

**Asian Domain Name Dispute Resolution
Centre
(Hong Kong Office)**

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

This form shall be used to apply to Asian Domain Name Dispute Resolution Centre (ADNDRC) pursuant to the Uniform Policy for Domain Name Dispute Resolution, approved by the Internet Corporation for Assigned Names and Numbers (ICANN) on 24 October 1999 (the Policy), the Rules for Uniform Domain Name Dispute Resolution Policy, approved by ICANN Board of Directors on 30 October 2009 (the Rules) and the ADNDRC Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the Supplemental Rules).

CHOICE OF ADNDRC OFFICE TO ADMINISTER THE PROCEEDINGS
The Complainant hereby chooses the Hong Kong Office of the ADNDRC to administer the domain name dispute proceedings referred to in this Complaint.

3 PREFERRED METHOD OF COMMUNICATIONS BY THE COMPLAINANT:
(Please indicate by ticking the box provided.)

- Email
- Mail
- Facsimile

1 DISPUTED DOMAIN NAME(S): *(Names to be listed in full)
(If there is insufficient space, please provide details on a separate A4 sheet in the same format.)*

<fs-guess.com>

("Disputed Domain Name")

2 INDICATE THE REGISTRAR(S) WITH WHICH THE DOMAIN NAME(S) IS REGISTERED, INCLUDING THEIR FULL CONTACT DETAILS:

Name: Xinnet Technology Corporation
Address: Suite 607, Prime Tower, No.22 Chaowai Street, Chaoyang District, Beijing 100020, People's Republic of China

Email: bj@xinnet.com

PREFERRED METHOD OF COMMUNICATIONS BY THE RESPONDENT:
(Please indicate by ticking the box provided.)

- Email
- Mail
- Facsimile

4 DETAILS OF PARTIES: *(If there is more than one Complainant, please use a separate A4 sheet to provide the contact details for each and briefly describe the basis on which they are being joined in a common Complaint. If there is more than one respondent, a separate Form C should be used.)*

COMPLAINANT:

Name: Guess?, Inc
 Address: 1444 South Alameda Street,
 Los Angeles, California 90021, USA
 Email: N/A
 Place of Incorporation: United States of
 America
 Principal Place of Business: United
 States of America

Authorized Representative (if any):

Name: Hogan Lovells
 Address:
 11th Floor, One Pacific Place
 88 Queensway
 Hong Kong
 Tel No: +852 2219 0888
 Fax No: +852 2219 0222
 Email: deanna.wong@hoganlovells.com

RESPONDENT:

Name: Liu JinGang
 Address: GuangZhou, Guangdong
 People's Republic of China 51000
 Tel No: 86-020-36212942
 Fax No: 86-10-36212942
 Email: midocn@126.com
 Legal Status: Individual (China)
 Place of Incorporation: N/A
 Principal Place of Business: N/A

Authorized Representative (if any):

Name _____
 Address _____

 Tel No _____
 Fax No _____
 Email _____

5 INDICATE REASONS WHY THE PERSON / ENTITY IDENTIFIED IN THE COMPLAINT HAS BEEN IDENTIFIED AS THE RESPONDENT: *(Copy of database search(es) should be attached to this Complaint.)*

According to extracts from the WHOIS database accessed through <<http://www.who.is>> database on 22 March 2011, Liu JinGang is the registrant of the Disputed Domain Name. A copy of the extract from the WHOIS database showing Liu JinGang as the registrant of the Disputed Domain Name is attached at **Annexure 1**.

6 INDICATE WHETHER THERE ARE LEGAL PROCEEDINGS THAT HAVE BEEN COMMENCED OR TERMINATED IN CONNECTION WITH OR RELATING TO ANY OF THE DOMAIN NAME(S) THAT ARE THE SUBJECT OF THE COMPLAINT: (Please attach any supporting documentation.)

The Complainant has not commenced any judicial or other legal proceedings in respect of the Disputed Domain Name.

7 COMPLAINT: (Please specify the trade mark(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. If applicable, please attach copies of all registration certificates.)

