### WORLD INTELLECTUAL PROPERTY ORGANIZATION ARBITRATION AND MEDIATION CENTER

DHL Operations, B.V. DHL International, GmbH **Complainants** 

v.

Disputed Domain Name: mydhl.com

Eric J. White **Respondent** 

#### **RESPONSE**

(Rules, ¶ 5(b))

On January 12, 2010, the Respondent received a Notification of Complaint and Commencement of Administrative Proceeding from the WIPO Arbitration and Mediation Center (**Center**) by both email and fax informing the Respondent that an administrative proceeding had been commenced by the Complainant in accordance with the Uniform Policy for Domain Name Dispute Resolution, adopted by the Internet Corporation for Assigned Names and Numbers (**ICANN**) on August 26, 1999 (the **UDRP**), the Rules for Uniform Domain Name Dispute Resolution Policy, approved by ICANN on October 24, 1999 (the **UDRP Rules**), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **WIPO Supplemental UDRP Rules**). The Center set October 11, 2009 as the date for the submission of a Response by the Respondent.

The Respondent hereby responds to the statements and allegations in the Complaint and respectfully requests the Panel to deny the remedy requested by the Complainant.

### Respondent's Contact Details

(UDRP Rules, ¶ 5(b)(ii) and (iii))

For the purposes of the administrative proceeding, the Respondent's contact details are as follows:

Name:	Eric J. White
Address:	c/o Marc J. Randazza, Esq.
Telephone:	978-865-4101
Fax:	305-437-7662
E-mail:	mjrpa@me.com

The Respondent's authorized representative in this administrative proceeding is:

Marc John Randazza, Esq. Randazza Legal Group P.O. Box 5516 Gloucester, Massachusetts 01930 Tel: 978-865-4101 Fax: 305-437-7662

The Respondent's preferred method of communications directed to the Respondent in the administrative proceeding is as follows:

Electronic-only material Method: e-mail Address: mjrpa@me.com Contact: Marc John Randazza

Material including hardcopy Method: fax Address: P.O. Box 5516, Gloucester, MA 01930 Fax: 305-437-7662 Contact: Marc John Randazza

The Parties stipulated on January 13, 2010 that unless required by technological limitations, that all communications should be transmitted electronically between the parties and the Centre.

### Response to Statements and Allegations Made in Complaint The Requested Relief Should be Denied

(Policy, ¶¶ 4(a), (b), (c); Rules, ¶ 5)

### I. Introduction

The Complaint fails for two key reasons. First, the Respondent has legitimate rights to the domain name. Second, the Complainant has failed to establish either bad faith registration or bad faith use of the disputed domain name, and both are required in order for a Complainant to prevail under the policy.

The UDRP is not designed to resolve all Internet-related grievances. It is designed to handle a "relatively narrow class of cases of 'abusive registrations.'" See <u>Second Staff Report on Implementation Documents for the UDRP ¶ 4.1(c)</u>.

None of the factors in ¶ 4(b) of the UDRP apply. There is no evidence that Respondent has registered and used the domain name for the purpose of selling it for profit, conduct consistent with a pattern of cybersquatting. Respondent did not register the domain name to disrupt the business of a competitor, he registered it to express his political opinions. **See Annex A** – **a screen shot of the Respondent's website.** This constitutes Legitimate Noncommercial Fair Use. See Policy, Para. 4(c) (iii).

There is no indication that the Respondent has intentionally attempted to confuse anyone searching for DHL's own website, nor that anyone was unintentionally confused – even initially.

### II. The Complaint fails under $\P$ 4(a) of the UDRP.

In order for the Complainant to prevail, he must prove:

- (i) The domain name is identical or confusingly similar to a trademark in which the Complainant has rights; and,
- (ii) The Respondent has no rights or legitimate interests in respect of the domain name; and,
- (iii) The domain name has been registered and used in bad faith.

### A. The Complainant's Trademark

The Respondent concedes that the Complainant has trademark rights to "DHL" for transportation and delivery services, by virtue of its registered rights. As will be discussed below, however, these registered rights are irrelevant to this dispute.

