

Complaint Transmittal Cover Sheet

To: NANJING IMPERIOSUS TECHNOLOGY CO. LTD., Respondent & Registrar

From: THOMAS BUSINESS LAW GROUP, P.C., Attorney for Complainant

Cc: National Arbitration Forum, Stefan Hansmann, Tamara Schuechter, Manfred Muench, Moshe Fogel, Kirk Wade, Belinda Eskenasy, info@justBelieveonline.com, postmaster@envatomarketplaces.com, postmaster@theforest.net, postmaster@justbelieve.com, support@domainerschoice.com

Date: March 4, 2014

Re: www.justbelieve.com

The attached Complaint is being filed against you with the National Arbitration Forum (the "Forum") pursuant to the Uniform Domain Name Dispute Resolution Policy (the "Policy") adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN") on October 24, 1999 and incorporated in your Registration Agreement with the Registrar of your domain name(s). By submitting this Complaint to the Forum, the Complainant agrees to abide and be bound by the provisions of the Policy, the ICANN Rules, and the Forum's Supplemental Rules.

Until you are notified by the Forum that a proceeding has commenced, you have no duty to act with regard to this Complaint.

- The Forum will examine the Complaint to determine whether it conforms to the ICANN Policy, Rules, and the Supplemental Rules.
- If the Complaint conforms to those standards, the Forum will forward an official copy of the Complaint to you.
- *Once the official Complaint is forwarded to you*, you will have **twenty (20)** calendar days to submit a Response to both the Forum and the Complainant in accordance with the Policy, Rules, and Supplemental Rules.
- You may seek legal assistance to represent you in this administrative proceeding.

The Policy and Rules governing this proceeding can be found at:

ICANN UDRP Policy	http://www.icann.org/udrp/udrp-policy-24oct99.htm
ICANN UDRP Rules	http://www.icann.org/udrp/udrp-rules-24oct99.htm
Forum Supplemental Rules	http://domains.adrforum.com/main.aspx?itemID=631&hideBar=False&navID=237&news=26

Complainant has opted to file this complaint entirely electronically as provided in the UDRP Rules as effective March 1, 2010. Respondent may also choose to take advantage of the new Rules.

ICANN New UDRP Rules	http://www.icann.org/en/dndr/udrp/uniform-rules.htm
Forum New Supplemental Rules	http://domains.adrforum.com/resource.aspx?id=1540

Alternatively, you may contact the Forum to obtain any of the above documents.

Telephone: (800) 474-2371 or (952) 516-6400
E-mail: domaindispute@adrforum.com

Please provide the Forum with the email address where the official Complaint and other communications in the administrative proceeding should be sent.

Stephen J. Thomas (Bar No. 120751)
THOMAS BUSINESS LAW GROUP, P.C.
17800 Castleton Street, Suite 657
City of Industry, CA 91748
Telephone: (626) 771-1005
Facsimile: (626) 628-1905

Attorney for Complainant
Life Is Now, Inc.



LIFE IS NOW, INC., P.O. Box 5005, No. 80
Rancho Santa Fe, California, 92067

(Complainant)

v.

Domain Name In Dispute:
www.justbelieve.com

NANJING IMPERIOUSUS TECHNOLOGY
CO. LTD,

(Respondent)

COMPLAINT IN ACCORDANCE WITH

THE UNIFORM DOMAING DISPUTE RESOLUTION POLICY

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (UDRP), adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999 and the Rules for Uniform Domain Name Dispute Resolution Policy (UDRP Rules), with an effective date of March 1, 2010, and the National Arbitration Forum (FORUM) Supplemental Rules (Supp. Rules). UDRP Rule 3(b)(i).

1 **[2.] COMPLAINANT INFORMATION**

2 [a.] Name: Life Is Now, Inc.
3 [b.] Address: P.O. Box 5005, No. 80,
4 Rancho Santa Fe, California, 90267
5 [c.] Telephone:
6 [d.] Fax:
7 [e.] E-Mail:

8 **[3.] COMPLAINANT AUTHORIZED REPRESENTATIVE**

9 [a.] Name: Thomas Business Law Group, P.C.
10 [b.] Address: 17800 Castleton Street, Suite 657
11 City of Industry, California, 91748
12 [c.] Telephone: (626) 771-1005
13 [d.] Fax: (626) 628-1905
14 [e.] E-Mail: sjt@corporatefirm.com

15 **Complainant's preferred contact person for correspondence relating to this case:**

16 [a.] Contact Name: Stephen J. Thomas
17 [b.] Contact Email: sjt@corporatefirm.com

18 The Complainant chooses to have this dispute heard before a:

19 X *single-member administrative panel*; _____ *three member administrative panel*.

20 ICANN Rule 3 (b)(iv).

21 **[4.] RESPONDENT INFORMATION**

22 [a.] Name: Nanjing Imperious Technology Co., Ltd.
23 [b.] Address: Splendid Times Building, Office 1004, 139 Hanzhong
24 Road, Nanjing, 210004, P.R. China
25 [c.] Telephone:
26 [d.] Fax:
27 [e.] E-mail: stefan@domainerschoice.com

1 **[5.] DISPUTED DOMAIN NAME**

2 [a.] The following domain name is the subject of this Complaint:
3 ICANN Rule 3(b)(vi).

