



Rural Route 3 Holdings, LP  
200 Dorado Beach Drive,  
Dorado Puerto Rico 00646 US  
Complainant,

v.

Patrick de Man  
544 Corredor del Bosque,  
Dorado PR 00646 US  
Respondent.

**Domain Name In Dispute:**  
*ruralroute3.holdings*

**File Number:**  
*FA1707001739477*

**AMENDED COMPLAINT IN ACCORDANCE WITH  
THE UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY**

[1.] This Amended Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (UDRP), adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999, and the Rules for Uniform Domain Name Dispute Resolution Policy (UDRP Rules), with an effective date of July 31, 2015, and the FORUM's Supplemental Rules (Supp. Rules). UDRP Rule 3(b)(i). See **Exhibit A**, Uniform Domain Name Dispute Resolution Policy (UDRP).

**[1.] COMPLAINANT INFORMATION**

[a.]	Name:	Rural Route 3 Holdings, LP
[b.]	Address:	200 Dorado Beach Drive, Dorado Puerto Rico 00646 US
[c.]	Telephone:	+1.9795757026
[d.]	Fax:	N/A
[e.]	E-Mail:	barry.hammond@gmail.com

The following representatives are authorized to act for the Complainant in the administrative proceeding pursuant to ICANN Rule 3(b)(ii):

[a.]	Name:	David A. W. Wong, T. Joseph Wendt
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[b.] Address: Barnes & Thornburg LLP  
11 S. Meridian St  
Indianapolis, Indiana 46204-3535  
[c.] Telephone: 317-236-1313  
[d.] Fax: 317-231-7433  
[e.] Email: [dwong@btlaw.com](mailto:dwong@btlaw.com),  
[jwendt@btlaw.com](mailto:jwendt@btlaw.com)

The Complainant's preferred method for communications directed to the Complainant in the administrative proceeding is by e-mail and facsimile to its undersigned attorney; ICANN Rule 3(b)(iii).

**Electronic-Only Material**

[a.] Method: email  
[b.] Address: [dwong@btlaw.com](mailto:dwong@btlaw.com),  
[jwendt@btlaw.com](mailto:jwendt@btlaw.com)  
[c.] Contact: David A. W. Wong,  
T. Joseph Wendt

**Material Including Hard Copy**

[a.] Method: fax  
[b.] Address/Fax: 317-231-7433  
[c.] Contact: David A. W. Wong,  
T. Joseph Wendt

The Complainant chooses to have this dispute heard before a **single member** administrative panel. ICANN Rule 3(b)(iv).

[2.] **RESPONDENT INFORMATION**

[a.] Name: Patrick de Man  
[b.] Organization: N/A  
[c.] Address: 544 Corredor del Bosque, Dorado PR 00646 US  
[d.] Telephone: +1.9392403510  
[e.] Fax: N/A  
[f.] E-Mail: [pat.deman@gmail.com](mailto:pat.deman@gmail.com)

[3.] **DOMAIN NAME(S)**

[a.] The following domain name is the subject of this Complaint (hereinafter, the "Disputed Domain Name"): ICANN Rule 3(b)(vi).

**ruralroute3.holdings**

[b.] Registrar Information: ICANN Rule 3(b)(vii).

[i.] Registrar's Name: Google Inc.  
[ii.] Registrar Address: N/A  
[iii.] Telephone Number: +1.8772376466  
[iv.] E-Mail Address: [registrar-abuse@google.com](mailto:registrar-abuse@google.com)

[c.] Trademark/Service Mark Information: ICANN Rule 3(b)(viii).

Complainant is the owner of, and has rights to:

Common Law Trademark Rights: RURAL ROUTE 3 HOLDINGS  
First use Date: since at least as early as 2012  
Services: financial and capital investment services

[4.] **FACTUAL AND LEGAL GROUNDS**

This Amended Complaint is based on the following factual and legal grounds; ICANN Rule 3(b)(ix).

[a.] **The Disputed Domain Name is confusingly similar and identical to the RURAL ROUTE 3 HOLDINGS trademark. ICANN Rule 3(b)(ix)(1); ICANN Policy ¶ 4(a)(i).**

[i.] Rural Route 3 Holdings, LP (“Complainant”) has been using the RURAL ROUTE 3 HOLDINGS trademark and trade name (together, the “RURAL ROUTE 3 HOLDINGS Mark”) since at least as early as 2012 in connection with providing financial and capital investment services to others. The RURAL ROUTE 3 HOLDINGS Mark as applied to capital venture services is arbitrary and in inherently distinctive.