# B. The domain name is neither identical nor confusingly similar to the Complainant's Trademark.

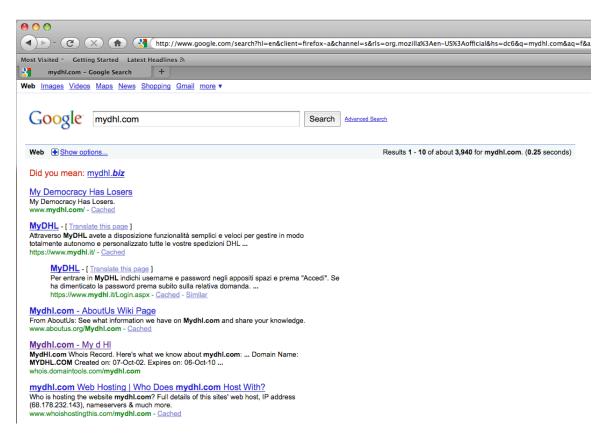
The complainant's mark is DHL. The domain name is MYDHL.com. It cannot be credibly argued that the two do not share some commonality. However, the similarity is not great, as the disputed domain name shares merely 60% of its letters with the Complainant's mark. More importantly, the correct test is not mere "similarity," but "**confusing** similarity," and that element is certainly lacking. In confronting this very issue, the panel in *Sallie Mae, Inc. v. Michele Dinoia*, WIPO Case No. D2004-0648 wrote:

Complainant has solid trademark rights in the mark SALLIE MAE in the United States, and that the word "sallie" is certainly similar to the trademark SALLIE MAE, but that in the context of this controversy and under its circumstances, there is no confusing similarity between Complainant's trademark and the disputed domain name.

In this case, there is <u>similarity</u>, but that similarity does not rise to the level of <u>confusing</u> similarity.

The Panel must examine the alleged mark and the domain name and ask whether any <u>sensible member of the public</u> would ever be confused. To further immortalize the words of Mr. Justice Foster, the only person who could possibly be misled would be "a moron in a hurry". See Morning Star Co-Operative Ltd. v. Express Newspapers Ltd [1979] FSR 113, 117; Newsweek, Inc. v. British Broadcasting Corp., [1979] RPC 441, 444 (Mr. Justice Walton approving of Foster's analysis). Canadian courts have also approved of this short-cut analysis rather than a tortured multi-factor analysis that is favored by we Americans. See, e.g., Ratiopharm Inc. v. Laboratoires Riva Inc., [2006] F.C.J. No. 1130 (Fed.C.C. 2006); Mattel, Inc. v. 3894207 Canada, Inc., 2006 SCC 22 (Can. Sup. Ct. 2006); Molson Canada v. Oland Breweries Ltd., [2001] O.T.C. 129 at P 21. ('It is not sufficient that the only confusion would be to a very small, unobservant section of society; or as Foster J. put it recently, if the only person who would be misled was "a moron in a hurry'.") When we examine the Complainant's services and the Complainant's website, and then we examine the Respondent's website and the content thereupon, it is easy to see that no sensible member of the public could mistake one for the other. In fact, even the Google results for "mydhl.com" make it clear that nothing even vaguely related to shipping services will present itself if a user clicks through to the Respondent's web page, thus eliminating even initial interest confusion.

Below, the Panel will see the search results for this term – clearly stating the title of Respondent's web page. Truly, could any reasonable person see this result and then click on that link in order to satisfy his or her global shipping needs? If the Panel answers that question in the negative, this case is over, and the Respondent must prevail.



Given that there is no confusing similarity, it would be proper for the Panel to reject the complaint without further analysis. See ITT Manufacturing Enterprises Inc. v. IT&T AG, WIPO Case No. D2001-0166. Nevertheless, the Respondent will continue to prove that the Complaint must fail for other reasons, just in case the Panel wishes to further entertain the complaint.

### C. The Respondent has rights and legitimate interests in the domain

"In these proceedings the onus is on Complainant to make out each of the grounds specified in paragraph 4(a) of the Policy. To make a showing that Respondent has no legitimate right or interest in the domain name, Complainant must as least set up a prime facie case and cast upon Respondent an onus of rebuttal" Action Concepts, Inc. d/b/a Fast Forward v. Rakuten USA, WIPO Case No. D2002-0032; Telefónica de Argentina, S.A. v. D. Pablo Castruna, WIPO Case No. D2002-0406.