4 justbelieve.com

5 [b.] Registrar Information: UDRP Rule 3(b)(vii)

6 [i.] Registrar's Name: Nanjing Imperiosus Technology Co., Ltd.

7 [ii.] Registrar Address: Splendid Times Building, Office 1004, 139
8 Hanzhong Lu, Nanjing Jiangsu, 210004,
9 China

10 [iii.] Telephone Number: +86 25 8475 2362 ext. 166

11 [iv.] E-Mail Address: stefan@domainerschoice.com

12 [c.] Trademark/Service Mark Information: ICANN Rule 3(b)(viii). The
13 following Registered Trademarks are owned by Complainant LIFE IS NOW,
14 INC. and are in use by Complainant LIFE IS NOW, INC. in connection with its
15 on-going business activities. The "justbelieve.com" domain name is confusingly
16 similar, tarnish and dilute the following mark:

<u>Trademark</u>	<u>Registration No.</u>	<u>Goods and Services</u>
Just Believe	3783336	IC 041. US 100 101 107. G & S: Education services, namely, providing seminars in the fields of business; Personal coaching services in the field of business; Professional coaching services in the field of business. FIRST USE: 20030100. FIRST USE IN COMMERCE: 20030100

27 See Exhibit A

1 **[6.] FACTUAL AND LEGAL GROUNDS**

2 This complaint is based on the following factual and legal grounds: ICANN Rule
3 3(b)(ix).

4 [a.] *The domain name is identical or confusingly similar to a trademark or service*
5 *mark in which the Complainant has rights.* UDRP Rule 3(b)(ix)(1); UDRP Policy ¶
6 4(a)(ii). Complainant LIFE IS NOW, INC. is in the business of professional and personal
7 coaching. Complainant LIFE IS NOW, INC. has used the JUST BELIEVE mark since at
8 least 2003. The “justbelieve.com” domain name is confusingly similar to the JUST
9 BELIEVE mark.

10 [b.] *The Respondent (domain-name holder) should be considered as having no rights*
11 *or legitimate interests in respect of the domain name that is the subject of the complaint.*
12 UDRP Rule 3(b)(ix)(2); UDRP Policy ¶ 4(c). Respondent owns the offending domain,
13 which resolves to one of four different homepages with different domain names, attached
14 as Exhibit B, C, D, and E. The actual domain, “justbelieve.com” could not be reached.
15 Each offending website has “justbelieve” as part of the domain name, and identifies
16 themselves by using “just believe” as part of their webpage name.

17 [c.] *The domain name should be considered as having been registered and been used*
18 *in bad faith.* UDRP Rule 3(b)(ix)(3); UDRP Policy ¶ 4(a)(iii) Each offending website has
19 “justbelieve” as part of the domain name, and identifies themselves by using “just
20 believe” as part of their webpage name. The “justbelieve.com” domain name and the
21 “Just Believe” tags at the top of each of the websites demonstrate that Respondent has
22 intentionally attempted to attract, possibly for commercial gain, Internet users to
23 Respondent’s website, by creating a likelihood of confusion with the Complainant’s mark
24 as to the source, sponsorship, affiliation, or endorsement of Respondent’s websites or
25 comments.

26 **[7.] REMEDY SOUGHT**

1 The Complainant LIFE IS NOW, INC. requests that the Panel issue a decision that the
2 domain-name registration be transferred to LIFE IS NOW, INC. UDRP Rule 3(b)(x).

3 **[8.] OTHER LEGAL PROCEEDINGS**

4 Two other legal proceedings were filed and voluntarily dismissed in connection with or
5 relation to the domain name that is the subject of the complaint when the ownership of the
6 domain was transferred. They were filed in the Central District of California and are as follows:
7 LIFE IS NOW INC. v. INTERNET.BS CORP, a business of unknown type; GREGG MCNAIR,
8 an individual; and MARC RINUADO, an individual. Case No. 2:12-cv-10955-PSG-PLA
9 LIFE IS NOW INC. v. FUNDACION PRIVATE WHOIS, a business of unknown type; and
10 DOES 1 through 10 inclusive. Case No. 2:13-cv-00888-PSG-RNB
11 UDRP Rule 3(b)(xi).

12 **[9.] COMPLAINT TRANSMISSION**

13 The Complainant asserts that a copy of this Complaint, together with the cover sheet as
14 prescribed by FORUM's Supplemental Rules, has been sent or transmitted to the Respondent
15 (domain-name holder), in according with UDRP Rule 2(b) and to the Registrar(s) of the domain
16 name(s), in accordance with FORUM Supp. Rule 4(d)(i). UDRP Rule 3(b)(xii).

17 **[10.] MUTUAL JURISDICTION**

18 The Complainant will submit, with respect to any challenges to a decision in the
19 administrative proceeding cancelling or transferring the domain name, to:

20 X a) *the location of the principal office of the concerned registrar or*
21 b) *where the Respondent is located, as shown by the address(es) given for the domain*
22 *name holder in the Whois Database at the time of the submission of the Complaint to FORUM.*
23 UDRP Rule 3(b)(xiii).

