input type="checkbox"/> 03-Jul tasears@hotmail.com	<input checked="" type="checkbox"/> tolympics.com	03-Jul-02 17:15:51
<input type="checkbox"/> 03-Jul hostmaster@zetnet.net	<input checked="" type="checkbox"/> accessibleolympics.com	11-Jul-02 14:11:49
<input type="checkbox"/> 03-Jul null@nominalia.com	<input checked="" type="checkbox"/> vila-olimpica.org	04-Jul-02 02:27:00
<input type="checkbox"/> 03-Jul neocls@cytanet.com.cy	olympicflowers.com	not yet.
<input type="checkbox"/> 03-Jul mbradley@oal.com.au	olympicicons.com	not yet.
<input type="checkbox"/> 03-Jul info@olympicmail.com	<input checked="" type="checkbox"/> olympicmail.com	04-Jul-02 03:59:12
<input type="checkbox"/> 03-Jul papageo@pt.lu	<input checked="" type="checkbox"/> olympicairways.com	04-Jul-02 15:37:42
<input type="checkbox"/> 03-Jul rmontori@etxeama.com	<input checked="" type="checkbox"/> villageolympique.com, villageolympique.net, village-olympique.com (and .net)	03-Jul-02 12:01:54
<input type="checkbox"/> 03-Jul kjs2000@altavista.co.kr	<input checked="" type="checkbox"/> olympicdomain.com	04-Jul-02 20:39:58
<input type="checkbox"/> 03-Jul vox@unitel.co.kr	<input checked="" type="checkbox"/> 2008beijingolympic.com	04-Jul-02 06:40:30
<input type="checkbox"/> 03-Jul webmaster@imagination-com.au	olympicgamesgiveaway.com; olympictab.com	not yet.
<input type="checkbox"/> 03-Jul randybasian@hotmail.com	<input checked="" type="checkbox"/> torontoolympicrentals.com	03-Jul-02 21:53:30
<input type="checkbox"/> 03-Jul gregkoulax@hotmail.com	<input checked="" type="checkbox"/> losangelesolympics.com	16-Aug-02 19:31:43
<input type="checkbox"/> 03-Jul svgaf@direct.com	<input checked="" type="checkbox"/> canadaolympic.com; olympiccanada.com	03-Jul-02 14:27:39
<input type="checkbox"/> 03-Jul epocire@hotmail.com	<input checked="" type="checkbox"/> olympicgreats.com	03-Jul-02 20:32:24
<input type="checkbox"/> 03-Jul macafee@inbox.ru	olimpic.com	not yet.
<input type="checkbox"/> 03-Jul chris@minus13.com	<input checked="" type="checkbox"/> djolympics.com	11-Sep-02 11:00:17
<input type="checkbox"/> 03-Jul rwellan@worldtractor.com	<input checked="" type="checkbox"/> olympicboulevard.com	03-Jul-02 14:33:35
<input type="checkbox"/> 03-Jul ceo@bigmart.com	olympicpark.net; olympique.com	not yet.

Delete Selected

Select all

To erase one or more emails, check the box next to it and click the "Delete Selected" button. Note that any item you delete will no longer be tracked.

All times converted to "US/Eastern" time.

ATTACHMENT D:
EXAMPLE OF NOTIFICATION LETTER SENT VIA INTERNATIONAL MAIL

**SILVERBERG
GOLDMAN &**

BIKOFF, L.L.P. Georgetown Place • Suite 120 • 1101 30TH Street, NW • Washington, D.C. 20007

Voice (202) 944-3300 • Facsimile (202) 944-3306

Writer's Direct Dial: (202) 944-3303 • Writer's E-Mail: jbikoff@sgbdc.com

ATTORNEYS AT LAW

October 2, 2002

Via e-mail and Registered Mail

Olympic Lifts
Philip McVeigh
202/204 McAvoy House
17a Ormeau Avenue
Belfast
BT2 8HD
UK

Re: Olympiclifts.com

Notification to Registrants of Alleged Violation of Anticybersquatting Consumer Protection Act, 15 U.S. Code § 1125(d), and of Intent to Proceed With In Rem Civil Action, *United States Olympic Committee et al. v. 2000olympic.com et al.*, Civil Action No. 00-1018-A in the United States District Court for the Eastern District of Virginia.

Dear Mr. McVeigh:

The United States Olympic Committee, the International Olympic Committee, and Salt Lake Organizing Committee for the Olympic Winter Games of 2002 (collectively, the "Olympic Plaintiffs") have filed civil action No. 00-1018-A in the United States District Court for the Eastern District of Virginia regarding domain names that you have registered containing the trademarks "Olympic" and "Olympiad" and simulations and foreign equivalents of those trademarks (the "Domain Names").

The Olympic Plaintiffs allege that the Domain Names violate their rights under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). To redress this alleged violation, the Olympic Plaintiffs are proceeding with this in rem civil action under 15 U.S.C. § 1125(d). You can view or download a copy of the Complaint and its exhibits in this civil action at www.sgbdc.com/IOCinremsuit.htm.