[ii.] In furtherance of its services, Complainant registered the ruralroute3holdings.com domain name on April 20, 2016 (the “Rural Route 3 Holdings Domain Name”) and openly and regularly uses the Rural Route 3 Holdings Domain Name for sending and receiving email communications. *See Exhibit B*: a printout of the WHOIS information for the Rural Route 3 Holdings Domain Name.

[iii.] As a result of the excellence of Complainant’s services and the widespread association of the RURAL ROUTE 3 HOLDINGS Mark with Complainant in the minds of the public, Complainant has established common law trademark rights in the RURAL ROUTE 3 HOLDINGS Mark.

[iv.] Respondent has since registered the ruralroute3.holdings domain name on June 22, 2017 (the “Disputed Domain Name”), a domain name that is identical to Complainant’s trademark, company and trade name, and the Rural Route 3 Holdings Domain Name. *See Exhibit C*: a printout of the WHOIS information for the Disputed Domain Name.

[v.] Complainant has established common law trademark rights in the RURAL ROUTE 3 HOLDINGS Mark well prior to the date on which Respondent registered the Dispute Domain Name. Panels have routinely held that a complainant can establish rights in a mark through continuous and exclusive use of the mark in commerce, and that a mark need not be registered with a trademark authority. *See Oculus VR, LLC v. Ivan Smirnov*, FA 1625898 (Forum July 27, 2015) (“A Complainant does not need to hold registered trademark rights in order to have rights in a mark under Policy ¶ 4(a)(i) and it is well established that a Complainant may rely on common law or unregistered trademarks that it can make out.”).

[vi.] For the reasons and authorities provided above, the Disputed Domain Name is confusingly similar and identical to the RURAL ROUTE 3 HOLDINGS Mark.

[b.] **Respondent has no rights or legitimate interest in the Disputed Domain Name. ICANN Rule 3(b)(ix)(2); ICANN Policy ¶ 4(a)(ii).**

[i.] Respondent registered the Disputed Domain Name to generate email designed to confuse and deceive others into believing Respondent is affiliated with Complainant, an activity that panels have determined not to be a *bona fide* offering of goods or services or a legitimate noncommercial or fair use. *See Am. Int'l Group, Inc. v. Busby*, FA 156251 (FORUM May 30, 2003) (finding that the respondent attempts to pass itself off as the complainant online, which is blatant unauthorized use of the complainant's mark and is evidence that the respondent has no rights or legitimate interests in the disputed domain name); *see also Abbott Laboratories v. Miles White*, FA 1646590 (FORUM Dec. 10, 2015) (finding use of the disputed domain name to impersonate an executive of Complainant was not a *bona fide* offering or legitimate noncommercial or fair use under Policy ¶ 4(c)(i) or 4(c)(iii)). Accordingly, Respondent's attempt to masquerade as an agent of Complainant is not within uses allowable under Policy ¶¶ 4(c)(i) or 4(c)(iii). Attached as **Exhibit D** is an email string from June 23, 2017 in which Respondent sent a communication asking the recipient to "[p]lease note my new email address" and copying the general counsel of Complainant, Barry Hammond, using his `Barry@ruralroute3holdings.com` email address and Respondent's new email address `patrick@ruralroute3.holdings` (*emphasis added*). From this, there can be no doubt that Respondent (1) was aware of Complainant's prior trademark rights to the RURAL ROUTE 3 HOLDINGS Mark; and (2) is seeking to confuse and deceive others into believing Respondent is affiliated with Complainant.