24 **[11.] CERTIFICATION**

25 Complainant LIFE IS NOW, INC. agrees that its claims and remedies concerning the
26 registration of the domain name, the dispute, or the dispute's resolution shall be solely against
27 the domain-name holder and waives all such claims and remedies against (a) the National
28

1 Arbitration Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar,
2 (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and
3 Numbers, as well as their directors, officers, employees, and agents.

4 Complainant certifies that the information contained in this Complaint is to the best of
5 Complaint's knowledge complete and accurate, that this Complaint is not being presented for
6 any improper purpose, such as to harass, and that the assertions in this Complaint are warranted
7 under these Rules and under applicable law, as it now exists or as it may be extended by a good-
8 faith and reasonable argument.

9 Respectfully submitted,

10 THOMAS BUSINESS LAW GROUP, P.C.

11 

12 By: Stephen J. Thomas
13 Attorney for Complainant
14 Life Is Now, Inc.

15 Dated: March 3, 2014

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EXHIBIT A



United States Patent and Trademark Office

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Just Believe

Word Mark JUST BELIEVE

Goods and Services IC 041. US 100 101 107. G & S: Education services, namely, providing seminars in the field of business; Personal coaching services in the field of business; Professional coaching services in the field of business. FIRST USE: 20030100. FIRST USE IN COMMERCE: 20030100

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 77656038

Filing Date January 25, 2009

Current Basis 1A

Original Filing Basis 1A

Published for Opposition February 16, 2010

Registration Number 3783336

Registration Date May 4, 2010
Owner (REGISTRANT) Life Is Now, Inc. CORPORATION ILLINOIS PO Box 5005, No. 80 Rancho Santa Fe CALIFORNIA 92067
Attorney of Record Sepehr Daghighian, Esq.
Type of Mark SERVICE MARK
Register PRINCIPAL
Live/Dead Indicator LIVE

TESS HOME	NEW USER	STRUCTURED	FREE FORM	BROWSE DICT	SEARCH OG	TOP	HELP	PREV LIST	CURR LIST
NEXT LIST	FIRST DOC	PREV DOC	NEXT DOC	LAST DOC					

[| HOME](#) | [SITE INDEX](#) | [SEARCH](#) | [eBUSINESS](#) | [HELP](#) | [PRIVACY POLICY](#)

EXHIBIT B



Website Temporarily Down For Product Maintenance
Please come back and visit us soon.

Have questions? Email us at: info@justBelieveonline.com



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EXHIBIT C



just believe ministries

P.O. Box 264
New Haven, IN 46774
Phone: 260-748-4317

THE INTERNATIONAL EVANGELISTIC MINISTRY OF KIRK AND JANELLE WADE

"possible if You 'Just Believe'!"

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bring unity to the body
of Christ, and to come
in
agreement that Jesus
Christ is Lord to the
glory of God the father,
and
that all things are
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A-7

