

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

SCOTT PETRETTA,

Plaintiff,

v.

Civil Action No. 1:20-cv-996-LO-TCB

GOCARS.COM, an Internet domain name,  
GODOCTOR.COM, an Internet domain name,  
GOELECTRIC.COM, an Internet domain name,  
GOFASHION.COM, an Internet domain name,  
GOGAMES.COM, an Internet domain name,  
GOGIFTS.COM, an Internet domain name,  
GONUCLEAR.COM, an Internet domain name,  
GOPARTS.COM, an Internet domain name,  
GOPARTY.COM, an Internet domain name,  
GORESTAURANTS.COM, an Internet domain  
name, GOSAFETY.COM, an Internet domain  
name, GOSALES.COM, an Internet domain  
name, GOSERVICE.COM, an Internet domain  
name, GOTOUR.COM, an Internet domain  
name, GOWEATHER.COM, an Internet domain  
name, MX4.COM, an Internet domain name, and  
JOHN DOE,

Defendants.

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF HIS MOTION FOR  
ORDER TO PUBLISH NOTICE OF ACTION**

Plaintiff Scott Petretta ("Plaintiff"), by counsel, submits this Memorandum of Law in Support of his Motion for an Order to publish notice of this action regarding the Internet Domain Names GOCARS.COM, GODOCTOR.COM, GOELECTRIC.COM, GOFASHION.COM, GOGAMES.COM, GOGIFTS.COM, GONUCLEAR.COM, GOPARTS.COM, GOPARTY.COM, GORESTAURANTS.COM, GOSAFETY.COM, GOSERVICE.COM,

GOTOUR.COM, GOWEATHER.COM, and MX4.com (collectively, “the Defendant domain names”) and directing the Defendant domain names and John Doe to plead by October 30, 2020.

## I. FACTS

On August 26, 2020, Plaintiff filed his Verified Complaint in this action (the “Complaint”) (ECF No. 1). The Complaint asserts claims under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d) (“ACPA”), the Computer Fraud and Abuse Act, 18 U.S.C. § 1030, the Electronic Communications Privacy Act, 18 U.S.C. §§ 2701, 2707, and related claims arising from the unauthorized access to Plaintiff’s secured computer account and the unauthorized transfer of the Defendant domain names.

Plaintiff Scott Petretta founded Multi-Force Corp.—also known as MX4—in 1988 as a technologies market research, project management, and web development firm. Compl. ¶ 31. Multi-Force published market research studies, held technology conferences, provided consulting services and developed several websites. *Id.* In 2001, Plaintiff registered the domain name MX4.COM, and used the MX4 mark and the MX4.com domain for two decades to promote and provide MX4’s technologies market research, project management, and web development services. *Id.* ¶ 35. Also in 2001, Plaintiff registered a number of GO domains, including GOCARS.COM, GODOCTOR.COM, GOEDUCATION.COM, GOELECTRIC.COM, GOFASHION.COM, GOGAMES.COM, GOGIFTS.COM, GONUCLEAR.COM, GOPARTS.COM, GOPARTY.COM, GORESTAURANTS.COM, GOSAFETY.COM, GOSALES.COM, GOSERVICE.COM, GOSYSTEMS.COM, GOTOUR.COM, GOTOYS.COM<sup>1</sup> (“the GO family of marks”). *Id.* ¶ 37. Plaintiff and MX4

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<sup>1</sup> Prior to filing the Complaint, Plaintiff made other attempts to recover the domain names, including contacting the new registrars to inform them that the domains had been stolen. (*Id.* ¶¶ 51-53). Three domains, GOSYSTEMS.COM, GOEDUCATION.COM, and GOTOYS.COM, were returned to Plaintiff, and are therefore not included as defendants in this action. (*Id.* ¶ 54).

used these domains as an additional way to identify and promote his services, providing links to and among his websites, and directing customers and potential customers to himself and MX4. *Id.* ¶ 39. MX4, as a separate corporate entity, recently became inactive, and Plaintiff, as its sole principal, acquired all of MX4's assets. *Id.* ¶ 32. Plaintiff, both in his individual capacity and through MX4, used the MX4 mark and the GO family of marks continuously in U.S. commerce in association with technologies market research, project management, and web development services until Defendant John Doe stole the domain names and thereby disabled Plaintiff's access to and control of the domain names. *Id.* ¶ 40. By virtue of this longstanding and continuous use in U.S. commerce, Plaintiff is entitled to common law trademark protection in the MX4 marks and the GO family of marks. *Id.* ¶ 41.

