

Online Challenge Filing Form

This electronic filing form allows Challengers to complete and submit a Challenge under the Sunrise Challenge Policy for <.mobi> directly online to the WIPO Arbitration and Mediation Center.

After submitting this form, the Challenger will receive a confirmation message both on-screen and by electronic mail to the contact e-mail address provided by the Challenger in Section II.A.6. hereunder. This confirmation message will include the full text of the Challenge as received by the Center and will be automatically copied to the Registry.

Note: All fields marked with a star (*) are required fields. Challengers are advised to consult the [Challenge Filing Guidelines](#) posted on the Center's web page before completing this form.

Before the:
WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER

Challenger *

[Name of Challenger]

-v-

Respondent *

[Name of Respondent, as shown by
the <.mobi> whois database]

Disputed Domain Name *

.mobi

CHALLENGE

(Rules, Para. 3)

I. Introduction

[1.] This Challenge is hereby submitted to the WIPO Arbitration and Mediation Center (the Center) for decision in accordance with the Sunrise Challenge Policy for <.mobi> (the Policy) and the Rules for Sunrise Challenge Policy (the Rules). By submitting this Challenge to the Center the Challenger agrees to abide and be bound by the provisions of the Policy and the Rules.

II. The Parties

A. The Challenger

(Rules, Para. 3(c)(ii))

[2.] The Challenger in this administrative proceeding is:

Full name*

[Provide full name and, if relevant, legal status, place of incorporation and principal place of business]

[3.] The Challenger's contact details are as follows:

Address*	<input type="text"/>
Country *	<input type="text" value="Afghanistan"/>
Telephone *	<input type="text"/>
FAX	<input type="text"/>
E-mail *	<input type="text"/>
Additional information, if any	<input type="text"/>

[4.] The Challenger's authorized representative in this administrative proceeding is:
[If relevant, identify authorized representative.]

Full name

Organization

[5.] The contact details of the Challenger's authorized representative are as follows:

Address	<input type="text"/>
Country	<input type="text" value="Afghanistan"/>
Telephone	<input type="text"/>
FAX	<input type="text"/>

E-mail

Additional information,

if any

[6.] The Challenger's contact details for the purpose of communications directed to the Challenger in this administrative proceeding are:

Contact *

[Identify name of
one contact person
only]

Address *

[Specify one mailing
address only]

Telephone *

[Specify one
telephone number
only]

FAX

[Specify one fax
number only]

E-mail *

[Specify one e-mail
address only]

B. The Respondent

(Rules, Para. 3(c)(iii))

[7.] According to the <.mobi> Whois database, the Respondent in this administrative proceeding is:

Full name*

[Provide Respondent's name as shown by the <.mobi> Whois database.]

[8.] The Respondent's contact details as shown by the <.mobi> Whois database are:

Registrant

Address *

Country *

Telephone

FAX

E-mail *

Administrative Contact (if different from above)

Full name

Address

Telephone

FAX

E-mail

[9]. All additional Respondent contact information known to the Challenger, including as used successfully in the course of pre-challenge communications, is as follows:

III. The Domain Name and the Registrar

(Rules, Para. 3(c)(iv), 3(c)(v) and 3(d))

[10.] This dispute concerns the Domain Name identified below:

[Identify precisely the Domain Name at issue; only one Domain Name per Challenge.]

.mobi *

[11.] The registrar with which the Domain Name is registered is:

[Provide the name of the registrar with which the Domain Name is registered, as shown by the <.mobi> Whois database.]

*

IV. Jurisdictional Basis for the Administrative Proceeding

(Rules, Para. 3(a), 3(c)(i))

[12.] This dispute is properly within the scope of the Policy and the Center has jurisdiction to decide the dispute. The Registration Agreement, pursuant to which the Domain Name that is the subject of this Challenge is registered, incorporates the Policy. In addition, in accordance with Policy, Paragraph 4(a), the Respondent is required to submit to a mandatory administrative proceeding because:

* [check applicable box(es)]

- ☐ (1) at the time of the Respondent's registration of the Domain Name, no current (non-expired) trademark or service mark registration was registered in the Respondent's name;
- ☐ (2) the Domain Name is not identical to the textual or word elements of the trademark or service mark registration on which the registration of the Respondent's Domain Name is based;
- ☐ (3) the trademark or service mark registration on which the registration of the Respondent's Domain Name is based is not of national effect;
- ☐ (4) the trademark or service mark on which the registration of the Respondent's Domain Name was based was not registered or applied for, prior to July 11, 2005, with the trademark authority with which the mark is registered.