[ii.] The WHOIS Information (*See Exhibit C*) identifies the registrant of the Disputed Domain Name as "Patrick de Man." Because Respondent is clearly not known by the Disputed Domain Name, the burden must shift to Respondent to show that it has been known by the Disputed Domain Name. *See M. Shanken Commc'ns v. WORLDTRAVELERSONLINE.COM*, FA 740335 (NAF Aug. 3, 2006) (finding, based on the relevant WHOIS information and other evidence in the record, that a UDRP respondent was not commonly known by the <cigaraficionada.com> domain name and so failed to show that it had rights to or legitimate interests in that domain name as provided in Policy ¶ 4(c)(ii)); *see also Wal-Mart Stores, Inc. v. Power of Choice Holding Co.*, FA0601000621292 (NAF Feb. 16, 2006) (finding Respondent does not have rights or legitimate interests in the domain names <wallmartwholesale1.com>, <wallmartwholesale2.com> and <wallmartwholesale3.com> pursuant to UDRP ¶ 4(c)(ii)); *see also Gallup, Inc. v. Amish Country Store*, FA 96209 (NAF Jan. 23, 2001); *see also RMO, Inc. v. Burbridge*, FA 96949 (NAF May 16, 2001) (interpreting Policy ¶ 4(c)(ii) "to require a showing that one has been commonly known by the domain name prior to registration of the domain name to prevail.").

[iii.] For the reasons and authorities provided above, Respondent has no legitimate interests in the Disputed Domain Name.

[c.] **Respondent registered and is using the Disputed Domain Name in bad faith. ICANN Rule 3(b)(ix)(3); ICANN Policy ¶ 4(a)(iii).**

[i.] As indicated above, Respondent is well aware of Complainant's use and claim of rights to the RURAL ROUTE 3 HOLDINGS Mark. In fact, Respondent participates in investments with Complainant, as evidenced by **Exhibit D**, and is a former employee of an entity that is 99% owned by Complainant ("Complainant Subsidiary"). Respondent registered the Disputed Domain Name after

acrimoniously separating from the Complainant Subsidiary and after initiating litigation against the Complainant Subsidiary on unrelated issues. Furthermore, Respondent communicated with Complainant's general counsel via the general counsel's Barry@ruralroute3holdings.com email address when announcing to a third party that Respondent had adopted the new email address patrick@ruralroute3.holdings. Accordingly, there can be no doubt that Respondent was aware and had actual knowledge of Complainant's RURAL ROUTE 3 HOLDINGS Mark prior to registration of the Disputed Domain Name. Registration of a disputed domain name with knowledge of Complainant's rights creates a presumption of bad faith registration and use with regard to Policy ¶ 4(a)(iii). See *Samsonite Corp. v. Colony Holding*, FA 94313 (Nat. Arb. Forum April 17, 2000) (evidence of bad faith includes actual or constructive knowledge of commonly known mark at time of registration); see also *Digi Int'l. v. DDI Sys.*, FA 124506 (Nat. Arb. Forum Oct. 24 2002) (holding that "there is a legal presumption of bad faith, when Respondent reasonably should have been aware of Complainant's trademarks, actually or constructively."); see also *Bluegreen Corp. v. eGo*, FA 128793 (Nat. Arb. Forum Dec. 16, 2002) (finding bad faith where the method by which the respondent acquired the disputed domain names indicated that the respondent was well aware that the domain names incorporated marks in which the complainant had rights).

[ii.] Upon information and belief, Respondent intends to use the Disputed Domain Name to send correspondence to others from the patrick@ruralroute3.holdings email address for the purpose of confusing and deceiving others as to a relationship between Complainant and Respondent. Numerous UDRP panels have found such impersonation to constitute bad faith, even if the relevant domain names are used only for email. See *Smiths Group plc v. Snooks*, FA 1372112 (Nat. Arb. Forum Mar. 18, 2011) (finding that the respondent's attempt to impersonate an employee of the complainant was evidence of bad faith registration and use under Policy ¶ 4(a)(iii)); see also *Guaranty Bank v Regsterfly.com*, FA 586864 (Nat. Arb. Forum Dec. 6, 2005) (concluding that respondent's attempts to pass itself off as the complainant by creating fraudulent email accounts is evidence that a respondent registered the disputed domain name in bad faith).

[iii.] Finally as further evidence of bad faith, Respondent has demonstrated his willingness to harm others through improper use of their property. Specifically, he improperly retains the Complainant Subsidiary's property and once locked the Complainant Subsidiary's employees out of the Complainant Subsidiary's own computer system at a time calculated to inflict maximum harm on Complainant Subsidiary and then attempted to ransom Complainant Subsidiary's access to its own system and information for one million dollars.

[iv.] For the reasons and authorities provided above, Respondent has registered and is using the Disputed Domain Name in bad faith.

#### [5.] REMEDY SOUGHT

The Complainant requests that the Panel issue a decision that the registrations of the Disputed Domain Name be transferred to Complainant. ICANN Rule 3(b)(x); ICANN Policy ¶ 4(i).