Plaintiff maintains a domain name management account with Dotster.com, ("Dotster"), a domain name registrar accredited by the Internet Corporation for Assigned Names and Numbers ("ICANN"). *Id.* ¶ 45. Plaintiff's domain name management account with Dotster is maintained on a protected computer and access to the account should be restricted to only those persons that possess Plaintiff's username and password. *Id.* ¶ 46.

Plaintiff recently reviewed his domain name management account with Dotster, and found that the MX4.COM and GO formative domain names had been transferred to various registrars. *Id.* ¶ 47. A search of Plaintiff's administrative e-mail account reveals that Plaintiff never received notifications that the Defendant domain names were being transferred. *Id.* Such domain name transfer notification emails are required by ICANN. *Id.*

On information and belief, John Doe obtained unauthorized access to Plaintiff's domain registrar account and manipulated the computer records to obtain the transfer of the Defendant domain names through an "account transfer" within Dotster or other surreptitious manner

intended to avoid detection by Plaintiff. *Id.* ¶ 48. On information and belief, John Doe prevented Plaintiff from receiving electronic communications seeking approval for the transfer of the Defendant domain names and obtained unauthorized access to such electronic communications so as to approve the transfer. *Id.* ¶ 49. When the Defendant domain names were transferred by John Doe without authorization, the domain name registrant information was changed and the technical settings for the domain name were changed thereby disabling Plaintiff's ability to control the domain names and associated websites. *Id.* ¶ 50.

ICANN Whois inquiries for the Defendant domain names do not provide any identifying information for the current registrant of any of the domains—each (to the extent there is more than one) employs a privacy service to conceal his/her/its identity. *Id.* Exs. A-P; Declaration of Adrienne J. Kosak (hereinafter, “Kosak Decl.”, attached hereto as Exhibit 1) ¶ 5. Due to concealment of the Whois information for the Defendant domain names, Plaintiff is unable to identify either a particular person or a particular address for the registrants. Kosak Decl. ¶ 8. Plaintiff requested that the current registrars of the Defendant domain names provide further information regarding the identity of the current registrant(s), but has not received any further information. *Id.* ¶ 7. Therefore, despite his diligence, Plaintiff has been unable to find any other person who would have been a defendant in a civil action under the ACPA. *Id.* ¶¶ 4-8. In these circumstances, the ACPA authorizes Plaintiff to proceed *in rem* against the domain name. *See* 15 U.S.C. § 1125(d)(2)(A)(ii)(II).

## II. ARGUMENT

As described below, service by publication and email is appropriate for each cause of action stated in the Complaint.

A. **The Court Should Permit Service by Publication and Email Under the ACPA.**

The ACPA provides that, for *in rem* actions such as this one, service of process shall be made by:

(aa) sending a notice of the alleged violation and intent to proceed under this paragraph to the registrant of the domain name at the postal and e-mail address provided by the registrant to the registrar; and

(bb) publishing notice of the action as the court may direct promptly after filing the action.

15 U.S.C. § 1125(d)(2)(A)(ii)(II). Plaintiff has complied with the requirements of subsection (aa) above. Plaintiff provided the current registrant(s) of the Defendant domain names with notice of the alleged violations and Plaintiff's intent to proceed *in rem* under the ACPA. Kosak Decl. ¶ 9 & Attach. 3 (Letter from D. Weslow dated Feb. 21, 2020). The notice was sent to the registrants care of the registrars for the Defendant domain names. *Id.* ¶ 9. Thus, all that remains to complete service of process is the published notice as *may* be directed by the Court.

