**WORLD INTELLECTUAL PROPERTY ORGANIZATION**

**ARBITRATION AND MEDIATION CENTER**

|  |  |
| --- | --- |
| [Name and address of complainant as stated in complaint]  (Complainant) | Case No:  *[Indicate assigned case number]* |
| -v- | Disputed domain name |
| [Name and address of respondent]  (Respondent) | *[the disputed domain name]* |

#### RESPONSE

(Regulations, article 7)

##### I. Introduction

[1.] On *[indicate date on which the Notification of Complaint and Commencement of Proceedings was received]*, the respondent received a Notification of Complaint and Commencement of Proceedings from the World Intellectual Property Organization (WIPO) Arbitration and Mediation Center (the **center**) by *[e-mail/fax/post/courier]* informing the respondent that dispute resolution proceedings had been instituted by the complainant in accordance with the Dispute Resolution Regulations for .nl Domain Names (the **regulations**), effective as of February 28, 2008, as amended per December 31, 2013. Under the regulations, the center set *[insert date]* as the last day for the submission of a response by the respondent.

**II. Respondent’s Contact Details**

(Regulations, articles 7.2 and 16)

[2.] The respondent’s contact details are:

Name: *[Specify full name]*

E-mail: *[Specify e-mail address]*

Address: *[Specify postal address]*

Telephone: *[Specify telephone number]*

Fax: *[Specify fax number]*

[3.] The respondent’s authorized representative in these proceedings is:

*[If relevant, identify authorized representative and provide all contact details, including e-mail address, postal address, telephone number, fax number]*

[4.] The respondent’s preferred method of communications directed to the respondent in these proceedings is:

Electronic-only material

Method: e-mail

Address: *[Specify one e-mail address]*

Contact: *[Identify name of one contact]*

In the exceptional event, as mentioned in article 16.1, that communication by e-mail is impossible:

Material including hardcopy

Method: *[Specify one: fax, post/courier]*

Address: *[Specify one address]*

Fax: *[Specify one fax number]*

Contact: *[Identify name of one contact]*

**III. Response to Statements and Allegations Made in Complaint**

(Regulations, articles 2, 3 and 7)

*[Relevant documentation in support of the response should be submitted as annexes, with a schedule indexing such annexes]*

[5.] The respondent hereby responds to the statements and allegations made in the complaint and respectfully requests the panelist to deny the complaint.

*[Respond specifically to the statements and allegations contained in the complaint and include any and all bases for the respondent (registrant) to retain registration of the disputed domain name]*

**Note: a limit of 5,000 words is applicable for A., B. and C.**

**IV. Other Proceedings**

(Regulations, article 21)

[6.] *[If any, identify other proceedings, including court proceedings, that have been instituted or terminated in connection with or relating to the domain name that is the subject of the complaint and summarize the issues that are the subject of those proceedings]*

**V. Communications**

(Regulations, articles 7.2)

[7.] This response has been signed and submitted to the center in electronic form and the complainant is copied on this message.

#### VI. Certification

(Regulations, articles 7.2 and 24)

[8.] The respondent certifies that the information contained in this response is to the best of the respondent’s knowledge complete and accurate, and that the assertions in this response are warranted under the regulations.

**VII. Documents and/or Evidence**

(Regulations, article 7.2)

[9.] Respondent invokes the following list of documents and/or evidence to support this response:

Annex 1. *[identify document]*

Annex 2. *[identify document]*

Annex 3. *[identify document]*

etc.

Respectfully submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*[Name/Signature]*

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_