

FORM A

COMPLAINT IN ACCORDANCE WITH THE DOMAIN NAME DISPUTE RESOLUTION POLICY

This form shall be used to apply to Hong Kong International Arbitration Centre (HKIAC) pursuant to the Domain Name Dispute Resolution Policy, adopted by the Hong Kong Domain Name Internet Registration Corporation Limited (HKIRC) on 22 February 2011 (the Dispute Resolution Policy), the HKIRC Domain Name Dispute Resolution Policy Rules of Procedure, approved by HKIRC on 22 February 2011 (the Rules of Procedure) and the HKIAC Supplemental Rules effective from 1 March 2011.

(Note: In case any section of the form is not applicable, please put in N/A)

(Note: If there is insufficient space, provide details on a separate sheet in the same format)

1 DISPUTED DOMAIN NAME (name to be listed in full)

2 INDICATE THE REGISTRAR WITH WHICH THE DOMAIN NAME IS REGISTERED INCLUDING ITS FULL CONTACT DETAILS :

3 DETAILS OF PARTIES : *(If there is more than one Complainant/Respondent, provide the contact details for each and briefly describe the bases on which they are being joined in a common Complaint)*

COMPLAINANT:

RESPONDENT:

Name _____

Name _____

Address _____

Address _____

Tel No _____

Tel No _____

Fax No _____

Fax No _____

Email _____

Email _____

Legal Status _____

Legal Status _____

Place of Incorporation _____

Place of Incorporation _____

Business Registration Number _____

Business Registration Number _____

(attach a copy of the Registration)

(attach a copy of the Registration)

Registered Office _____

Registered Office _____

Authorised Representative (if any):

Authorised Representative (if Known):

Name _____

Name _____

Address _____

Address _____

Tel No _____

Tel No _____

Fax No _____

Fax No _____

Email _____

Email _____

4 INDICATE REASONS WHY THE PERSON / ENTITY IDENTIFIED AS THE RESPONDENT HAS BEEN SO IDENTIFIED: (All supporting documents and evidence should be attached to this application with an index therefore.)

5 COMPLAINT: (specify the trademark(s) or service mark(s) on which the Complaint is based and, for each mark, describe the goods or services, if any, in connection with which the mark is used. Attach copies of all supporting documents and an index therefore.)

6 SUMMARISE BRIEFLY THE FACTUAL AND LEGAL GROUNDS ON WHICH THE COMPLAINT IS MADE:
(word limit shall be 3,000 words maximum).

7 REMEDIES SOUGHT :

8 THE COMPLAINANT ELECTS TO HAVE THE COMPLAINT DECIDED BY A PANELIST(S) OF ONE/THREE * :
(* delete as appropriate)

9 PROPOSED PANELIST(S) IF THE COMPLAINANT ELECTS A PANEL OF THREE: (must be on the HKIAC's list of Panelists. List in preference.)

1. _____
2. _____
3. _____

10 REGISTRATION AGREEMENT IN REGARDS TO THE DOMAIN NAME: (attached a copy to this application)

11 OTHER RELEVANT DETAILS

12 ADDITIONAL INFORMATION

- (i) Annex any additional documentary or other evidence to support the Complaint, together with a schedule indexing such document(s).
- (ii) The Complaint may only relate to one domain name.
- (iii) This Complaint shall be submitted in electronic form to (refer to Article 3 of the Supplemental Rules) :-

Hong Kong International Arbitration Centre
Attention: Case Administrator
Email : hkdomain@hkiac.org

- (iv) Enclose the appropriate fees in accordance with Article 15 of the HKIAC Supplemental Rules.
- (v) The following documents should be consulted in connection with preparing this complaint:
 - HKIRC Domain Name Dispute Resolution Policy (the “Dispute Resolution Policy”);
 - HKIRC Domain Name Dispute Resolution Policy Rules of Procedure (the “Rules of Procedure”);
 - HKIAC Supplemental Rules for HKIRC Domain Name Dispute Resolution Policy (“the HKIAC Supplemental Rules”)

13 CERTIFICATE

The Complainant, by submitting the Complaint agrees to the settlement of the dispute, regarding the domain name which is the object of the Complaint by final and binding arbitration in Hong Kong in accordance with the HKIRC Domain Name Dispute Resolution Policy, HKIRC Domain Name Dispute Resolution Policy Rules of Procedure and the Hong Kong International Arbitration Centre Supplementary Rules.

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 Hong Kong International Arbitration Centre as well as their directors, officers, employees, and agents and the arbitration Panelist(s) who will hear the dispute, except in the case of fraud or dishonesty or deliberate wrongdoing, (b) the Registrar, (c) the registry administrator, and (d) the HKIRC, as well as their directors, officers, employees, and agents.

The Complainant by submitting this Complaint agrees that the decision of the Arbitration Panel to be appointed in this matter may be made public and may be published on the website including without limitation other forms of publication of the HKIRC and or the Hong Kong International Arbitration Centre who shall appoint the Arbitration Panel in question.

The Complainant certifies that the information contained in this Complaint is to the best of the Complainant'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 the

Rules of Procedure and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

(Signed) _____ Date: _____

Name and Capacity _____