Section 2(A)(ii)(II)(bb) of the ACPA requires an *in rem* plaintiff to provide notice of the *in rem* proceeding by “publishing notice of the action as the court may direct promptly after filing the action.” This Court has, despite the discretionary language of the statute, required publication in *in rem* actions. *See Facton Ltd. v. Gstaronsale.com*, No. 1:10-cv-1165-AJT-JFA, 2011 WL 677107, at \*3 (E.D. Va. Feb. 17, 2011) (discussing the Court's conflicting interpretations of Section (bb) and concluding that publication is consistent with the principles underlying *in rem* jurisdiction). Therefore, Plaintiff requests that the Court issue an order indicating that notice shall be given by publication in either *The Washington Post* or *The Washington Times* as set forth in the proposed Order submitted herewith. *See, e.g., Jewels Connection, Inc. v. OroClub.com*, 1:20-cv-364 (TSE/MSN) [Doc. 9] (E.D. Va. Apr. 14, 2020); *Stacy Plays Brands, LLC v. StacyPlays.com*, 1:20-cv-172 (LMB/TCB) [Doc. 7] (E.D. Va. Feb.

28, 2020); *K.F. Davis Engineering, Inc. v. KFDE.com*, 1:19-cv-1209 (AJT/MSN) [Doc. 6] (E.D. Va. Oct. 1, 2019); *Addicting Games, Inc. v. Addicting.com*, 1:19-cv-56 (CMH/IDD) [Doc. 9] (E.D. Va. Apr. 22, 2019); *Code-to-Learn Foundation d/b/a Scratch Foundation v. Scratch.org*, No. 1:19-cv-67 (LO/MSN) [Doc. 8] (E.D. Va. Feb. 8, 2019); *Blackshore Props., Inc. v. Eqn.com*, No. 1:18-cv-1325 (LMB/JFA) [Doc. 8] (E.D. Va. Nov. 8, 2018); *Thirsty Boy Inc. v. Thumb.com*, No. 1:17-cv-01039 (CMH/TCB) [Doc. 7] (E.D. Va. September 27, 2017); *Intercontinental Data Comms., Ltd. v. Doe*, No. 1:16-cv-613 (LMB/JFA) [Doc. 10] (E.D. Va. June 6, 2016); *Central Source LLC v. annucreditreport.com*, No. 1:14-cv-302 (AJT/JFA) [Doc. 8] (E.D. Va. Apr. 21, 2014); *Central Source LLC v. annualdcreditreport.com*, No. 1:14-cv-304 (LO/JFA) [Doc. 7] (E.D. Va. Apr. 21, 2014); *Citigroup Inc. v. citibankthankyourewards.com*, No. 1:14-CV-0855 (AJT/TRJ), 2015 WL 222161, at \*2 (E.D. Va. Jan. 14, 2015) (finding that single publication was sufficient to satisfy Section 2(A)(ii)(II)); *Rosa Mexicano Brands, Inc. v. rosamexicanopuntademita.com*, No. 1:14-CV-00003, 2014 WL 4181068, at \*3 (E.D. Va. Aug. 20, 2014) (same); *Citigroup Inc. v. Citycard.com*, No. 1:12-CV-1389 GBL/JFA, 2013 WL 3759780, at \*1 (E.D. Va. July 12, 2013) (same); *RMV Enterprises, LLC v. KSoftware.com*, No. 1:12-cv-0335, 2012 WL 4739524, at \*1 (E.D. Va. Aug. 24, 2012) (finding that under Section 43(d)(2) of the Lanham Act, 15 U.S.C. § 1125(d)(2), “service is accomplished by publishing notice of the action and sending notice of the action to the registrant”).

**B. The Court Should Grant Leave to Concurrently Serve Process on John Doe by Email and Publication Under the Remaining Causes of Action.**

Plaintiff also requests that the Court grant leave to concurrently serve process by email and publication for Plaintiff’s Computer Fraud and Abuse Act, Electronic Communications Privacy Act, quiet title, and conversion claims. Due to John Doe’s surreptitious efforts to steal the Defendant domain names without detection and their registrant(s)’ efforts to conceal their

identities, Plaintiff has no information regarding who John Doe is, or whether he is located within the United States or abroad. Kosak Dec. ¶ 6. Under such circumstances, this District has applied Federal Rule of Civil Procedure 4(f), governing service on an individual in a foreign country. *See, e.g., Lunxi v. Doe*, 1:19-cv-1027 (AJT/TCB) [Doc. 19 at \*7] (E.D. Va. Mar. 27, 2020), *R. & R. adopted*, [Doc. 29] (E.D. Va. Apr. 27, 2020).

