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| *[Name & Address of Complainant]* | **Domain Name(s)****in Dispute:**<enter domain name(s) here> |
| **(Complainant)** |
| v. |
| *[Name and Address of Respondent]* |
| **(Respondent)** |

# COMPLAINT IN ACCORDANCE WITH

**THE .NYC NEXUS DISPUTE RESOLUTION POLICY**

[1.] This Complaint is hereby submitted for decision in accordance with the nycNexus Dispute Resolution Policy (“Policy” or “nycNDP”) and Rules (“Rules”), adopted by the City of New York and Neustar, and the Forum’s Supplemental Rules (Rules). nycNDP Rule 3(b)(i).

[2.] **COMPLAINANT INFORMATION**

[a.] Name: *[enter full name of Complainant]*

 [b.] Address: *[enter mailing address]*

 [c.] Telephone: *[enter telephone number]*

 [d.] Fax: *[enter facsimile number]*

 [e.] E-Mail: *[enter e-mail address(es)]*

[3.]  **COMPLAINANT AUTHORIZED REPRESENTATIVE, IF ANY**

[a.] Name: *[enter full name of Representative(s)]*

 [b.] Address: *[enter mailing address]*

 [c.] Telephone: *[enter telephone number(s)]*

 [d.] Fax: *[enter facsimile number]*

 [e.] E-Mail: *[enter e-mail address(es)]*

 Rule 3(b)(ii).

Complainant’s preferred contact person for correspondence relating to this case:

 [a.] Contact Name(s): *[enter name(s) of contact persons]*

 [b.] Contact Emails(s): *[enter email address(es) to receive all case emails]*

Rule 3(b)(iii).

 [4.] **RESPONDENT INFORMATION—**Registrant from the Whois Record

[a.] Name:  *[enter full name of Registrant/Respondent]*

[b.] Address: *[enter mailing address]*

[c.] Telephone: *[enter telephone number]*

[d.] Fax: *[enter facsimile number]*

[e.] E-Mail: *[enter e-mail address]*

[5.] **RESPONDENT AUTHORIZED REPRESENTATIVE, IF KNOWN**

[a.] Name: *[enter full name of Representative(s)]*

 [b.] Address: *[enter mailing address]*

 [c.] Telephone: *[enter telephone number(s)]*

 [d.] Fax: *[enter facsimile number]*

 [e.] E-Mail: *[enter e-mail address(es)]*

Rule 3(b)(v)

[6.] **ANY ADDITIONAL CONTACT INFORMATION FOR RESPONDENT**

 [a.] Name: *[enter full name]*

 [b.] Address: *[enter mailing address]*

 [c.] Telephone: *[enter telephone number(s)]*

 [d.] Fax: *[enter facsimile number]*

 [e.] E-Mail: *[enter e-mail address(es)]*

Rule 3(b)(v).

[7.] **DOMAIN NAMES**

List all of the domain names that are the subject of the dispute.

Rule 3(b)(vi).

[8.] **REGISTRAR INFORMATION**

List the Registrar with which each domain name listed in #7 is registered.

Rule 3(b)(vii).

[9.] **PANEL SELECTION**

Complainant elects to have this dispute heard by a:

\_\_\_\_\_single member panel

\_\_\_\_\_ three member panel. (If checked, list three candidates from the Forum’s list below)

1.

2.

3.

Rule 3(b) (iv)

[10.] **DESCRIPTION OF THE DISPUTE**

Provide a statement of the grounds upon which the Complaint is based setting for facts showing the complainant is entitled to relief under Policy Para. 3.

*[provide arguments here]*

Rule 3(b)(viii).

[11.] **EVIDENCE**

Annex any copies of any documents that the Complainant considers to evidence its basis for relief. It’s the burden of Complainant to ***prove*** its case. Mere allegations are insufficient.

Rule 3(b)(xiii), Supp. Rule 4, and the Annex to the Supp. Rules.

[12.] **OTHER LEGAL PROCEEDINGS**

[Identify any other legal proceedings that have been commenced or terminated in connection with or relating to any of the domain name(s) or parties that are the subject of the complaint.] Rule 3(b)(ix).

[13.] **MUTUAL JURISDICTION**

State that complainant will comply with any challenges to a decision in the administrative proceeding to the jurisdiction of the courts in at least one specified Mutual Jurisdiction.

Rule 3(b)(ix) and Rule 1 (“Mutual Jurisdiction”).

[14.] **CERTIFICATIONS**

Provide a certification that the Complaint does not exceed 10 pages.

Supplemental Rule 4(a).

Provide this statement: “Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute’s resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) the Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar(s), and (c) the registry administrator (Neustar), and (d) the Internet Corporation for Assigned Names and Numbers, and (e) the City of New York, as well as their directors, officers, employees, and agents.

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

Rule 3(b)(xi).

* **I understand that filing fees are non-refundable. Rule 17.**
* **I understand that my case may be dismissed for failing to properly comply with deadlines or other formalities. Rule 4(c).**

Respectfully Submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Signature]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Name]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[Date]

[The Complaint and Annexes shall be submitted electronically, in accordance with the electronic submission requirements listed in the Annex to the Rules, via the online filing site at <http://domains.adrforum.com> or via email to domaindispute@adrforum.com. The filing fee must accompany the Complaint or the Complaint may be rejected. Filing fees are not refundable.]