

Online Response Filing Form

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

The Response must be submitted using this form within forty-five (45) days of the date of commencement of the administrative proceeding, as established by the Notification of Challenge issued by the Center, informing the Respondent that a Challenge under the Policy has been filed against it. The Response must also be submitted in hard copy (with annexes) by postal or courier service (postage pre-paid and return receipt requested).

After submitting this form, you will receive a confirmation message both on-screen and by e-mail to the address provided in Section II.A.6. hereunder. This confirmation message will include the full text of the Response as received by the Center and will allow you to save and print it in order to include it with your hard copy submission. The confirmation message will be automatically copied to the Challenger.

Note: All fields marked with a red star (*) are required fields. Respondents are advised to consult the [Response 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]

Case Number *
[Indicate case number
assigned by the Center]

Disputed Domain Name * .mobi

Response

(Rules, Para. 5(b))

I. Introduction

[1.] On * [indicate date on which the Notification of Challenge was received], the

Respondent received a Notification of Challenge from the WIPO Arbitration and Mediation Center (the Center) which informed the Respondent that an administrative proceeding had been initiated by the Challenger in accordance with the Sunrise Challenge Policy (the Policy) and the Rules for Sunrise Challenge Policy (the Rules).

The Center set * [provide date specified in the Notification of Challenge] as the last day for the submission of a Response by the Respondent.

II. The Parties

(Rules, Para. 5(c)(iii))

A. The Respondent

[2.] The Respondent 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 Respondent's contact details are as follows:

Address*

Country *

Telephone *

FAX

E-mail *

Additional information,
if any

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

Full name:

Organization:

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

Address

Country

Afghanistan

Telephone

FAX

E-mail

Additional information,

if any:

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

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 Challenger

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

Full name*:

[Provide full name as specified in
the Challenge.]

[8.] The Challenger's specified e-mail address for the purpose of communications directed to the Challenger in this administrative proceeding is:

E-mail*:

[Provide e-mail address indicated
in Section II.A.6. of the
Challenge; one e-mail address
only.]

III. Response to Statements and Allegations Made in Challenge

(Policy, Para. 4(c); Rules, Para. 5(c)(ii))

A. Factual and Legal Grounds

[9.] The Respondent hereby responds to the statements and allegations contained in the Challenge and respectfully requests the Center to deny the remedies requested by the Challenger for the following reasons:

(1) At the time of the registration of the Domain Name, a trademark or service mark was registered in the name of Respondent and was current (non-expired), as evidenced by the date(s) set forth in the certificate itself. *

[Provide further explanation.]

A large, empty rectangular text box with a thin black border and a vertical scrollbar on the right side.

(2) The textual or word elements of the Respondent's trademark or service mark registration are identical to the Domain Name.*
[Provide further explanation.]

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(3) The Respondent's trademark or service mark registration is of national effect.*
[Provide further explanation.]

A large, empty rectangular text box with a thin black border and a vertical scrollbar on the right side.

(4) The Respondent's trademark or service mark was registered or applied for, prior to July 11, 2005, with the trademark authority with which the mark is registered.*
[Provide further explanation.]

A large, empty rectangular text box with a thin black border and a vertical scrollbar on the right side.

(5) Additional arguments, if any:



[The above section of the Response (i.e. Factual and Legal Grounds) should not exceed the 2000 word limit provided under Rules, Paragraph 5(c)(ii).]

B. List of Annexed Trademark or Service Mark Certificate(s)

(Rules, Para. 5(c)(i))

[10.] The original(s), or copies certified by the trademark authority with which the mark is registered, of the trademark certificate(s) demonstrating compliance with the Sunrise Registration Conditions are annexed to the hard copy of the Response (along with two (2) copies of each document submitted). Below is the schedule of the annexed certificates: *

[The schedule should include the following information: (1) issuing authority, (2) date of application and/or registration, (3) name of holder, (4) trademark. A certified copy of a trademark or service mark certificate means a copy certified by the trademark office with which the trademark or service mark is registered.]



IV. Other Legal Proceedings

(Rules, Para. 5(c)(iv))

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



V. Certification

(Rules, Paras. 5(c)(v) and (vi))

[12.] Respondent certifies that the trademark or service mark registration forming the basis for the registration of the Domain Name 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.

[13.] 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 and that the assertions in this Response 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.

Respectfully submitted,

Name: *

[Identify name of submitting person]

Signature:

[The hard copy of the Response must be signed by either the Respondent or its authorized representative (Rules, Paragraph 5(c)(vi)).]

Submit Online Response Form