Rule 4(f)(3) allows service on individuals in a foreign country “by other means not prohibited by international agreement, as the court orders.” Service under Rule 4(f)(3) is “neither a last resort nor extraordinary relief . . . [but] merely one means among several which enables service of process on an international defendant.” *Advanced Aerofoil Technologies, AG v. Todaro*, 2012 WL 299959, at \*1 (S.D.N.Y. Jan. 31, 2012). Service under Rule 4(f)(3) need only comply with constitutional due process. “In order to fulfill due process requirements under Rule 4(f)(3), the Court must approve a method of service that is reasonably calculated to give notice to defendant.” *BP Products N. Am., Inc. v. Dagra*, 232 F.R.D. 263, 264 (E.D. Va. 2005) (internal quotation marks omitted).

This Court has approved service of process by email, finding that it comports with due process. *WhosHere, Inc. v. Orun*, No. 1:13-cv-00526-AJT-TRJ, 2014 WL 670817, at \*3 (E.D. Va. Feb. 20, 2014). Moreover, this Court has approved concurrent service upon foreign defendants by email and publication for numerous other domain name theft cases including related claims for violation of the Computer Fraud and Abuse Act. *See Jewels Connection, Inc. v. Oroclub.com*, 1:20-cv-364 (TSE/MSN) [Doc. 9] (E.D. Va. Apr. 14, 2020); *K.F. Davis Engineering, Inc. v. KFDE.com*, 1:19-cv-1209 (AJT/MSN) [Doc. 6] (E.D. Va. Oct. 1, 2019); *Almeida v. TabelaFipeBrasil.com*, 1:19-cv-1105 (CMH/TCB), (Doc. 19) (E.D. Va. Sept. 19, 2019); *Diginus BV v. 1001.com*, 1:19-cv-1089 (LO/JFA) (Doc. 6) (E.D. Va. Aug. 28, 2019);

*Blackshore Props., Inc. v. Eqn.com*, No. 1:18-cv-1325 (LMB/JFA) [Doc. 8] (E.D. Va. Nov. 8, 2018); *Thirsty Boy Inc. v. Thumb.com*, No. 1:17-cv-01039 (CMH/TCB) [Doc. 7] (E.D. Va. September 27, 2017); *GMF, Inc. v. Doe*, No. 1:17-cv-00034 (LO/IDD) [Doc. 13] (E.D. Va. Feb. 2, 2017); *Keefe, Jr. v. Doe*, No. 1:17-cv-00056 (LO/JFA) [Doc. 6] (E.D. Va. Jan. 25, 2017); *Muscle Mass, Inc. v. Doe*, No. 1:17-cv-00033 (LO/TCB) [Doc. 9] (E.D. Va. Jan. 24, 2017); *Intercontinental Data Communications Ltd.*, No. 1:16-cv-613 (LMB/JFA) [Doc. 10] (E.D. Va. June 6, 2016); *Consumer Source Holding, Inc. v. Does 1-24*, No. 1:13-cv-1512-AJT-JFA [Doc. 21] (E.D. Va. Dec. 23, 2013); *Watson v. Doe*, No. 1:15-cv-831 (AJT/MSN) [Doc. 9] (E.D. Va. Aug. 28, 2015); *Acme Billing Co. v. Doe*, No. 1:14-cv-1379 (LO/MSN) [Doc. 8] (E.D. Va. Nov. 10, 2014).

In a case involving similar facts to the present case, service by email and publication was allowed because:

(1) Defendants have provided false names and physical address information in their Domain Name in order to conceal their location and avoid liability for their unlawful conduct, (2) Defendants rely primarily on electronic communications to communicate with their registrars and customers, demonstrating that electronic service would be a reliable means of apprising the Defendants of this case, and (3) Plaintiffs were unable to determine the exact physical whereabouts or identities of the registrants of the Domain Name being used[.]

*Tory Burch LLC v. Partnerships & Unincorporated Associations Identified on Schedule A*, No. 13-cv-2059, 2013 WL 1283824, at \*9 (N.D. Ill. Mar. 27, 2013). Here, Defendants have taken great pains to conceal all information about themselves, and appear to have conducted the theft and re-registration of the Defendant domain names entirely through electronic means, including through online interactions with the various domain registrars. See Compl. ¶¶ 4-20, 47-49; Kosak Decl. ¶¶ 4-7. Accordingly, electronic service through the same means that the

registrant(s) provided to those domain registrars in registering the stolen domains is a “reliable means of apprising the Defendants of this case.” *Tory Burch*, 2013 WL 1283824, at \*9.