In this case, the Complainant has failed to submit any evidence sufficient to shift the burden to the Respondent to prove his rights or legitimate interests. A failure such as this should terminate the proceedings in the Respondent's favor without further analysis. Nevertheless, the Respondent will provide arguments and evidence in support of its legitimate rights and interests so that when the Panel rules in Respondent's favor, the Panel can do so with the comfort of knowing that the Respondent has not prevailed due to a mere procedural error or inadvertent omission on the Complainant's part. On the contrary, even if the Complainant had properly taken the field with respect to this necessary factor, the Panel can see that the Complainant would have been driven back.

The Respondent's website clearly shows why this particular domain was chosen by the Respondent in 2005. The Respondent, while a fan of Democracy, and a proud American, feels that American Democracy is worthy of closer scrutiny - and that American Democracy produced "Losers" in his opinion. See Annex B - Respondent's Declaration at 2, ¶ 11. Mr. White selects the politicians that he deems to be "Losers," and places photos of them on his website. Mr. White considers American Democracy to be "his" Democracy. See Annex B - Respondent's Declaration at 2, ¶ 11. Accordingly MY Democracy Has Losers made perfect sense to him. See Annex B - Respondent's Declaration at 1, ¶ 4. This has been the use of the domain name, consistently, since 2005. Under paragraph 4(c)(i) of the Policy, such a use of the disputed domain name demonstrates that the Respondent has a right or legitimate interest in the domain name, so long as such use occurred "before any notice to [the Respondent] of the dispute." Given that the Respondent's use commenced in 2005, and this dispute did not arise until December 2009, it is clear that this legitimate use is not a desperate post-hoc explanation.

While the Complainant may have trademark rights to DHL, the Complainant does not own the three letters "DHL" in gross. In fact, even if the Respondent had registered DHL.com, but used it in a manner that could not create confusion with the mark holder, the Respondent would still be privileged to both register and use the domain. (For example, if he registered it to create a website for "Denver Highschool Lacrosse." Trademark rights are necessarily intertwined with use, and the Respondent's use should make it readily apparent that the Respondent did not register, nor has ever used, the domain name in connection with anything remotely close to the Complainant's goods and services.

### D. The Domain name was neither registered, nor used, in Bad Faith.

### 1. The Registration was in Good Faith

It is important to note that this domain was initially registered in 1999 by a Sean Dowd, and that it expired on May 28, 2001. **See Annex C.** The historical Whois report for this domain shows that between that date and 2005, the domain lay fallow, unnoticed, un-registered, and seemingly unimportant to anyone – including the Complainant. **See Annex D.** It seems strange that the Complainant, only now, finds the domain to be of such importance and so infringing of its long-standing mark, that it seeks to seize it from its rightful possessor. While there is no statute of limitations under the UDRP, this delay in asserting its rights certainly undermines the Complainant's claims.

"The longer the time between the registration of a disputed domain name and the assertion of the Complainant's rights the harder, in general, the inference of bad faith registration becomes to sustain." YIT Corporation v. Future Media Architects Inc., WIPO Case No. D2007-0588.

The Panel can see in **Annex E**, that the domain name was initially registered by the Respondent on September 23, 2003. The domain was registered, as discussed above, because it corresponded to the phrase "My Democracy Has Losers." **See Declaration of Respondent at 1, ¶ 4**.

Shortly after registration, the Respondent launched his website for the sole purpose of expressing political commentary. **See Annex F**, which shows how the domain name was used shortly after registration. As this image was retrieved from the Internet Archive, some images have not been preserved, but this will show that the use that the panel will find at mydhl.com today is the same use that the domain has had historically since it was launched. With the exceptions of some short, isolated periods when the Respondent's hosting was in the process of being changed, this has been the constant use.

### 2. The Respondent's Use has always been in Good Faith

The remaining screen shots of the domain show that it most clearly has been used consistently since its initial registration. The website found at mydhl.com has always been called "My Democracy Has Losers," and has always only displayed photographs of, and commentary on, American elected officials.

The domain has never generated money for the Respondent. See **Respondent's Declaration at 2**, ¶ **9**. Additionally, the domain has never been for sale. See Respondent's Declaration at 2, ¶ **9**.