#### [6.] OTHER LEGAL PROCEEDINGS

Pursuant to ICANN Rule 3(b)(xi), Complainant submits that the federal complaint attached as **Exhibit E** has been filed by Complainant against Respondent.

**[7.] COMPLAINT TRANSMISSION**

The Complainant asserts that a copy of this Complaint, has been sent or transmitted to the Respondent (domain-name holder), in accordance with ICANN Rule 2(b), ICANN Rule 3(b)(xii); NAF Supp. Rule 4(c). In addition, the Complainant certifies that a copy of this Complaint has been sent or transmitted to the registrar for the Disputed Domain Name in accordance with NAF Supp. Rule 4(e)(i).

**[8.] MUTUAL JURISDICTION**

The Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the Disputed Domain Name, to jurisdiction in the location of the principal office of the registrar of the Disputed Domain Name. ICANN Rule 3(b)(xiii).

**[9.] CERTIFICATION**

Complainant agrees that its claims and remedies concerning the registration of the Disputed 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 National Arbitration Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

Complainant certifies that the information contained in this Complaint is to the best of 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 these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

RESPECTFULLY SUBMITTED this 19<sup>th</sup> day of July, 2017.

Respectfully Submitted,

BARNES & THORNBURG, LLP

/s/ David A. W. Wong  
David A. W. Wong  
T. Joseph Wendt  
Barnes & Thornburg, LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204  
Tel: 317-236-1313  
Fax: 317-231-7433  
Attorneys for Complainant

Schedule of Exhibited Evidence

- Exhibit A Uniform Dispute Resolution Policy for the Registrar of the Disputed Domain Name
- Exhibit B Printouts of the WHOIS information for the Rural Route 3 Holdings Domain Name
- Exhibit C Printouts of the WHOIS information for the ruralroute3.holdings Disputed Domain Name
- Exhibit D Correspondence from the Respondent copying a representative of the Complainant
- Exhibit E The federal complaint filed by Complainant against Respondent





# EXHIBIT A

## Uniform Domain Name Dispute Resolution Policy

(As Approved by ICANN on October 24, 1999)

**1. Purpose.** This Uniform Domain Name Dispute Resolution Policy (the "Policy") has been adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN"), is incorporated by reference into your Registration Agreement, and sets forth the terms and conditions in connection with a dispute between you and any party other than us (the registrar) over the registration and use of an Internet domain name registered by you. Proceedings under Paragraph 4 of this Policy will be conducted according to the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules of Procedure"), which are available at <http://www.icann.org/en/dndr/udrp/uniform-rules.htm>, and the selected administrative-dispute-resolution service provider's supplemental rules.

**2. Your Representations.** By applying to register a domain name, or by asking us to maintain or renew a domain name registration, you hereby represent and warrant to us that (a) the statements that you made in your Registration Agreement are complete and accurate; (b) to your knowledge, the registration of the domain name will not infringe upon or otherwise violate the rights of any third party; (c) you are not registering the domain name for an unlawful purpose; and (d) you will not knowingly use the domain name in violation of any applicable laws or regulations. It is your responsibility to determine whether your domain name registration infringes or violates someone else's rights.

**3. Cancellations, Transfers, and Changes.** We will cancel, transfer or otherwise make changes to domain name registrations under the following circumstances:

- a. subject to the provisions of Paragraph 8, our receipt of written or appropriate electronic instructions from you or your authorized agent to take such action;
- b. our receipt of an order from a court or arbitral tribunal, in each case of competent jurisdiction, requiring such action; and/or
- c. our receipt of a decision of an Administrative Panel requiring such action in any administrative proceeding to which you were a party and which was conducted under this Policy or a later version of this Policy adopted by ICANN. (See Paragraph 4(i) and (k) below.)

We may also cancel, transfer or otherwise make changes to a domain name registration in accordance with the terms of your Registration Agreement or other legal requirements.

### **4. Mandatory Administrative Proceeding.**

This Paragraph sets forth the type of disputes for which you are required to submit to a mandatory administrative proceeding. These proceedings will be conducted before one of the administrative-dispute-resolution service providers listed at [www.icann.org/udrp/approved-providers.htm](http://www.icann.org/udrp/approved-providers.htm) (each, a "Provider").