Given John Doe’s apparent efforts to avoid identification and liability, and the use of the email addresses and online portals listed in the accompanying proposed order, concurrent service of Plaintiff’s claims through email and publication is in the public interest. *See U.S. v. Lebanese Canadian Bank SAL*, No. 11-cv-9186, 2012 WL 2035997, at \*4 (S.D.N.Y. Jun. 6, 2012). Service of process by email and publication therefore comports with due process and should be allowed.

Alternatively, Plaintiff submits that service by publication is proper under Federal Rule of Civil Procedure 4(e), which permits service on an individual within the United States so long as that service “follow[s] state law for serving summons in an action brought in courts of general jurisdiction in the state where the district court is located.” Virginia Code Section 8.01-316, in turn, permits service by publication in various scenarios, at least two of which are relevant here.

First, Section 8.01-316(a)(1)(a) provides for service by publication on a party who is “a nonresident individual.” Although all identifying information has been concealed, it appears highly likely that John Doe is located outside the Commonwealth of Virginia. *See Kosak Decl.* ¶ 6.

Second, Section 8.01-316(A)(2) allows for publication where a pleading states that there are or may be unknown persons interested in the subject to be disposed of, describes the nature of such interest; and identifies such persons as parties unknown. The Complaint here seeks disposition of property—namely, the return of the Defendant domain names. Compl. Prayer for Relief ¶ 3. The Complaint also identifies John Doe—a party unknown—as the person who took control of the Defendant domain names without authorization. *Id.* ¶¶ 2, 20. Finally, the

Complaint describes the nature of John Doe’s interest in the property, alleging that “[t]hrough control of the domain names, John Doe has asserted a claim to the Defendant Domain Names . . . .” *Id.* ¶ 69. The requirements of Section 8.01-316(A)(2) are therefore satisfied, and service by publication is proper.

Plaintiff also requests email service. Pursuant to Virginia Code Section 8.01-317 regarding publication,

[t]he court may, in any case where deemed proper, dispense with such publication in a newspaper or may order that appropriate notice be given by electronic means, under such terms and conditions as the court may direct, either in addition to or in lieu of publication in a newspaper, provided that such electronic notice is reasonably calculated, under all circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.

Plaintiff’s additional request for email service is intended to increase the chances that John Doe will actually receive notice of this action, and thus complying with Section 8.01-317 and ensuring that service comports with due process. *See, e.g., Montblanc-Simplo GmbH v. Ilnitskiy*, 1:17-cv-415-LMB-TCB [Doc. 30] (E.D. Va. Sept. 27, 2017) (permitting service by email); *Am. Chem. Soc’y v. Does 1-99*, 1:17-cv-726-LMB-JFA [Doc. 8] (E.D. Va. July 17, 2017) (same); *411 Mania.com, LLC v. 411mania.com*, 1:17-cv-469-LMB-IDD [Doc. 10] (E.D. Va. May 5, 2017) (same); *MGM Resorts Int’l v. Unknown Registrant of www.imgcasicom*, 2:14-CV-01613-GMN, 2015 WL 669026 (D. Nev. Feb. 17, 2015) (authorizing service by email against unknown registrant of allegedly infringing domain name); *Abercrombie & Fitch Trading Co. v. 7starzone.com*, 14-cv-60087, 2014 WL 11721486 (S.D. Fla. Mar. 11, 2014) (authorizing service by email against defendants who “operated anonymously via the Internet”); *Microsoft Corp. v. Does*, 12-cv-1335-SJ-RLM, 2012 WL 5497946 (E.D.N.Y. Nov. 13, 2012) (finding service by email appropriate against Doe defendants accused of Internet-based intellectual property

infringement); *Gucci Am., Inc. v. Wang Huoqing*, 09-cv-05969-JCS, 2011 WL 31191, at \*2 (N.D. Cal. Jan. 3, 2011) (service by email permitted in action for trademark counterfeiting and infringement and false designation of origin), *R. & R. adopted sub nom. Gucci Am. v. Wang Huoqing*, 09-cv-05969-CRB, 2011 WL 30972 (N.D. Cal. Jan. 5, 2011); *Chanel Inc. v. Zhibing*, 2:09-cv-02835-CGC, 2010 WL 1009981 (W.D. Tenn. Mar. 17, 2010) (finding service to email addresses listed on defendant’s websites and WHOIS records most likely method of reaching defendant).