Complainant has offered neither direct nor circumstantial evidence of the Respondent's bad faith registration or use of the domain. In fact, the record is so void of such evidence that the Complainant attempts to characterize the Respondent's failure to reply to the Complainant's demand letter as evidence of bad faith. See Complaint at 14.

The Complainant is grasping at straws on this issue. The Respondent recently changed offices, and thus never actually received the demand letter. See Respondent's Declaration at 3, ¶ 15. Nevertheless, let us presume that he did. The demand was sent on December 23, 2009 – a date when most of Western Civilization is not paying great attention to its fax machines. In fact, the Panel should take notice of the fact that very little work gets done between December 24 and January 1 anywhere in the Western World. The day after the complaint was sent was Christmas Eve, followed by the Christmas Holiday. The week between Christmas and New Year's Day intervened, and then the following Tuesday, the Complainant sent its complaint – which it must have been working on over the holiday.

If the Complainant's counsel works for Mr. Scrooge, the Respondent offers his condolences. However, to expect a person to receive a demand letter (recalling that the Respondent did not even receive it), evaluate his position, interview attorneys, gather money to pay attorneys, and then compose a response in a mere two weeks – let alone <u>those</u> two weeks – is patently unreasonable. For a complainant to attempt to call this "evidence" of bad faith reeks of desperation and betrays its positions' substantive weaknesses.

Perhaps in the Complainant's world, Mr. White would receive the letter, and tell his family "quick, turn down the Muppets Christmas album so that I can concentrate on this letter from some German lawyers!" Then, by the flickering fire of a burning Yule Log, with the scent of warm Christmas turkey wafting through the air, Mr. White would gather the children around the Christmas tree to hear his reading of the Complainant's demand letter – an instant Christmas classic, rivaling Dickens – attempting to bully Mr. White into giving up his right to political speech.

Yes, perhaps in some parallel universe, that would happen. In this one, the complainant should be ashamed of itself.

### CONCLUSION

Respondent has exhibited none of the behavior typical of true cybersquatters, such as providing false contact information or a privacy service, attempting to auction off the domain name, or offering evasive or unbelievable explanations for their behavior. Respondent has never before been a respondent in a Policy proceeding. **See Respondent's Declaration at 2, ¶ 10.** There is no Pay-Per-Click site at the respondent is not a cybersquatter.

The UDRP requires that the Complainant demonstrate bad faith use and bad faith registration. There is an absence of both elements, and thus the Complaint must fail. As the learned Panel stated in Chivas USA Enterprises, LLC, et al. v. Cesar Carbajal, WIPO Case No. D2006-0551:

The Policy was not designed to be used as broadside Internet trademark protection. Rather it was designed as an expedited means to redress only "abusive, bad faith cyber squatting." As Complainants bear the burden of proof, "[i]n a close case, the panel should lean toward the Respondents' view of things." eCrush.com, Inc. v. Cox, Davis & Simpsom, LLC, Mr. Ken Cox, Mr. Brian Simpson, Mr. Ron Davis, WIPO Case. No. D2004-0552 (citing Interstate National Dealer Services, Inc. v. Selwyn Colley, WIPO Case No. D2003-0934; Rug Doctor, L.P. v. Barry Bourdage, WIPO Case No. DTV2003-0002).

This dispute, however, is not even remotely classifiable as a "close case." The Complainant has barely taken the field, let alone advanced the ball. This complaint must fail.

### Administrative Panel

(Rules, paras. 5(b)(iv) and (b)(v) and para. 6; Supplemental Rules, para. 7)

The Respondent accepts the Complainant's decision to have this matter resolved by a single member panel.

### Other Legal Proceedings

(Rules, para. 5(b)(vi))

None.

### **Communications**

(Rules, paras. 2(b), 5(b)(vii); Supplemental Rules, para. 3)

A copy of this Response has been sent or transmitted to the Complainant on January 21, 2010 by email to Complainant's attorney, Gabriele Engels via email to Engels@jonas-lawyers.com.

This Response is submitted to the Center in electronic form only, as stipulated to by the parties.

### <u>Certification</u>

(Rules, para. 5(b)(viii), Supplemental Rules, para. 12)

The Respondent agrees that, except in respect of deliberate wrongdoing, an Administrative Panel, the World Intellectual Property Organization and the Center shall not be liable for any act or omission in connection with the administrative proceeding.

