

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

YIN SHENG,)	
)	
Plaintiff)	
)	
v.)	
)	Case No. 1:21-cv-00816-TSE-JFA
JOHN DOE, and 509.COM,)	
)	
Defendants.)	
)	

ANSWER AND AFFIRMATIVE DEFENSES

Defendant Dashiell Shapiro (“Defendant”), proceeding *pro se*, is the owner of the domain name 509.com that is the subject of this proceeding (the “Domain Name”). The Complaint alleges that the Domain Name was “hacked.” However, Defendant obtained the Domain Name at a well-publicized auction from a recognized domain name marketplace (Sedo.com) in February of 2021. Defendant paid the purchase price and received the domain shortly thereafter.

Defendant answers the numbered paragraphs of the Plaintiff’s complaint as follows:

1. Defendant lacks information sufficient to admit or deny, and therefore denies.
2. Defendant admits that the Domain Name, 509.com, is an internet domain name and that Verisign, Inc.’s primary place of business is located within this judicial district. Defendant denies that the Domain Name is rightfully owned by Plaintiff.
3. Defendant denies that it gained unauthorized access to Plaintiff’s protected domain name registrant account or that it, without consent or authority, transferred control of Domain Name away from plaintiff.
4. Denies.

5. Denies.
6. Denies.
7. Denies.
8. Defendant lacks information sufficient to admit or deny, and therefore denies.
9. Defendant lacks information sufficient to admit or deny, and therefore denies.
10. Denies.
11. Defendant lacks information sufficient to admit or deny, and therefore denies.
12. Defendant lacks information sufficient to admit or deny, and therefore denies.
13. Denies.
14. Defendant lacks information sufficient to admit or deny, and therefore denies.
15. Defendant lacks information sufficient to admit or deny, and therefore denies.
16. Denies.
17. Denies that Defendant is not authorized to control the Domain Name, otherwise admits.
18. Defendant lacks information sufficient to admit or deny, and therefore denies.
19. Defendant repeats and realleges his answers to the preceding paragraphs of this Complaint, as though fully set forth herein.
20. Denies.
21. Defendant lacks information sufficient to admit or deny, and therefore denies.
22. Denies.

WHEREFORE, the Defendant requests the following relief:

1. That the Plaintiff's claim be dismissed with prejudice and that the requested relief

be denied.

2. That the Court award the Defendant its costs in defending this action.
3. That the Court grant such other relief as is just under the circumstances.

AFFIRMATIVE DEFENSE: LACHES

Plaintiff's delay in pursuing its claims with respect to the Domain Name has resulted in tremendous prejudice to the Defendant, who in good faith purchased the Domain Name at public auction. If the Domain Name was indeed "hacked," as Plaintiff suggests, a simple and timely request to the registrar and/or the auction house would have prevented the need for the present litigation.

Date: October 4, 2021

Respectfully submitted,

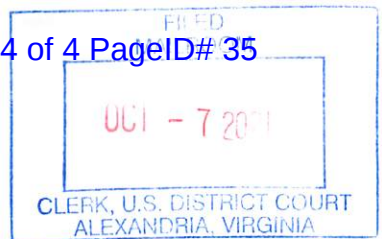


DASHIELL SHAPIRO

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing

(1) Answer, was mailed

this (2) 4th Day of (3) October 2021, to (4) Timothy Wang (Plaintiff's

Counsel) and Steven War (Plaintiff's Counsel) at (5) twang@nilawfirm.com and

steve@wariplaw.com.


(Your Signature)

Instructions

YOU must send a copy of every motion, pleading or document to the defendant(s) or counsel for defendant(s). If you do not send a copy to the defendant(s) or counsel for the defendant(s), the court will not be able to consider your document.

You must prepare and submit one certificate of service for EACH motion, pleading, or document you wish to have considered by the court.

Complete each blank as directed:

(1) Describe the document you are submitting to the court and sending to the defendant(s). (Remember: you should attach a Certificate of Service to each motion, pleading, or document you wish to have considered by the court.)

(2) Day of the month that you give the document to officials for mailing to the defendant(s) or counsel for the defendant(s).

(3) Month and year.

(4) Name of person(s) to whom you are sending a copy of the document. If you send it directly to the defendant(s), list each defendant to whom you send a copy. If you send it to counsel for the defendant(s), list only the name(s) of counsel.

(5) Address(es) that copy is being mailed to.

NOTE: YOU MUST SIGN THIS FORM. The court will not accept this form without an original signature.