Guess owns various trade marks around the world consisting of the word "GUESS" as the sole or dominant element, including but not limited to GUESS and GUESS?, in addition to a series of trade marks around the world that incorporate the word "GUESS" as the distinctive identifying element, including but not limited to GUESS? WHO, GUESS KIDS, BABY GUESS, GUESS BY MAURICE MARCIANO, MARCIANO COLLECTION FOR GUESS, GUESS BY MARCIANO (collectively, the "**GUESS Marks**"), in many classes of goods, including furniture in class 20. A Schedule of the Complainant's trade mark registrations for the GUESS Marks is attached as **Annexure 2**.

Attached at **Annexure 3** are copies of the registration certificates for a few of the GUESS Marks in the PRC and Hong Kong as well as extracts from the official trade marks databases in other selected countries evidencing trade mark registrations in those countries, including in relation to furniture in class 20. Due to the vast number of trade mark registrations it is impracticable for the Complainant to provide copies of the registration certificates/extracts from official trade marks databases for all of the GUESS Marks. The Complainant would, however, be happy to provide copies of the registration certificates and/or extracts from the official trade marks databases for any of the other trade marks upon request by the Panel.

8 SUMMARIZE BRIEFLY THE FACTUAL AND LEGAL GROUNDS ON WHICH THE COMPLAINT IS MADE: (Word limit shall be 3,000 words maximum.)

The Complainant

GUESS?, INC. is a company incorporated in the United States of America (the "**Complainant**"). The Complainant was first established in 1981 and is listed on the New York Stock Exchange. The Complainant and its related undertakings (collectively, "**Guess**") are a leading fashion group specialising in clothing and accessories for men, women and children. In addition to clothing, Guess designs and sells a wide range of accessories including but not limited to eyewear, watches, handbags, footwear, belts and jewelry. Guess' products are sold in 84 countries around the world, and Guess owns 1,210 GUESS and GUESS Accessory retail stores worldwide.

Guess also operates an online store via its website located at www.guess.com (the "**Guess Website**"). In 2007, the Guess Website generated 13,884,441 hits on average on a daily basis, including 104,806 hits per day in the PRC. Attached at **Annexure 4** is a document evidencing the daily hits for the Guess Website in 2007.

Guess has for many years been actively and extensively using various trade marks incorporating the common element "GUESS" in the PRC and elsewhere, including, amongst others, GUESS and GUESS?, which have been used by Guess in at least the United States since the 1980s.

Through extensive use and promotion, Guess has gained substantial goodwill and reputation in the GUESS Marks in the PRC and many other jurisdictions around the world. Guess has expended much time, effort and money in promoting and protecting the GUESS Marks in the PRC and many countries throughout the world. In the financial year ending on 31 January 2009, the Complainant spent over US\$ 36.5 million promoting the Guess brand. An extract from the Complainant's 2009 Annual Report evidencing its global advertising spend are attached at **Annexure 5**. The GUESS Marks have come to be and are well-known and are of great value to the Complainant. Guess enjoys substantial reputation and goodwill in the goods which are provided, recognised, sold and promoted under and by reference to the GUESS Marks in the PRC and internationally. In the minds of members of the trade and the public, the GUESS Marks identify the Complainant and its goods. The GUESS Marks have come to be identified exclusively and distinctively with the business of the Complainant.

In 2009, the Complainant's global sales increased 20% to US\$ 2.1 billion. As the Guess brand continues to grow, the Complainant plans to execute global expansion plans, incorporating North America, Asia, Europe, the Middle East and Central and South America. In 2009, the Complainant operated 36 free standing stores and 43 concessions in greater China, with 20 new free standing stores being opened in 2009. Extracts from the Complainant's 2009 Annual Report evidencing global sales, and global expansion activities are attached at **Annexure 6**.

The Respondent

The Complainant became aware of the Respondent when it discovered that the Foshan GUESS Sanitary Ware Industrial Co., Ltd. ("**Foshan Guess**") had applied to register a number of trade marks in the PRC for the word "GUESS" in various classes of goods and services in 2010.

The Chinese name of the company is 佛山市仟佰惠卫浴有限公司. The first three characters 佛山市 means Foshan City (pronounced as Foshan Shi); 仟佰惠 means "thousand" "hundred" "favoured/privilege" (pronounced as qian bai hui) and 卫浴有限公司 means sanitary bathing company limited.

The Complainant subsequently discovered the website, www.fs-guess.com (to which the Disputed Domain Name resolves) (the "**Website**"), through which the registrant, in the name of its company, Foshan Guess promotes its sanitary products and bathroom furniture and hardware.