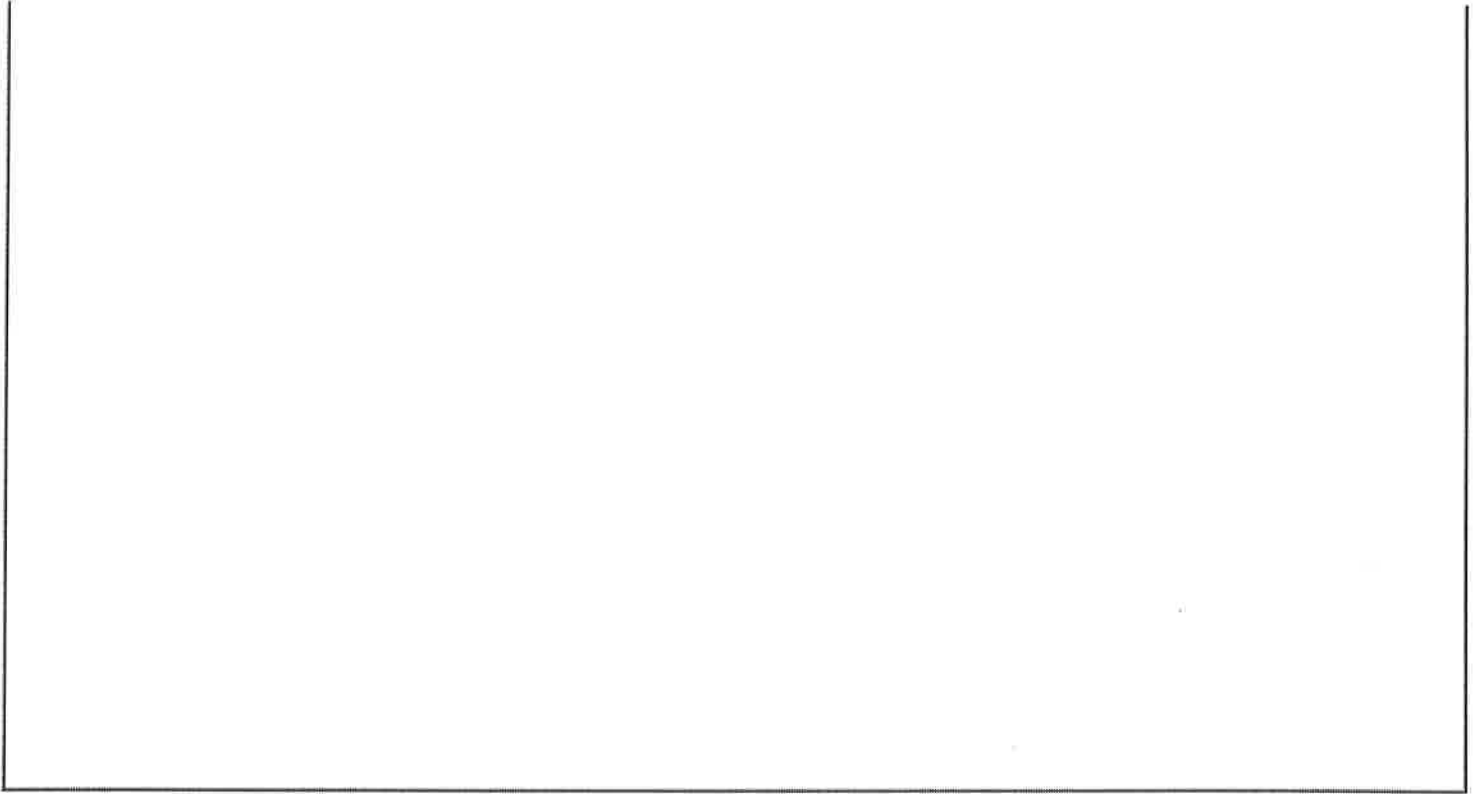


EXHIBIT D

JUST BELIEVE *by Belinda*

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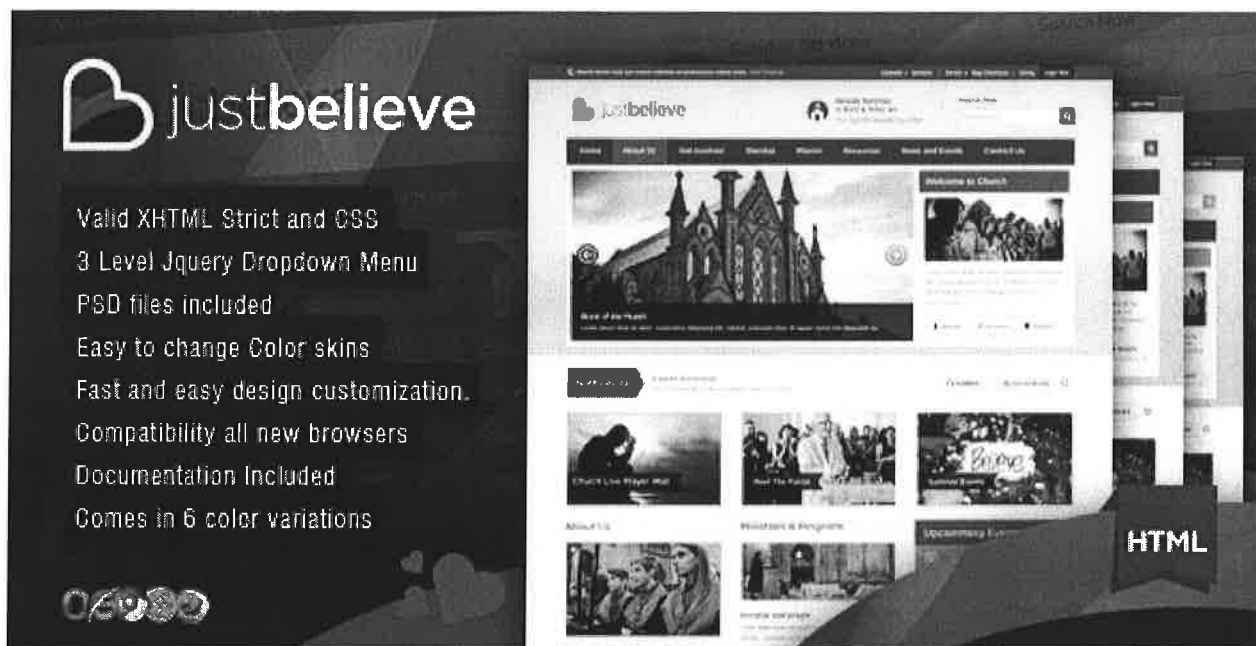
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EXHIBIT E

[Home](#) [Files](#) [Site Templates](#) [Nonprofit Churches](#)

Just Believe Church and NGO Template

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JustBelieve is an html template specially designed for Church, NGO and non profit websites. This template is easy to modify and ready to be up and running out of the box. The Home page PSD file included have been customized to allow fast skinning.

Main Features

1. Valid XHTML Strict and CSS
2. 2 Level Dropdown Menu , improved with JQuery
3. Home page PSD files included
4. Easy to change Color skins with custom graphics
5. 5 different layout alignment options
6. Compatibility all new browsers
7. Documentation Included
8. Quality source Code nicely formatted and commented to make editing this template as easy as possible.