**a. Applicable Disputes.** You are required to submit to a mandatory administrative proceeding in the event that a third party (a "complainant") asserts to the applicable Provider, in compliance with the Rules of Procedure, that

(i) your domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and

(ii) you have no rights or legitimate interests in respect of the domain name; and

(iii) your domain name has been registered and is being used in bad faith.

In the administrative proceeding, the complainant must prove that each of these three elements are present.

**b. Evidence of Registration and Use in Bad Faith.** For the purposes of Paragraph 4(a)(iii), the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.

**c. How to Demonstrate Your Rights to and Legitimate Interests in the Domain Name in Responding to a Complaint.** When you receive a complaint, you should refer to Paragraph 5 of the Rules of Procedure in determining how your response should be prepared. Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate your rights or legitimate interests to the domain name for purposes of Paragraph 4(a)(ii):

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

**d. Selection of Provider.** The complainant shall select the Provider from among those approved by ICANN by submitting the complaint to that Provider. The selected Provider will administer the proceeding, except in cases of consolidation as described in Paragraph 4(f).

**e. Initiation of Proceeding and Process and Appointment of Administrative Panel.** The Rules of Procedure state the process for initiating and conducting a proceeding and for appointing the panel that will decide the dispute (the "Administrative Panel").

**f. Consolidation.** In the event of multiple disputes between you and a complainant, either you or the complainant may petition to consolidate the disputes before a single Administrative Panel. This petition shall be made to the first Administrative Panel appointed to hear a pending dispute between the parties. This Administrative Panel may consolidate before it any or all such disputes in its sole discretion, provided that the disputes being consolidated are governed by this Policy or a later version of this Policy adopted by ICANN.

**g. Fees.** All fees charged by a Provider in connection with any dispute before an Administrative Panel pursuant to this Policy shall be paid by the complainant, except in cases where you elect to expand the Administrative Panel from one to three panelists as provided in Paragraph 5(b)(iv) of the Rules of Procedure, in which case all fees will be split evenly by you and the complainant.

**h. Our Involvement in Administrative Proceedings.** We do not, and will not, participate in the administration or conduct of any proceeding before an Administrative Panel. In addition, we will not be liable as a result of any decisions rendered by the Administrative Panel.

**i. Remedies.** The remedies available to a complainant pursuant to any proceeding before an Administrative Panel shall be limited to requiring the cancellation of your domain name or the transfer of your domain name registration to the complainant.

**j. Notification and Publication.** The Provider shall notify us of any decision made by an Administrative Panel with respect to a domain name you have registered with us. All decisions under this Policy will be published in full over the Internet, except when an Administrative Panel determines in an exceptional case to redact portions of its decision.

**k. Availability of Court Proceedings.** The mandatory administrative proceeding requirements set forth in Paragraph 4 shall not prevent either you or the complainant from submitting the dispute to a court of competent jurisdiction for independent resolution before such mandatory administrative proceeding is commenced or after such proceeding is concluded. If an Administrative Panel decides that your domain name registration should be canceled or transferred, we will wait ten (10) business days (as observed in the location of our principal

office) after we are informed by the applicable Provider of the Administrative Panel's decision before implementing that decision. We will then implement the decision unless we have received from you during that ten (10) business day period official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) that you have commenced a lawsuit against the complainant in a jurisdiction to which the complainant has submitted under Paragraph 3(b)(xiii) of the Rules of Procedure. (In general, that jurisdiction is either the location of our principal office or of your address as shown in our Whois database. See Paragraphs 1 and 3(b)(xiii) of the Rules of Procedure for details.) If we receive such documentation within the ten (10) business day period, we will not implement the Administrative Panel's decision, and we will take no further action, until we receive (i) evidence satisfactory to us of a resolution between the parties; (ii) evidence satisfactory to us that your lawsuit has been dismissed or withdrawn; or (iii) a copy of an order from such court dismissing your lawsuit or ordering that you do not have the right to continue to use your domain name.

**5. All Other Disputes and Litigation.** All other disputes between you and any party other than us regarding your domain name registration that are not brought pursuant to the mandatory administrative proceeding provisions of Paragraph 4 shall be resolved between you and such other party through any court, arbitration or other proceeding that may be available.