V. Factual and Legal Grounds

(Policy, Para. 4(a); Rules, Para. 3(c)(vi))

[13.] This Challenge is based on the following grounds:

[In accordance with Rules, Paragraph 3(c)(vi), you shall describe the grounds on which the Challenge is made, including why the Domain Name that is the subject of the dispute should be considered to have been registered in violation of the Sunrise Registration Conditions set forth in the Registration Agreement and reproduced in Paragraph 4(c) of the Policy, in particular how (1) at the time of the Respondent's registration of the Domain Name, no current (non-expired) trademark or service mark registration was registered in the Respondent's name; or (2) the Domain Name is not identical to the textual or word elements of the trademark or service mark registration on which the registration of the Respondent's Domain Name is based; or (3) the trademark or service mark registration on which the registration of the Respondent's Domain Name is based is not of national effect; or (4) the trademark or

service mark on which the registration of the Respondent's Domain Name was based was not registered or applied for, prior to July 11, 2005, with the trademark authority with which the mark is registered.] *



[If you are seeking a transfer of the disputed Domain Name, you shall also specify the bases for the Challenger's own compliance with the Sunrise Registration Conditions, in particular how (1) at the time of the registration of the Domain Name, a trademark or service mark was registered in the name of the Challenger, and was current (non-expired); and (2) the textual or word elements of the trademark or service mark registration are identical to the Domain Name; and (3) the trademark or service mark registration is of national effect; and (4) the trademark or service mark was registered or applied for, prior to July 11, 2005, with the trademark authority with which the mark is registered.]



[In accordance with Rules, para. 3(c)(vi), this section should not exceed 2,000 words]

VI. Remedy Requested

(Rules, Para. 3(c)(vi) and (vii), 3(e); Policy, Para. 4(b) and (c))

[14.] In accordance with Paragraph 4(h) of the Policy, for the reasons described in Section IV and V above, the Challenger requests the Center to make the following determination concerning the Challenged Domain Name registration: *

- ☐ Transfer to Challenger
- ☐ Cancellation

[If a transfer is requested, the Challenger must submit, within forty-five (45) days of the commencement of the administrative proceeding (as established by the Notification of Challenge issued by the Center) the original(s), or copies certified by the issuing trademark authority, of any trademark or service mark certificate(s) establishing the Challenger's compliance with the Sunrise Registration Conditions, pursuant to Rules, Paragraph 3(e) and Policy, Paragraph 4(c).]

VII. Other Legal Proceedings

(Rules, Para. 3(c)(viii))

[15.] [Identify any other legal proceedings that have been commenced or terminated in connection with or relating to the Domain Name that is the subject of the Challenge and summarize the issues that are the subject of that/those proceeding(s).]

VIII. Payment

(Policy, Para. 4(d); Rules, Para 12(d), 13)

[16.] [Check only one box:] *

- ☐ As required by the Rules, the Challenger hereby authorizes the Center to have the Challenger's fee in the amount of USD 750 debited from the following credit card:

Card Holder Name
Card Number
Card Expiry Date
Card Type

- ☐ As required by the Rules, the Challenger hereby agrees to pay the Challenger's fee of USD 750 and will specify the credit card details by telephone, in accordance with the Challenge Filing Guidelines.

[The Challenge will be dismissed if the required payment has not been received by the Center within fifteen (15) days of the filing of the Challenge. No payment-related information, including credit card details, will be communicated by the Center to the Respondent, the Registrar or the Registry.]

IX. Certification

(Rules, Para. 3(c)(ix) and (x))

[17.] Challenger 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 Center, (b) the Registrar, (c) the Registry, and (d) ICANN, as well as their directors, officers, employees, and agents.

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

[19.] If Challenger is seeking transfer of the Domain Name, Challenger further certifies that the trademark or service mark registration forming the basis of this Challenge and potential registration of the Domain Name in question was current (non-expired) at the time of the registration of the Domain Name, and was already registered or applied for, prior to July 11, 2005, with the trademark authority with which the mark is registered.

Respectfully submitted,

Name *

[Identify name of submitting person]

[Submit Online Challenge Form](#)