The Disputed Domain Name is identical and/or confusingly similar to trade or service marks in which the Complainant has rights

The Disputed Domain Name incorporates the Complainant's "Guess" mark in its entirety. The only difference between the Disputed Domain Name and the Complainant's "Guess"

mark is the inclusion of the letters "fs" as a prefix. Fs is simply a geographical reference to Foshan, shortened to "fs" as a prefix as mentioned below.

It is well-established that in cases where the distinctive and prominent element of a disputed domain name is the complainant's mark and the only addition is a generic term that adds no distinctive element, such an addition does not negate the confusing similarity between the disputed domain name and the mark. See *Oakley, Inc. v. Joel Wong/BlueHost.com- INC*, WIPO Case No. D2010-0100; *Diageo Ireland v. Guinnessclaim*, WIPO Case No. D2009-0679; *The Coca-Cola Company v. Whois Privacy Service*, WIPO Case No. D2010-0088, copies of which are attached at **Annexure 7**.

Further, "fs" is clearly a reference to the Chinese city of "Foshan". It is well established that in case where the distinctive and prominent element of a disputed domain name is the complainant's mark and the only deviation from this is the inclusion of a geographic indicator as a prefix or a suffix, such prefix or suffix does not negate the confusing similarity between the disputed domain name and the mark. See *Kabushiki Kaisha Toshiba dba Toshiba Corporation v. WUFACA* (WIPO Case No. D2006-0768), a copy of which is attached at **Annexure 8**.

"GUESS" is clearly the distinctive and prominent component of the Disputed Domain Name and the inclusion of the letters "fs" does nothing to distinguish it from the GUESS Marks, as outlined above but rather creates the impression that the Disputed Domain Name is related to a GUESS stores located in Foshan.

The Complainant also notes that it is well established that, in making an enquiry as to whether a trade mark is identical or confusingly similar to a domain name, the domain extension, in this case <.com >, should be disregarded. The Complainant refers the Panel to the WIPO Arbitration and Mediation Center's decision of *Rohde & Schwarz GmbH & Co. HG v. Perthshire Marketing, Ltd* (Case No. D2006-0762), a copy of which is attached at **Annexure 9**.

The Complainant accordingly submits that it has proved that the Disputed Domain Name is identical and/or confusingly similar to registered trade marks in which the Complainant has rights or interests for the purposes of Article 4(a)(i) of the ICANN UDRP.

The Respondent has no right or legitimate interest in respect of the Disputed Domain Name

The GUESS Marks have acquired meanings through their extensive use by the Complainant in commerce, so that the GUESS Marks are immediately recognisable to consumers as being associated with the Complainant and its business. Attached at **Annexure 10** are print outs of search results from three of the major Internet search engines, Google, Yahoo! and Baidu, indicating that the vast majority of search results returned for searches of "GUESS" relate to the Complainant.

The fact that the Complainant's adoption and first use of the GUESS Marks significantly pre-date the Respondent's registration and use of the Disputed Domain Name has the practical effect of shifting to the Respondent the burden of proof in establishing that it has legitimate rights and/or interests in the Disputed Domain Name. The Complainant refers the panel to

PepsiCo, Inc. v. PEPSI, SRL (a/k/a P.E.P.S.I.) and EMS COMPUTER INDUSTRY (a/k/a EMS) (Case No. D2003-0696), a copy of which is attached at **Annexure 11** in support of this principle.

The Respondent has used the Disputed Domain Name to operate the Website dealing in furniture (amongst other products), which are goods for which the Complainant has trade mark registrations (as outlined above). The Complainant has not consented to or authorised the Respondent's use of its GUESS Marks. Further, as the Complainant has only recently become aware of the Respondent's use of the Disputed Domain Name, the Complainant cannot be said to have acquiesced to such use. To the contrary, the Complainant is presently taking steps to pursue all actions available to it to put an end to the Respondent's misappropriation of the Complainant's rights. The Respondent's company, Foshan Guess, recently applied to register nine trade marks for "GUESS" or Guess in Chinese, in the PRC on 25 January 2010. Copies of extracts from the official trade mark data base, evidencing the Respondent's company's applications for "Guess" trade marks in the PRC are attached as **Annexure 12**. The Complainant filed an opposition against Foshan Guess's trade mark application no. 8022650 for "GUESS" in March 2011, on the basis of the Complainant's prior rights in the Guess Marks.