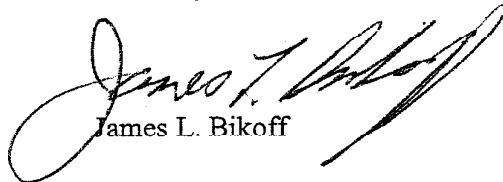
The registrations of the Domain Names named in the Complaint have been deposited in the registry of the Court, and the Court has dominion and control over the Domain Names, which cannot be transferred without the Court's permission.

You may settle this case by transferring the Domain Names that you own to the Olympic Plaintiffs in return for having the civil action dismissed against those domain names. If you are interested in settling, please click on the Settlement Procedures link on the website www.sgbdc.com/IOCinremsuit.htm and follow the instructions. If you have any questions, please contact James L. Bikoff, Esquire or David K. Heasley, Esquire.

James L. Bikoff, Esquire Silverberg, Goldman & Bikoff Suite 120 1101 30 th Street, N.W. Washington, D.C. 20007 Facsimile: (202)944-3306 e-mail: jbikoff@sgbdc.com Telephone: (202)944-3303	David K. Heasley, Esquire Silverberg, Goldman & Bikoff Suite 120 1101 30 th Street, N.W. Washington, D.C. 20007 Facsimile: (202)944-3306 e-mail: dheasley@sgbdc.com Telephone: (202)944-2339
---	--

If you do not wish to proceed with settlement, we will, at the appropriate time, provide you with notice of when you will need to enter an appearance and plead in this civil action by answering the Complaint and raising any defense or claim you may have relating to the civil action. If you fail to respond, the Domain Names you own may be transferred to the Olympic Plaintiffs or cancelled.

Sincerely,



James L. Bikoff

ATTACHMENT E:
NOTIFICATION LETTERS SENT VIA FACSIMILE

SILVERBERG, GOLDMAN & BIKOFF, L.L.P.

Georgetown Place
Suite 120
1101 30th Street, N.W.
Washington, D.C. 20007
www.sgbdc.com

Telephone No. (202) 944-3300 • Facsimile No. (202) 944-3306

TELECOPIER COVER SHEET

TO: Mr. Damian Fogarty

FROM: Mr. James L. Bikoff

DATE: July 31, 2002

RE: olympicswimming.com; olympicswimmingteams.com;
olympicswimmingteam.com; olympicswimwear.com

CLIENT NO.: 9401

NUMBER OF PAGES (including cover sheet):..... 3

FACSIMILE NUMBER:..... 011 61 2 9150 4912

TRANSMISSION PROBLEMS, PLEASE CALL..... (202) 944-3300

Please see attached.

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***** -COMM.JOURNAL- ***** DATE JUL-31-2002 ***** TIME 11:51 *** P.01

MODE = TRANSMISSION

START=JUL-31 11:49

END=JUL-31 11:51

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
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001	OK		011612915049129	003		
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-SILVERBERG, GOLDMAN & BIKOFF-

***** -202 944 3306 - ***** 1 202 944 3306- *****

SILVERBERG, GOLDMAN & BIKOFF, L.L.P.

Georgetown Place
Suite 120
1101 30th Street, N.W.
Washington, D.C. 20007
www.sgbdc.com

Telephone No. (202) 944-3300 • Facsimile No. (202) 944-3306

TELECOPIER COVER SHEET

TO: Mr. Andrew Lobel
FROM: Mr. James L. Bikoff
DATE: August 5, 2002
RE: whistler-winter-olympics.com
CLIENT NO.: 9401

NUMBER OF PAGES (including cover sheet):..... 3

FACSIMILE NUMBER:..... 011 44 8701640224

TRANSMISSION PROBLEMS, PLEASE CALL.....(202) 944-3300

Please see attached.

PRIVATE AND CONFIDENTIAL: | The documents accompanying this fax transmission contain confidential information belonging to the sender which is legally privileged. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this faxed information is strictly prohibited. If you have received this fax in error, please immediately notify us by telephone to arrange for return of the original documents to us.

***** -COMM. JOURNAL- ***** DATE AUG-05-2002 ***** TIME 16:06 *** P.01

MODE = TRANSMISSION

START=AUG-05 16:04

END=AUG-05 16:06

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
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001	OK	2	011448701640224	003		
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-SILVERBERG, GOLDMAN & BIKOFF-

***** -202 944 3306 - ***** 1 202 944 3306- *****

**SILVERBERG
GOLDMAN &**

BIKOFF, L.L.P. Georgetown Place • Suite 120 • 1101 30TH Street, NW • Washington, D.C. 20007

Voice (202) 944-3300 • Facsimile (202) 944-3306
Writer's Direct Dial: (202) 944-3303 • Writer's E-Mail: jbikoff@sgbdc.com

ATTORNEYS AT LAW

Via Facsimile

Re: Notification to Registrants of Alleged Violation of Anticybersquatting Consumer Protection Act, 15 U.S. Code § 1125(d), and of Intent to Proceed With In Rem Civil Action, *United States Olympic Committee et al. v. 2000olympic.com et al.*, Civil Action No. 00-1018-A in the United States District Court for the Eastern District of Virginia.