**C. Under 28 U.S.C. § 1655, the Court Should Direct Defendants to Plead by October 30, 2020.**

Section 1655, known as the “federal *in rem* statute” or the “lien enforcement statute,” provides a means to “remove any cloud upon the title to, real or personal property within the district” where the defendant either cannot be served in the state or does not voluntarily appear.

28 U.S.C. § 1655. According to the statute:

[T]he court may order the absent defendant to appear or plead by a day certain.

Such order shall be served on the absent defendant personally if practicable, wherever found, and also upon the person or persons in possession or charge of such property, if any. Where personal service is not practicable, the order shall be published as the court may direct, not less than once a week for six consecutive weeks.

If an absent defendant does not appear or plead within the time allowed, the court may proceed as if the absent defendant had been served with process within the State, but any adjudication shall, as regards the absent defendant without appearance, affect only the property which is the subject of the action. When a part of the property is within another district, but within the same state, such action may be brought in either district.

*Id.* Here, as discussed above, the current registrant(s) of the Defendant domain names have entirely concealed their identity, such that identification of Defendants—let alone personal service—is not practicable. Compl. ¶¶ 4-19; Kosak Decl. ¶¶4-6. Service by publication and e-mail is the most reliable method of service. Plaintiff seeks an Order from this Court under

Section 1655 requiring Defendants to plead by a date certain and requiring Plaintiff to serve a copy upon Verisign, Inc. which, as the operator of the .com domain name registry, is “the person or persons in possession or charge of such property.” See Compl. ¶ 29; *Almeida v. TabelaFipeBrasil.com*, 1:19-cv-1105 (CMH/TCB) [Doc. 19] (E.D. Va. Sep. 19, 2019) (granting order to plead by date certain in action under Section 1655 for recovery of stolen domain name); *Diginus BV v. 1001.com*, 1:19-cv-1089 (LO/JFA) [Doc. 6] (E.D. Va. Aug. 28, 2019) (same); *Internet Channel Corp. v. INCH.com*, No. 1:19-cv-177 (AJT/MSN) [Doc. 8] (E.D. Va. March 4, 2019) (same). Plaintiff proposes October 30, 2020 as the date certain, as it is eight weeks from the filing date of the motion, which will allow adequate time for the six-week publication schedule as well as time for Defendants to respond.

### III. CONCLUSION

For the reasons set forth above, Plaintiff requests that this motion be granted, that the Court enter the proposed Order submitted herewith, and that the Court grant such further relief as this Court deems proper.

Dated: September 9, 2020    By:           /s/ Adrienne J. Kosak /s/            
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**CERTIFICATE OF SERVICE**

I, Adrienne J. Kosak, hereby certify that on September 9, 2020, I electronically filed the foregoing by using the CM/ECF system. I also sent a copy to the registrant(s) of the Defendant domain names at the email addresses provided by the registrant to the domain registrars:

Gocars.com@anonymize.com  
4188182@privacy-link.com  
Gofashion.com@anonymize.com  
Gogames.com@anonymize.com  
4268489@privacy-link.com  
Goparty.com@anonymize.com  
Gorestaurants.com@anonymize.com  
Goservice.com@anonymize.com  
4049585@privacy-link.com  
Goweather.com@anonymize.com  
Contact@privacyprotect.org

I also informed the registrants of the filings through portals provided as the only means of communication:

<https://whoispro.domain-robot.org/whois/gogifts.com>  
<https://www.godaddy.com/whois/results.aspx?domain=gosafety.com>  
<https://www.godaddy.com/whois/results.aspx?domain=mx4.com>

Finally, where neither email address nor portal was available, I sent a copy to the registrant(s) care of the registrars at the following email addresses:

abuse@godaddy.com  
abuse@domainpeople.com

*/s/ Adrienne J. Kosak /s/*

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