Moreover, given the degree of reputation of the GUESS Marks in PRC and worldwide, it is clear that the Respondent:

- registered <fs-guess.com> as a domain name;
- adopted 'Foshan Guess Sanitary Wares Industrial Co.,Ltd' as a company name; and
- applied to register GUESS as a trade mark,

with a view to creating confusion and trading off the Complainant's reputation in the GUESS brand. The Respondent could have chosen any company name, trade mark and domain name to conduct its business. Instead, the Respondent chose to conduct business using the mark "GUESS", which is identical to the Complainant's famous, extremely reputable and prestigious brand. Luxury brands such as the Complainant often extend their operations to include the design of goods other than fashion accessories, and therefore consumers are likely to believe that the modern design sanitary products/furniture offered by the Respondent have been provided as part of a collaboration with the Complainant or under the supervision or approval of the Complainant. They clearly chose the English domain name to take advantage of the GUESS brand.

The Respondent would have been aware of this fact at the time of adopting the Foshan Guess company name and registering the Disputed Domain Name, and accordingly the Respondent's use of the Disputed Domain Name cannot be bona fide, even though the Respondent had been offering goods for sale prior to the notice of these proceedings. The Complainant refers the panel to the WIPO case of *Microchip Technology, Inc. v. Milo Krejčik and EDI Corporation, d/b/a Aprilog.com*, No. D2001-0337 (A copy of which is attached at **Annexure 13**) in which the Panel in deciding whether the Respondent has rights or legitimate interests in the Disputed Domain Name, held that although the respondent had been offering legitimate goods for sale prior to any notice of dispute, as the respondent used the domain name to resolve to a website where users were likely to be confused as to

whether the site was affiliated with the complainant, the respondent could not be bona fide and did not have legitimate rights or interest in the domain name.

Accordingly, use of the Complainant's well-known GUESS trade mark in connection with the goods offered by the Respondent cannot be deemed to be (i) "use in connection with any bona fide offering of goods or services" or (ii) "legitimate non-commercial use" which, in the absence of any trade mark rights or lawfully acquired reputation in "GUESS", may otherwise have served to confer upon the Respondent a legitimate right or interest in the Disputed Domain Name.

The Complainant accordingly submits that it has proved that the Respondent has no right or legitimate interest in respect of the Disputed Domain Name for the purposes of Article 4(a)(ii) of the ICANN UDRP.

The Disputed Domain Name has been registered and is being used by the Respondent in Bad Faith

The Complainant submits that the Disputed Domain Name has been registered and is being used by the Respondent in bad faith on the following grounds:

- (i) In addition to its numerous trade mark registrations in PRC and elsewhere, the Complainant's GUESS brand is a well-known trademark with a strong reputation;
- (ii) The circumstances indicate that the Respondent has intentionally used the Complainant's "GUESS" Mark in an attempt to attract, for commercial gain, Internet users to its Websites, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's Websites and the products offered on them.

The Respondent registered the Disputed Domain Name in December 2009 almost 30 years after the Complainant commenced use of the GUESS Marks, and many years after the GUESS Marks gained a great degree of fame and goodwill in the PRC.

It is well established that the Respondent's registration and use of the Disputed Domain Name must involve mala fides in circumstances where the registration and use was and continues to be made in the full knowledge of the Complainant's prior rights in the GUESS Marks, and in circumstances where the Respondent did not seek permission from the Complainant, as the owner of the trade marks, for such registration and use. The Complainant refers the panel to the case of *Veuve Clicquot Ponsardin, Maison Fondée en 1772 v. The Polygenix Group Co.* (Case No. D2000-0163), a copy of which is attached at **Annexure 14**. In this case, in deciding that the registrant had used and registered the domain name in bad faith, the panel took into account the fact that the respondent registered the domain name with knowledge of the complainant's longstanding prior rights. In addition, it is also well-established that the registration of a well-known trademark of which the Respondent must reasonably have been aware constitutes an evidence of bad faith (see *Dr. Ing. H.c F. Porsche AG v. Rojeen Rayaneh*, WIPO case No. D2004-0488, copy of which is attached at **Annexure 15**).