To the Registrants of "Olympic" Domain Names:

The United States Olympic Committee, the International Olympic Committee, and Salt Lake Organizing Committee for the Olympic Winter Games of 2002 (collectively, the "Olympic Plaintiffs") have filed civil action No. 00-1018-A in the United States District Court for the Eastern District of Virginia regarding domain names that you have registered containing the trademarks "Olympic" and "Olympiad" and simulations and foreign equivalents of those trademarks (the "Domain Names").

The Olympic Plaintiffs allege that the Domain Names violate their rights under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). To redress this alleged violation, the Olympic Plaintiffs are proceeding with this in rem civil action under 15 U.S.C. § 1125(d). You can view or download a copy of the Complaint and its exhibits in this civil action at www.sgbdc.com/IOCinremsuit.htm.

The registrations of the Domain Names named in the Complaint have been deposited in the registry of the Court, and the Court has dominion and control over the Domain Names, which cannot be transferred without the Court's permission.

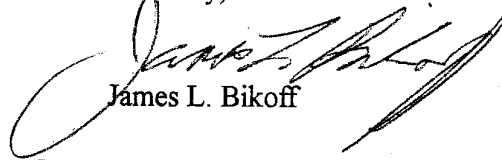
You may settle this case by transferring the Domain Names that you own to the Olympic Plaintiffs in return for having the civil action dismissed against those domain names. If you are interested in settling, please click on the Settlement Procedures link on the website www.sgbdc.com/IOCinremsuit.htm and follow the instructions. If you have any questions, please contact James L. Bikoff, Esquire or David K. Heasley, Esquire.

James L. Bikoff, Esquire
Silverberg, Goldman & Bikoff
Suite 120
1101 30th Street, N.W.
Washington, D.C. 20007
Facsimile: (202)944-3306
e-mail: jbikoff@sbgdc.com
Telephone: (202)944-3303

David K. Heasley, Esquire
Silverberg, Goldman & Bikoff
Suite 120
1101 30th Street, N.W.
Washington, D.C. 20007
Facsimile: (202)944-3306
e-mail: dheasley@sbgdc.com
Telephone: (202)944-2339

If you do not wish to proceed with settlement, we will, at the appropriate time, provide you with notice of when you will need to enter an appearance and plead in this civil action by answering the Complaint and raising any defense or claim you may have relating to the civil action. If you fail to respond, the Domain Names you own may be transferred to the Olympic Plaintiffs or cancelled.

Sincerely,



James L. Bikoff

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OLYMPIC COMMITTEE,
INTERNATIONAL OLYMPIC COMMITTEE,
SALT LAKE ORGANIZING COMMITTEE
FOR THE OLYMPIC WINTER GAMES OF
2002,

Plaintiffs,

v.

2000OLYMPIC.COM, et al.,

Defendants.

CIVIL ACTION NO. 00-1018-A

ORDER SETTING A TIME CERTAIN TO RESPOND TO THE COMPLAINT

This matter comes before the Court on Plaintiffs' Motion to set a time certain to respond to the Complaint, and the Court finding that Plaintiffs have provided actual notice to the Registrants of the Defendant Domain Names and have complied with 15 U.S.C. §1125(d)(2)(A)(ii)(II)(aa) by sending notice of the alleged violation of the Plaintiffs' rights and intent to proceed with this in rem action to the Registrants' postal and email addresses,

IT IS HEREBY ORDERED THAT:

1. The Court has jurisdiction, dominion and control over the 45 domain names ("Domain Names") subject to this Order.
2. Registrants and any other persons, parties, entities, or claimants having or claiming an interest in the subject Domain Names (hereafter, "Interested Parties") have thirty (30) days from the date of this Order to answer or plead to the Complaint in this action. A copy of Plaintiffs' Complaint may be viewed at the

Internet website, www.sgbdc.com, of Plaintiffs' attorneys, Silverberg Goldman and Bikoff, LLP, 1101 30th Street, NW, Suite 120, Washington, D.C. 20007. Their telephone number is (202) 944-3300 and their facsimile number is (202) 944-3306. Interested Parties who answer or otherwise plead to the Complaint must file the answer or other pleading with the Clerk of the Court, United States District Court for the Eastern District of Virginia, Alexandria Division, 401 Courthouse Square, Alexandria, Virginia, USA, 22314-5798, and serve the answer or other pleading on Plaintiff's attorneys, Silverberg Goldman and Bikoff, LLP, 1101 30th Street, NW, Suite 120, Washington, D.C. 20007.

3. If any Registrant or other Interested Party does not answer the Complaint within the time period required by this Order, the Court may render a judgment determining the extent and validity of that person's interest in the Domain Name(s). The Court's judgment may result in the Domain Name(s) being canceled, forfeited, or transferred to Plaintiffs.
4. Plaintiffs' attorneys shall send Registrants of the Domain Names notice of this Order within ten (10) days of the date of this Order by any means reasonably calculated to notify them of this Order, including without limitation, by: e-mail, facsimile, and international mail.
5. This Court hereby waives publication under 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(bb).

ENTERED this ____ day of February 2003

United States Judge