

DATE:

WIPO Case Number:

RESPONSE regarding the Alternative Dispute Resolution for the disputed domain name(s) <

.se>

Complete the below Model Response for submission and send it as an email attachment to

domain.disputes@wipo.int

For queries, please call +41 (0)22 338 8247 or email arbiter.mail@wipo.int

1. FACTUAL GROUND

1.1 Domain Holder

Name/Company	Personal ID number/Company number
Postal address	
Country	Phone number (<i>incl. area code</i>)
Email address	

1.2 Representative (when applicable)

Name/Company	
Postal address	
Country	Phone number (<i>incl. area code</i>)
Email address	

1.3 Petitioner

Name/Company	Personal ID number/Company number
Postal address	
Country	Phone number (<i>incl. area code</i>)
Email address	

1.4 Representative (when applicable)

Name/Company	
Postal address	
Country	Phone number (<i>incl. area code</i>)
Email address	

2. ARBITRATOR *The Domain Holder is required to tick only one of the below boxes:*

The Petitioner has elected to have the dispute decided by one arbitrator and the Domain Holder accepts that the dispute be decided by one arbitrator.

The Petitioner has elected to have the dispute decided by three arbitrators, and the Domain Holder accepts that the dispute is decided by three arbitrators, and hereby selects _____ as arbitrator(s) (*the Domain Holder may choose one of the three arbitrators. The names of the nominees (up to three nominees) may be taken from the Center's published list of .SE WIPO Domain Name arbitrators at <https://www.wipo.int/amc/en/domains/panel/panelists.jsp?code=seDRP>*).

The Petitioner has elected to have the dispute decided by one arbitrator. The Domain Holder elects to have the dispute decided by three arbitrators and hereby selects _____ as arbitrator(s) (*the Domain Holder may choose one of the three arbitrators. The names of the nominees (up to three nominees) may be taken from the Center's published list of .SE WIPO Domain Name arbitrators at <https://www.wipo.int/amc/en/domains/panel/panelists.jsp?code=seDRP>*).

If the Domain Holder elects to have the dispute decided by three arbitrators, a fee of _____ (*amount*) SEK has on the _____ (*date*) been paid to IIS through deposit/payment on/via bank account/bankgiro/credit card in accordance to IIS' instructions.

Eventual partial refund should be transferred to the Domain Holder under certain circumstances, see further information on IIS website. IIS shall contact the Domain Holder in such cases.

3. LEGAL GROUNDS

3.1 Claim

The Domain Holder: *(please tick the appropriate box)*

consents

objects

to the claim requested by the Petitioner.

3.2 Facts and legal grounds invoked to contest the Petition *(if you need more space, please submit appendix)*

The Domain Holder hereby responds to the statements and allegations in the Petition:

3.2.1 Whether the Domain Name is identical or similar to a name¹ which is legally recognized in Sweden and to which the Petitioner can prove its rights

3.2.2 Whether the Domain Name has been registered or used in bad faith

3.2.3 Whether the Domain Holder has rights or justified interest in the Domain Name

¹ According to Paragraph 7.2 of the .SE Policy, a name is "a trade symbol (trademark or service mark); a trade name or secondary name; a family name; an artist's name (if the name is not associated with someone who deceased a long time ago); a title of another party's copyrighted literary or artistic work; a name that is protected by the Regulation concerning Certain Official Designations (1976:100); or the name of a government authority that is listed in the registry that Statistics Sweden must maintain under the Swedish Code of Statutes SFS 2007:755 (Government Agencies Register Ordinance), or its generally accepted abbreviation".

3.3 Evidence *(if you need more space, please submit appendix)*

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3.4 Appendix

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Date and place	Signature
Function, for example authorized signatory or representative	Clarification of signature