This template comes in 6 pre made color variations: red, blue, gray, green, orange and brown. But it will only take one minute to create your desired color schemes

Files Included

A-12

1. Home
2. Blog
3. Blog Detail
4. Events
5. Sermons
6. Gallery Grid View
7. Gallery Slide Show
8. Contact Us

Documentation / Support

The item documentation is extensive and the source code is properly commented and formatted, so you shouldn't have any problem working with this item.

If you need support, please send me an email using the contact form on my user account page.

Please include the theme name, website URL and detailed information about your problem.

I usually respond to support requests within **24 hours** on weekdays, depending on the number of requests in queue.

Support request sent during weekends/holidays will be processed on Monday/the next business day.

Thank you for reading 😊



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A-14

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by
by
by
by
by

Internet Corporation for Assigned Names and Numbers

HELP (/EN/HELP) › DOMAIN NAME DISPUTE RESOLUTION (/EN/HELP/DNDR)

Uniform Domain Name Dispute Resolution Policy

928

[Deutsch \(/de/help/dndr/udrp/policy\)](/de/help/dndr/udrp/policy)

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[العربية \(/ar/help/dndr/udrp/policy\)](/ar/help/dndr/udrp/policy)

Policy Adopted: August 26, 1999

Implementation Documents Approved: October 24, 1999

Notes:

1. This policy is now in effect. See www.icann.org/udrp/udrp-schedule.htm (/udrp/udrp-schedule.htm) for the implementation schedule.
2. This policy has been adopted by all ICANN-accredited registrars. It has also been adopted by certain managers of country-code top-level domains (e.g., .nu, .tv, .ws).
3. The policy is between the registrar (or other registration authority in the case of a country-code top-level domain) and its customer (the domain-name holder or registrant). Thus, the policy uses "we" and "our" to refer to the registrar and it uses "you" and "your" to refer to the domain-name holder.

Uniform Domain Name Dispute Resolution Policy

(As Approved by ICANN (Internet Corporation for Assigned Names and Numbers) on October 24, 1999)

1. Purpose. This Uniform Domain Name Dispute Resolution Policy (the "Policy") has been adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN (Internet Corporation for Assigned Names and Numbers)"), is incorporated by reference into your Registration Agreement, and sets forth the terms and conditions in connection with a dispute between you and any party other than us (the registrar) over the registration and use of an Internet domain name registered by you. Proceedings under Paragraph 4 of this Policy will be conducted according to the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules of Procedure"), which are available at <http://www.icann.org/en/dndr/udrp/uniform-rules.htm> (/dndr/udrp/uniform-rules.htm), and the selected administrative-dispute-resolution service provider's supplemental rules.

2. Your Representations. By applying to register a domain name, or by asking us to maintain or renew a domain name registration, you hereby represent and warrant to us that (a) the statements that you made in your Registration Agreement are complete and accurate; (b) to your knowledge, the registration of the domain name will not infringe

upon or otherwise violate the rights of any third party; (c) you are not registering the domain name for an unlawful purpose; and (d) you will not knowingly use the domain name in violation of any applicable laws or regulations. It is

your responsibility to determine whether your domain name registration infringes or violates someone else's rights.

3. Cancellations, Transfers, and Changes. We will cancel, transfer or otherwise make changes to domain name registrations under the following circumstances:

- a. subject to the provisions of Paragraph 8, our receipt of written or appropriate electronic instructions from you or your authorized agent to take such action;
- b. our receipt of an order from a court or arbitral tribunal, in each case of competent jurisdiction, requiring such action; and/or
- c. our receipt of a decision of an Administrative Panel requiring such action in any administrative proceeding to which you were a party and which was conducted under this Policy or a later version of this Policy adopted by ICANN (Internet Corporation for Assigned Names and Numbers). (See Paragraph 4(i) and (k) below.)

We may also cancel, transfer or otherwise make changes to a domain name registration in accordance with the terms of your Registration Agreement or other legal requirements.

4. Mandatory Administrative Proceeding.

This Paragraph sets forth the type of disputes for which you are required to submit to a mandatory administrative proceeding. These proceedings will be conducted before one of the administrative-dispute-resolution service providers listed at www.icann.org/en/dndr/udrp/approved-providers.htm (/en/dndr/udrp/approved-providers.htm) (each, a "Provider").

a. Applicable Disputes. You are required to submit to a mandatory administrative proceeding in the event that a third party (a "complainant") asserts to the applicable Provider, in compliance with the Rules of Procedure, that

- (i) your domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- (ii) you have no rights or legitimate interests in respect of the domain name; and
- (iii) your domain name has been registered and is being used in bad faith.