As outlined above, given the degree of fame of the GUESS Marks throughout the world, including PRC, it is clear that the Respondent has chosen to use GUESS as a company name and domain name and to apply to register GUESS as a trade mark, with a view to creating confusion and to take advantage of the Complainant's reputation in the GUESS brand. The trade mark applications filed by the Respondent's company, Foshan Guess, are not for "Foshan Guess" but simply "GUESS" and GUESS in Chinese characters. Similarly, the mark "GUESS" is prominently displayed on the Website, rather than "Foshan Guess", as shown below and in the screen shots of the Website attached as **Annexure 16**:



The Respondent also has chosen to capitalise the word "GUESS" in its company name, as shown below:



This emphasises the word "GUESS" and is also an obvious attempt to draw an association with the Complainant's GUESS Mark, which is always displayed in capital letters (as shown in the extract from the Complainant's annual report attached as Annexure 6).

It is clear that the Respondent is using the Disputed Domain Name in bad faith. The Respondent is operating the Website as a business to sell sanitary products and furniture to Internet users who are likely to assume that the Respondent's Website is somehow associated with the Complainant's business. This is particularly the case given that the Complainant has registered the GUESS trade mark in relation to furniture. Moreover, it is also obvious that the Respondent is attempting to make undue profit based on the Complainant's investments and goodwill in the GUESS Marks. Accordingly, there can be no possible grounds on which to find that the Respondent's registration and use of the Disputed Domain Name has been otherwise than in bad faith and for the purpose of misappropriating the Complainant's goodwill and disrupting the Complainant's business in PRC and elsewhere.

Further, the Respondent is deriving profit from the Website (as evidenced by the many items advertised on the Website), which given the likelihood of consumer confusion with the Complainant's mark, is not consistent with registration and use in good faith. See *Sports Holdings, Inc. v. WHOIS ID Theft Protection*, WIPO Case No. D2006-1146; *The Conference Board, Inc. v. Belize Domain WHOIS Service*, WIPO Case No. D2010-0301; and *Roche Products Inc. v. Michael Trinidad, TvForever*, WIPO Case No. D2007-1259, copies of which are attached as **Annexure 17**.

The Complainant accordingly submits that it has proven that the Respondent has registered and is using the Disputed Domain Name in bad faith for the purposes of Article 4(a)(iii) of the ICANN UDRP.

9 REMEDIES SOUGHT:

The Complainant requests that the panel decide that the Disputed Domain Name shall be transferred to the Complainant.

10 THE COMPLAINANT ELECTS TO HAVE THE COMPLAINT DECIDED BY ONE / * PANELIST(S):

(delete as appropriate)*

11 IF THERE ARE THREE PROPOSED PANELIST(S), PLEASE LIST THEM BELOW IN PREFERNECE TOGETHER WITH THEIR CONTACT DETAILS:

1. N/A _____
2. _____
3. _____

12 THE COMPLAINANT SHALL SUBMIT, WITH RESPECT TO ANY CHALLENGES TO A DECISION IN THE ADMINISTRATIVE PROCEEDING CANCELING OR TRANSFERRING THE DOMAIN NAME(S), TO THE JURISDICTION OF THE COURTS IN AT LEAST ONE SPECIFIED MUTUAL JURISDICTION. (Please indicate by ticking the box provided.)

- the location of the principal office of the concerned registrar.
the location of the domain name holder's address, as shown for the registration of the domain name(s) in the concerned registrar's Whois database at the time of the submission of the Complaint to the Center.
- the location of the principal office of the concerned registrar AND the domain name holder's address, as shown for the registration of the domain name(s) in the concerned registrar's Whois database at the time of the submission of the Complaint to the Center.

13 REGISTRATION AGREEMENT INCORPORATING THE ICANN POLICY (A copy is attached to this Complaint.)

A copy of the Registration Agreement incorporating the ICANN Policy is attached at **Annexure 18.**

14 HAS A COPY OF THIS COMPLAINT TOGETHER WITH THE COMPLAINT TRANSMITTAL COVER SHEET (CTC)" BEEN SENT OR TRANSMITTED TO THE RESPONDENT(S) AND THE CONCERNED REGISTRAR(S)? (Please attach documentary verification of service.) **YES***
** delete as appropriate)*