**6. Our Involvement in Disputes.** We will not participate in any way in any dispute between you and any party other than us regarding the registration and use of your domain name. You shall not name us as a party or otherwise include us in any such proceeding. In the event that we are named as a party in any such proceeding, we reserve the right to raise any and all defenses deemed appropriate, and to take any other action necessary to defend ourselves.

**7. Maintaining the Status Quo.** We will not cancel, transfer, activate, deactivate, or otherwise change the status of any domain name registration under this Policy except as provided in Paragraph 3 above.

**8. Transfers During a Dispute.**

**a. Transfers of a Domain Name to a New Holder.** You may not transfer your domain name registration to another holder (i) during a pending administrative proceeding brought pursuant to Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded; or (ii) during a pending court proceeding or arbitration commenced regarding your domain name unless the party to whom the domain name registration is being transferred agrees, in writing, to be bound by the decision of the court or arbitrator. We reserve the right to cancel any transfer of a domain name registration to another holder that is made in violation of this subparagraph.

**b. Changing Registrars.** You may not transfer your domain name registration to another registrar during a pending administrative proceeding brought pursuant to Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded. You may transfer administration of your domain name registration to another registrar during a pending court action or arbitration, provided that the domain name you have registered with us shall continue to be subject to the proceedings

commenced against you in accordance with the terms of this Policy. In the event that you transfer a domain name registration to us during the pendency of a court action or arbitration, such dispute shall remain subject to the domain name dispute policy of the registrar from which the domain name registration was transferred.

**9. Policy Modifications.** We reserve the right to modify this Policy at any time with the permission of ICANN. We will post our revised Policy at <URL> at least thirty (30) calendar days before it becomes effective. Unless this Policy has already been invoked by the submission of a complaint to a Provider, in which event the version of the Policy in effect at the time it was invoked will apply to you until the dispute is over, all such changes will be binding upon you with respect to any domain name registration dispute, whether the dispute arose before, on or after the effective date of our change. In the event that you object to a change in this Policy, your sole remedy is to cancel your domain name registration with us, provided that you will not be entitled to a refund of any fees you paid to us. The revised Policy will apply to you until you cancel your domain name registration

# EXHIBIT B

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Showing results for: rnhkxruv2h4dngs.com

Contact Information

Registrar Contact	Admin Contact	Tech Contact
Name: Admin Contact	Name: Admin Contact	Name: Admin Contact
Organization: rnhkxruv2h4dngs.com	Organization: rnhkxruv2h4dngs.com	Organization: rnhkxruv2h4dngs.com
Address: 1234 Main St, Suite 567, City, State, ZIP	Address: 1234 Main St, Suite 567, City, State, ZIP	Address: 1234 Main St, Suite 567, City, State, ZIP
City: City	City: City	City: City
State: State	State: State	State: State
Country: Country	Country: Country	Country: Country
Phone: Phone	Phone: Phone	Phone: Phone
Fax: Fax	Fax: Fax	Fax: Fax
Email: Email	Email: Email	Email: Email

Showing results for: rnhkxruv2h4dngs.com

Registrar	Status
Name: Registrar	Name: Registrar
Organization: Registrar	Organization: Registrar
Address: Registrar	Address: Registrar
City: City	City: City
State: State	State: State
Country: Country	Country: Country
Phone: Phone	Phone: Phone
Fax: Fax	Fax: Fax
Email: Email	Email: Email

Showing results for: rnhkxruv2h4dngs.com

Important Dates

Creation Date: Date

Name Servers

ns1.example.com

Raw WHOIS Record

```

Domain Name: rnhkxruv2h4dngs.com
Registrar: Registrar
Creation Date: 2010-01-01T00:00:00Z
Expiration Date: 2011-01-01T00:00:00Z
Last Updated: 2010-01-01T00:00:00Z
Status: clientTransferProhibited
Name Server: ns1.example.com
Name Server: ns2.example.com
DNSSEC: unsigned
Registrar WHOIS Server: whois.registrar.com
Registrar URL: http://www.registrar.com
Registry Domain ID: D123456789-LROR
Registry Email: registrar@registry.com
Registry Phone: +1 555 123 4567
Registry Fax: +1 555 987 6543
Registry Website: http://www.registry.com

```

Showing results for: rnhkxruv2h4dngs.com

Showing results for: rnhkxruv2h4dngs.com





# EXHIBIT C

Showing results for: **192.168.1.1**

Showing results for: **192.168.1.1**  
(most relevant results)