In the administrative proceeding, the complainant must prove that each of these three elements are present.

b. Evidence of Registration and Use in Bad Faith. For the purposes of Paragraph 4(a)(iii), the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

- (i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark

excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.

c. How to Demonstrate Your Rights to and Legitimate Interests in the Domain Name in Responding to a Complaint. When you receive a complaint, you should refer to Paragraph 5 (/dndr/udrp/uniform-rules.htm#5) of the Rules of Procedure in determining how your response should be prepared. Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate your rights or legitimate interests to the domain name for purposes of Paragraph 4(a)(ii):

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

d. Selection of Provider. The complainant shall select the Provider from among those approved by ICANN (Internet Corporation for Assigned Names and Numbers) by submitting the complaint to that Provider. The selected Provider will administer the proceeding, except in cases of consolidation as described in Paragraph 4(f).

e. Initiation of Proceeding and Process and Appointment of Administrative Panel. The Rules of Procedure state the process for initiating and conducting a proceeding and for appointing the panel that will decide the dispute (the "Administrative Panel").

f. Consolidation. In the event of multiple disputes between you and a complainant, either you or the complainant may petition to consolidate the disputes before a single Administrative Panel. This petition shall be made to the first Administrative Panel appointed to hear a pending dispute between

the parties. This Administrative Panel may consolidate before it any or all such disputes in its sole discretion, provided that the disputes being consolidated are governed by this Policy or a later version of this Policy adopted by ICANN (Internet Corporation for Assigned Names and Numbers).

g. Fees. All fees charged by a Provider in connection with any dispute before an Administrative Panel pursuant to this Policy shall be paid by the complainant, except in cases where you elect to expand

the Administrative Panel from one to three panelists as provided in Paragraph 3(b)(iv) (/dnidr/udrp/uniform-rules.htm#5biv) of the Rules of Procedure, in which case all fees will be split evenly by you and the complainant.

h. Our Involvement in Administrative Proceedings. We do not, and will not, participate in the administration or conduct of any proceeding before an Administrative Panel. In addition, we will not be liable as a result of any decisions rendered by the Administrative Panel.

i. Remedies. The remedies available to a complainant pursuant to any proceeding before an Administrative Panel shall be limited to requiring the cancellation of your domain name or the transfer of your domain name registration to the complainant.

j. Notification and Publication. The Provider shall notify us of any decision made by an Administrative Panel with respect to a domain name you have registered with us. All decisions under this Policy will be published in full over the Internet, except when an Administrative Panel determines in an exceptional case to redact portions of its decision.

k. Availability of Court Proceedings. The mandatory administrative proceeding requirements set forth in Paragraph 4 shall not prevent either you or the complainant from submitting the dispute to a court of competent jurisdiction for independent resolution before such mandatory administrative proceeding is commenced or after such proceeding is concluded. If an Administrative Panel decides that your domain name registration should be canceled or transferred, we will wait ten (10) business days (as observed in the location of our principal office) after we are informed by the applicable Provider of the Administrative Panel's decision before implementing that decision. We will then implement the decision unless we have received from you during that ten (10) business day period official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) that you have commenced a lawsuit against the complainant in a jurisdiction to which the complainant has submitted under Paragraph 3(b)(xiii) (/dnidr/udrp/uniform-rules.htm#3bxiii) of the Rules of Procedure. (In general, that jurisdiction is either the location of our principal office or of your address as shown in our Whois database. See Paragraphs 1 (/dnidr/udrp/uniform-rules.htm#1MutualJurisdiction) and 3(b)(xiii) (/dnidr/udrp/uniform-rules.htm#3bxiii) of the Rules of Procedure for details.) If we receive such documentation within the ten (10) business day period, we will not implement the Administrative Panel's decision, and we will take no further action, until we receive (i) evidence satisfactory to us of a resolution between the parties; (ii) evidence satisfactory to us that your lawsuit has been dismissed or withdrawn; or (iii) a copy of an order from such court dismissing your lawsuit or ordering that you do not have the right to continue to use your domain name.

5. All Other Disputes and Litigation. All other disputes between you and any party other than us regarding your domain name registration that are not brought pursuant to the mandatory administrative proceeding provisions of Paragraph 4 shall be resolved between you and such other party through any court, arbitration or other proceeding that may be available.

6. Our Involvement in Disputes. We will not participate in any way in any dispute between you and any party other than us regarding the registration and use of your domain name. You shall not name us as a party or otherwise include us in any such proceeding. In the event that we are named as a party in any such proceeding, we reserve the right to raise any and all defenses deemed appropriate, and to take any other action necessary to defend ourselves.

7. Maintaining the Status Quo. We will not cancel, transfer, activate, deactivate, or otherwise change the status of any domain name registration under this Policy except as provided in Paragraph 3 above.

8. Transfers During a Dispute.

a. Transfers of a Domain Name to a New Holder. You may not transfer your domain name registration to another holder (i) during a pending administrative proceeding brought pursuant to

Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded; or (ii) during a pending court proceeding or arbitration commenced regarding your domain name unless the party to whom the domain name registration is being transferred agrees, in writing, to be bound by the decision of the court or arbitrator. We reserve the right to cancel any transfer of a domain name registration to another holder that is made in violation of this subparagraph.

b. Changing Registrars. You may not transfer your domain name registration to another registrar during a pending administrative proceeding brought pursuant to Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded. You may transfer administration of your domain name registration to another registrar during a pending court action or arbitration, provided that the domain name you have registered with us shall continue to be subject to the proceedings commenced against you in accordance with the terms of this Policy. In the event that you transfer a domain name registration to us during the pendency of a court action or arbitration, such dispute shall remain subject to the domain name dispute policy of the registrar from which the domain name registration was transferred.