The Respondent certifies that the information contained in this Response is to the best of the Respondent's knowledge complete and accurate, that this Response is not being presented for any improper purpose, such as to harass, and that the assertions in this Response are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

### Annex A D2010-0016





Before their political "marriage."



A bit too comfortable



adoring babble



Ms. (Mr.?) Clinton

Political Speech, brought to you by a free country, and a constitution, unequalled in all of recorded history.

### Annex B D2010-0016

### WORLD INTELLECTUAL PROPERTY ORGANIZATION ARBITRATION AND MEDIATION CENTER

DHL Operations, B.V. DHL International, GmbH **Complainants** 

٧.

### Disputed Domain Name: mydhl.com

## Eric J. White **Respondent**

### **DECLARATION OF RESPONDENT**

1. The undersigned, being warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, declares that he is qualified to make all statements herein from his own personal knowledge.

2. My legal name is Eric J. White. I am an adult over the age of 18 years, and I am otherwise competent to make all of the statements in this Declaration.

3. I registered the domain name mydhl.com as an acronym for "My Democracy Has Losers."

4. I had hoped to piggyback "My Democracy Has Losers" (The democratic party being referred to in that manner by much of the Republican Talk radio media), to a successful political satire website. As a past political candidate myself, and a future successfully elected candidate, I hoped to use this as a tool to promote the party line. Unfortunately, the domain "MyDemocracyHasLosers.com is a bit long, so I shortened it to a much shorter acronym, "MyDHL.com"

5. I did not have the shipping company DHL in mind when I registered this domain name.

1

6. I have had plans to launch a larger website where political commentary would be found. I had also intended to produce a political chat board on the website by using vBulletin.com, but the programming for this software has been, unfortunately, daunting for me.

7. Unfortunately, I have not had time to bring my political statement website to its full fruition.

8. Nevertheless, every so often, I have updated the website with more images of American politicians with whom I disagree, along with captions mocking them.

9. I have never placed an advertisement on the website at mydhl.com, nor have I ever offered to sell the domain to anyone.

10. I have never been a Respondent in a UDRP action before.

11. I still would like to expand the website, but it does get my message across. I believe that the American politicians depicted on this website are "losers," and that they cause our democracy to malfunction. I have placed regular captions under the photos, and I feel that these captions make a poignant political statement.

12. I have attached historical screen shots of my website found at mydhl.com to the Response in this case. These historical screen shots are true and correct representations of what the website has looked like since its inception. However, some of the photos are missing, as the internet archive does not preserve images. That said, none of the images were ever of shipping companies or anything of the like – they were all, at all times, pictures of political figures.

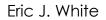
13. As the Panel can see, the way the site is used today is the same way that the website has been used since its inception.

14. The only interruptions in this use have been brief outages when my web hosting provider was down, or in the process of being changed.

2

15. I recently changed office locations, and thus my fax machine has not been operational. I never received the demand from the Complainant until it was provided to me (half of it anyway) as an exhibit to the Complaint.

16. Signed this 19<sup>th</sup> Day of January, 2010



## Annex C D2010-0016

mrandazza Logout | My Account

aceroute My IP Address	Domain Parking		p Domain Name Regi		Bulk Check		n Typo Generator	
Power Tools: Reverse I	P Domain History	Mark Alert	Name Server Spy	Hosting Hist	ory Registr	ant Search	Registrant Alert	
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## Annex D D2010-0016

#### mrandazza Logout | My Account

Whois	Domain Search	Dom	ain Suggestions	For Sale	Sales History	Auction Search	Domain Monito	r Domain Dir	rectory
Ping Tr	raceroute My I	P Address	Domain Parking	Chea	p Domain Name Regis	tration Bull	k Check Domain	Typo Generator	more>
· [							Registrant Search	Registrant Alert	1 .