15 OTHER RELEVANT DETAILS:

N/A

16 ADDITIONAL INFORMATION

- (i) Annex any additional documentation to support the Complaint, together with a schedule indexing such document(s).
- (ii) The Complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.
- (iii) This Complaint shall be submitted in hard copy (refer to Article 3(1) of the Supplemental Rules) and in electronic form to the Hong Kong Office of ADNDRC:

Asian Domain Name Dispute Resolution Centre (Hong Kong Office)

38/F Two Exchange Square,

8 Connaught Place Central,

Hong Kong

Tel: (852) 2525 2381

Fax: (852) 2524 2171

Email: hkiac@adndrc.org

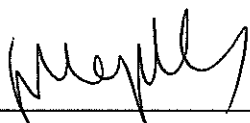
- (iv) Enclose appropriate fees in accordance with Article 15 of the Supplemental Rules.
- (v) The following documents should be consulted in connection with preparing this Complaint:
 - ICANN Uniform Domain Name Dispute Resolution Policy ("the Policy");
 - ICANN Rules for Uniform Domain Name Dispute Resolution Policy ("the Rules");
 - ADNDRC Supplemental Rules for Uniform Domain Name Dispute Resolution Policy ("the Supplemental Rules")
- (vi) Any communication by a party shall be copied to the other party and the ADNDRC's Hong Kong Office.

17 CERTIFICATE

The 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) ADNDRC, or any of its Offices, or any Panelist(s), 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.

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

Signature:  Date: 23 March 2011

Name and Capacity (in print): Hogan Lovells - Legal Representative of Complainant

List of Annexures

Annexure 1	WHOIS records for <fs-guess.com> dated 22 March 2011
Annexure 2	A spreadsheet of the Complainant's trade mark registrations relating to the GUESS Marks
Annexure 3	Copies of the registration certificates/extracts from official trade mark websites for a selection of the Complainant's registered trade marks in mainland China, Hong Kong and other jurisdictions
Annexure 4	Document evidencing the daily hits generated by the Guess Website in 2007
Annexure 5	An extract from the Complainant's 2009 Annual Report evidencing its global advertising spend
Annexure 6	Extracts from the Complainant's 2009 Annual Report evidencing global sales, and global expansion activities
Annexure 7	Copies of <i>Oakley, Inc. v. Joel Wong/BlueHost.com- INC</i> , WIPO Case No. D2010-0100; <i>Diageo Ireland v. Guinnessclaim</i> , WIPO Case No. D2009-0679 and <i>The Coca-Cola Company v. Whois Privacy Service</i> , WIPO Case No. D2010-0088
Annexure 8	Copy of <i>Kabushiki Kaisha Toshiba dba Toshiba Corporation v. WUFACA</i> (WIPO Case No. D2006-0768)
Annexure 9	Copy of <i>Rohde & Schwarz GmbH & Co. HG v. Pertshire Marketing, Ltd</i> (Case No. D2006-0762)
Annexure 10	Print outs of search results from Google, Yahoo! and Baidu for the term "GUESS"
Annexure 11	Copy of <i>PepsiCo, Inc. v. PEPSI, SRL (a/k/a P.E.P.S.I.) and EMS COMPUTER INDUSTRY (a/k/a EMS)</i> (Case No. D2003-0696)
Annexure 12	Copies of extracts of the Respondent's company trade mark applications in the PRC
Annexure 13	<i>Microchip Technology, Inc. v. Milo Krejcik and EDI Corporation, d/b/a Aprilog.com</i> , WIPO Case No. D2001-0337
Annexure 14	Copy of <i>Veuve Clicquot Ponsardin, Maison Fondée en 1772 v. The Polygenix Group Co.</i> (Case No. D2000-0163)
Annexure 15	<i>Dr. Ing. H.c F. Porsche AG v. Rojeen Rayaneh</i> , WIPO case No. D2004-0488
Annexure 16	Screen shots from the Respondent's Website
Annexure 17	Copy of <i>Sports Holdings, Inc. v. WHOIS ID Theft Protection</i> , WIPO Case No. D2006-1146; <i>The Conference Board, Inc. v. Belize Domain WHOIS Service</i> , WIPO Case No. D2010-0301; and <i>Roche Products Inc. v. Michael Trinidad, TvForever</i> , WIPO Case No. D2007-1259
Annexure 18	A copy of the Registration Agreement downloaded from the registrar's website