9. Policy Modifications. We reserve the right to modify this Policy at any time with the permission of ICANN (Internet Corporation for Assigned Names and Numbers). We will post our revised Policy at <URL (Uniform Resource Locator)> at least thirty (30) calendar days before it becomes effective. Unless this Policy has already been invoked by the submission of a complaint to a Provider, in which event the version of the Policy in effect at the time it was invoked will apply to you until the dispute is over, all such changes will be binding upon you with respect to any domain name registration dispute, whether the dispute arose before, on or after the effective date of our change. In the event that you object to a change in this Policy, your sole remedy is to cancel your domain name registration with us, provided that you will not be entitled to a refund of any fees you paid to us. The revised Policy will apply to you until you cancel your domain name registration

Dispute Resolution (/en/help/dispute-resolution)

Domain Name Dispute Resolution (/en/help/dndr)

Charter Eligibility Dispute Resolution Policy (/en/help/dndr/cedrp)

Eligibility Requirements Dispute Resolution Policy (/en/help/dndr/erdrp)

Intellectual Property Defensive Registration Challenge Policy (/en/help/dndr/ipdrp)

Qualification Challenge Policy (/en/help/dndr/proqcp)

Restrictions Dispute Resolution Policy (/en/help/dndr/rdrp)

Transfer Dispute Resolution Policy (/en/help/dndr/tdrp)

Uniform Domain Name Dispute Resolution Policy (/en/help/dndr/udrp)

Policy Document (/en/help/dndr/udrp/policy)

Providers (/en/help/dndr/udrp/providers)

Provider Approval Process (/en/help/dndr/udrp/provider-approval-process)

Rules (/en/help/dndr/udrn/rules)

Whois Search Results

Search again (.aero, .arpa, .asia, .biz, .cat, .com, .coop, .edu, .info, .int, .jobs, .mobi, .museum, .name, .net, .org, .pro, or .travel) :

- ☒ Domain (ex. internic.net)
- ☐ Registrar (ex. ABC Registrar, Inc.)
- ☐ Nameserver (ex. ns.example.com or 192.16.0.192)

Whois Server Version 2.0

Domain names in the .com and .net domains can now be registered with many different competing registrars. Go to <http://www.internic.net> for detailed information.

Domain Name: JUSTBELIEVE.COM
Registrar: NANJING IMPERIOSUS TECHNOLOGY CO. LTD.
Whois Server: whois.communigal.net
Referral URL: <http://www.DomainersChoice.com>
Name Server: NS3.DOMAINMANAGER.COM
Name Server: NS4.DOMAINMANAGER.COM
Status: clientTransferProhibited
Updated Date: 24-may-2013
Creation Date: 24-sep-1999
Expiration Date: 24-sep-2017

>>> Last update of whois database: Mon, 03 Mar 2014 19:59:44 UTC <<<

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.

TERMS OF USE: You are not authorized to access or query our Whois database through the use of electronic processes that are high-volume and automated except as reasonably necessary to register domain names or modify existing registrations; the Data in VeriSign Global Registry Services' ("VeriSign") Whois database is provided by VeriSign for information purposes only, and to assist persons in obtaining information about or related to a domain name registration record. VeriSign does not guarantee its accuracy. By submitting a Whois query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail, telephone,

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or facsimile; or (2) enable high volume, automated, electronic processes that apply to VeriSign (or its computer systems). The compilation, repackaging, dissemination or other use of this Data is expressly prohibited without the prior written consent of VeriSign. You agree not to use electronic processes that are automated and high-volume to access or query the Whois database except as reasonably necessary to register domain names or modify existing registrations. VeriSign reserves the right to restrict your access to the Whois database in its sole discretion to ensure operational stability. VeriSign may restrict or terminate your access to the Whois database for failure to abide by these terms of use. VeriSign reserves the right to modify these terms at any time.

The Registry database contains ONLY .COM, .NET, .EDU domains and Registrars.

Report Inaccurate Whois listing

This page last updated 01/24/2003

Whois Search Results

Search again (.aero, .arpa, .asia, .biz, .cat, .com, .coop, .edu, .info, .int, .jobs, .mobi, .museum, .name, .net, .org, .pro, or .travel) :

- ☒ Domain (ex. internic.net)
- ☐ Registrar (ex. ABC Registrar, Inc.)
- ☐ Nameserver (ex. ns.example.com or 192.16.0.192)

Whois Server Version 2.0

Domain names in the .com and .net domains can now be registered with many different competing registrars. Go to <http://www.internic.net> for detailed information.