### Domain History for mydhl.com

Enter a domain name to get its history						
Domain Name:	mydhl.com	Search				

#### 85 records found for mydhl.com

#### Red links are a privacy protected record Similar records are grouped by background color

	Similar res	cordo dre grod	рец ву васку		
1999	2005	2007	2008	2009	2010
<u>1999-05-28</u>	<u>2005-09-18</u>	<u>2007-06-29</u>	<u>2008-03-01</u>	<u>2009-03-03</u>	<u>2010-01-06</u>
			<u>2008-06-04</u>	<u>2009-03-18</u>	<u>2010-01-07</u>
			<u>2008-06-16</u>	<u>2009-03-19</u>	<u>2010-01-08</u>
			<u>2008-06-29</u>	<u>2009-03-24</u>	<u>2010-01-11</u>
			<u>2008-07-26</u>	<u>2009-03-27</u>	<u>2010-01-13</u>
			<u>2008-10-07</u>	<u>2009-03-31</u>	
			<u>2008-12-21</u>	<u>2009-04-01</u>	
				<u>2009-04-02</u>	
				<u>2009-04-03</u>	
				<u>2009-04-06</u>	
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				<u>2009-04-14</u>	
				<u>2009-04-22</u>	
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				<u>2009-04-28</u>	
				<u>2009-05-14</u>	
				<u>2009-05-27</u>	
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				<u>2009-06-30</u>	
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				<u>2009-10-23</u>	
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2009-11-05 2009-11-07 2009-11-16 2009-11-17 2009-11-18 2009-11-20 <u>2009-11-21</u> 2009-11-23 2009-11-24 2009-11-25 2009-11-26 2009-11-27 2009-11-30 2009-12-01 2009-12-02 2009-12-08 2009-12-11 2009-12-14 2009-12-15 2009-12-17 2009-12-19 2009-12-20 2009-12-23 <u>2009-12-28</u> 2009-12-29 2009-12-30 2009-12-31 **Discontinue this Unit Service** 

Memberships | Support | Registrant Search | Whois | Desktop Tools | Stock Ticker | Blog | Site Map

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## Annex E D2010-0016

Username/Customer #
Password
<b>Welcome E J!</b> Sign Out
24/7 Sales & Support (480) 505-8877 24/7 Sales & Support 020 7979 2661 24/7 Sales & Support 34 912 754 878 24/7 Sales & Support 02 8023 8592
<u>Create Account</u>   <u>Forgot Password</u>   <u>Sign Out</u>
<ul> <li><u>35 Domains Expiring</u></li> <li><u>Deals of the Day</u></li> </ul>
USD
empty
<ul> <li>HOME</li> <li>Domain Auctions</li> <li>Marketplace</li> <li>Support &amp; Community</li> <li>Media</li> <li>Bob's Video Blog</li> <li>My Account</li> </ul>

- Site Search Domain Name Search Marketplace Product Search Marketplace Business Search
- Start Domain Search

Account Settings My Products My Renewals My Upgrades

### • E J WHITE

Customer Number: 277996PIN: \*\*\*\*
 Update Security Settings
 Contact Support
 Search For Receipts
 Account Alerts (3) View All
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The second second

Order History <u>Google® Ad Credits</u> <u>Receipt Date Amount</u> # <u>8150382</u> 9/23/2003 \$31.00

DATE: 9/23/2003 11:07:36 AM

Customer #: 277996 Billing Information

-- Printable Version --Receipt#: 8150382

CashParking® Discount Domain Club Domain Appraisals

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Management Web Site Tools For Sale/Starter Web Page Advertising Credits: MySpace®, Google®, Facebook®	170-1	.COM Bulk Domain Name Transfer (1-49) Domain: mydhl.com * To manage your domain names please go	GoDaddy.com to your <u>"Manage I</u>		\$7.75 <u>6"</u> page.	3	\$.00	\$23.25	
Information Gift Card Balance GoodAsGold Balance Domain Related Domain Transfers Investor's Edge Domains Domain Forwarding Domain Monitoring/Backordering Off-Site DNS	<u>Label</u> 12040-1	Name .NET Bulk Domain Name Transfer (1-49) <i>Domain: vrsextoys.net</i> * To manage your domain names please go	<u>Attributes</u> GoDaddy.com to your <u>"Manage  </u>	<u>Price</u> \$7.75	<u>Today's</u> <u>Price</u> \$7.75 • <u></u> page.	<u>Qtv</u> 1	<u>Extra</u> <u>Disc.</u> \$.00	<u>Total</u> <u>Price</u> \$7.75	
Preferences Account Settings Customer Information Order History Pending Account Changes My Downloads Assign an AccountExee Buyer Profiles My Payment			Name: Paid: (\$31.00) CC Number:	)					
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