### Contact Information

Registration Center	Admin Contact	Tech Contact
Name: <b>192.168.1.1</b> Email: <b>192.168.1.1@192.168.1.1</b> Phone: <b>192.168.1.1</b> Fax: <b>192.168.1.1</b> Address: <b>192.168.1.1</b>	Name: <b>192.168.1.1</b> Email: <b>192.168.1.1@192.168.1.1</b> Phone: <b>192.168.1.1</b> Fax: <b>192.168.1.1</b> Address: <b>192.168.1.1</b>	Name: <b>192.168.1.1</b> Email: <b>192.168.1.1@192.168.1.1</b> Phone: <b>192.168.1.1</b> Fax: <b>192.168.1.1</b> Address: <b>192.168.1.1</b>

Showing results for: **192.168.1.1**  
(most relevant results)

Showing results for: **192.168.1.1**

Registration	Status
192.168.1.1 192.168.1.1 192.168.1.1 192.168.1.1 192.168.1.1	192.168.1.1 192.168.1.1 192.168.1.1 192.168.1.1 192.168.1.1

Showing results for: **192.168.1.1**

Registration Dates	Name Server
192.168.1.1 192.168.1.1 192.168.1.1	192.168.1.1 192.168.1.1 192.168.1.1

### WHOIS Policy

ICANN WHOIS Policy

The ICANN WHOIS Policy is a set of rules that governs the operation of the WHOIS database. It is designed to ensure that the database is accurate, reliable, and secure. The policy also outlines the responsibilities of registrars and registrants.

The policy is divided into several sections, including:

- Registration
- Transfer
- Renewal
- Expiration
- Deletion
- Dispute Resolution
- Privacy
- Security
- Compliance

The policy is subject to periodic review and updates. Registrants should check the policy regularly to stay informed of any changes.

Showing results for: **192.168.1.1**

Showing results for: **192.168.1.1**

Microsoft Word

Microsoft Word is a word processing program that allows you to create, edit, and format text documents. It includes features such as spell checking, grammar checking, and a variety of templates. You can also insert images, tables, and other objects into your documents. Microsoft Word is available on Windows, Mac OS, and Linux operating systems.

NOTICE REGARDING THE TERMS OF USE

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Microsoft Word 2003

# EXHIBIT D

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**From:** Patrick de Man [<mailto:pat.deman@gmail.com>]  
**Sent:** Friday, June 23, 2017 1:54 PM  
**To:** 'Amy Odom' <[Amy.Odom@mp2energy.com](mailto:Amy.Odom@mp2energy.com)>; [joonsup.park@gmail.com](mailto:joonsup.park@gmail.com); 'Adam Sinn' <[asinn@aspirecommodities.com](mailto:asinn@aspirecommodities.com)>  
**Cc:** 'Carey Jordan' <[Carey.Jordan@mp2energy.com](mailto:Carey.Jordan@mp2energy.com)>; Barry Hammond <[Barry@ruralroute3holdings.com](mailto:Barry@ruralroute3holdings.com)>; [amanda.mussalli@mp2energy.com](mailto:amanda.mussalli@mp2energy.com); [patrick@ruralroute3.holdings](mailto:patrick@ruralroute3.holdings)  
**Subject:** RE: April and May DGSP2

Thank you. Great that it finally ran again.  
Please note my new email address.

Cheers, and have a good weekend!  
Patrick.

**From:** Amy Odom [<mailto:Amy.Odom@mp2energy.com>]  
**Sent:** Wednesday, June 21, 2017 2:47 PM  
**To:** 'Joonsup.park@gmail.com' <[joonsup.park@gmail.com](mailto:joonsup.park@gmail.com)>; 'Adam Sinn' ([asinn@aspirecommodities.com](mailto:asinn@aspirecommodities.com)) <[asinn@aspirecommodities.com](mailto:asinn@aspirecommodities.com)>; 'pat.deman@gmail.com' <[pat.deman@gmail.com](mailto:pat.deman@gmail.com)>  
**Cc:** Carey Jordan <[Carey.Jordan@mp2energy.com](mailto:Carey.Jordan@mp2energy.com)>; 'Barry Hammond' <[Barry@ruralroute3holdings.com](mailto:Barry@ruralroute3holdings.com)>  
**Subject:** April and May DGSP2

Have a great day!

Amy Odom  
Director of Accounting  
MP2 Energy  
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