Registrar Name: NANJING IMPERIOSUS TECHNOLOGY CO. LTD.
Address: Splendid Times Bld., Office 1004 139 Hanzhong Lu, Nanjing, Jiangsu 210004, CN
Phone Number: +86 25 8475 2362 ext. 166
Email: stefan@domainerschoice.com
Whois Server: whois.communigal.net
Referral URL: www.DomainersChoice.com
Admin Contact: Stefan Hansmann
Phone Number: +86 25 84752362 Ext. 166
Email: stefan@domainerschoice.com
Admin Contact: Tamara . Schuechter
Phone Number: +49 8969394304
Email: tamaras@800name.com
Billing Contact: Stefan Hansmann
Phone Number: +86 25 84752362 Ext. 166
Email: stefan@domainerschoice.com
Billing Contact: Tamara . Schuechter
Phone Number: +49 8969394304
Email: tamaras@800name.com
Technical Contact: Manfred Muench
Phone Number: +86.15005146262
Email: docmanni@domainerschoice.com
Technical Contact: Moshe . Fogel
Phone Number: +972 544685 714
Email: moshef@galcomm.com

>>> Last update of whois database: Mon, 03 Mar 2014 20:11:38 UTC <<<

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.

TERMS OF USE: You are not authorized to access or query our Whois database through the use of electronic processes that are high-volume and

automated except as reasonably necessary to register domain names or modify existing registrations; the Data in VeriSign Global Registry Services' ("VeriSign") Whois database is provided by VeriSign for information purposes only, and to assist persons in obtaining information about or related to a domain name registration record. VeriSign does not guarantee its accuracy. By submitting a Whois query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail, telephone, or facsimile; or (2) enable high volume, automated, electronic processes that apply to VeriSign (or its computer systems). The compilation, repackaging, dissemination or other use of this Data is expressly prohibited without the prior written consent of VeriSign. You agree not to use electronic processes that are automated and high-volume to access or query the Whois database except as reasonably necessary to register domain names or modify existing registrations. VeriSign reserves the right to restrict your access to the Whois database in its sole discretion to ensure operational stability. VeriSign may restrict or terminate your access to the Whois database for failure to abide by these terms of use. VeriSign reserves the right to modify these terms at any time.

The Registry database contains ONLY .COM, .NET, .EDU domains and Registrars.

Report Inaccurate Whois listing

This page last updated 01/24/2003

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The Accredited Registrar Directory:

The information that appears for each registrar, including the referral web address and contact information, has been provided by each individual registrar.

Registrar Contact Information2009
RAA**Nanjing Imperiosus Technology Co. Ltd.**

Splendid Times Bld., Office 1004

139 Hanzhong Lu

Nanjing Jiangsu 210004

China

+86 25 8475 2362 ext. 166

info@domainerschoice.com

This page last updated on Monday, 03-March-2014

1 PROOF OF SERVICE)

2 STATE OF CALIFORNIA) SS.

3 COUNTY OF LOS ANGELES)

4
5 X The undersigned, an employee of THOMAS BUSINESS LAW GROUP, P.C., hereby
6 on oath states:

7 that a copy of the foregoing **Complaint Regarding Domain Name www.justbelieve.com** was
8 served upon the registrar record by depositing a copy of same enclosed in an envelope addressed
9 as follows:

10 Nanjing Imperiosus Technology Co. Ltd.
11 Splendid Times Building, Office 1004
12 139 Hanzhong Lu
13 Nanjing Jiangsu 21004
14 China

15 and:

16 X by depositing said envelope with first-class postage fully prepaid in the U.S. Mail
17 at City of Industry, California;

18 _____ by facsimile

19 _____ by causing same to be hand-delivered to the same address;

20 on March 4, 2014

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed on March 4, 2014 at City of Industry, California.

24 
25 _____
26 Alston Wen
27
28

1 PROOF OF SERVICE)

2 STATE OF CALIFORNIA) SS.

3 COUNTY OF LOS ANGELES)

4
5 X The undersigned, an employee of THOMAS BUSINESS LAW GROUP, P.C., hereby
6 on oath states:

7 that a copy of the foregoing **Complaint Regarding Domain Name www.justbelieve.com** was
8 served upon the following parties by e-mail transmission to the following addresses:

9 Stefan Hansmann
10 Admin & Billing Contact
Nanjing Imperiosus Technology Co. Ltd.
Stefan@domainerschoice.com

Tamara Schuechter
Admin & Billing Contact
Nanjing Imperiosus Technology Co. Ltd.
tamaras@800name.com

11 Manfred Muench
12 Technical Contact
Nanjing Imperiosus Technology Co. Ltd.
13 docmanni@domainerschoice.com

Moshe Fogel
Technical Contact
Nanjing Imperiosus Technology Co. Ltd.
moshef@galcomm.com

14 postmaster@justbelieve.com

support@domainerschoice.com

15 Kirk Wade
16 Just Believe Ministries
17 kirkjwade@aol.com

Belinda Eskenasy
Just Believe by Belinda
info@justbelievejewelry.com

18 Just Believe
19 justbelieveonline.com
info@justBelieveonline.com

Envato Marketplaces
postmaster@envatomarketplaces.com
postmaster@theforest.net

20 on March 4, 2014

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on March 4, 2014 at City of Industry, California.

25
26 
Alston Wen