

**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.

[PROPOSED] ORDER TO PUBLISH NOTICE OF ACTION

Upon consideration of Plaintiff's Motion for an Order to Publish Notice of Action and Plaintiff's Memorandum of Law and Declaration in support thereof, IT IS HEREBY ORDERED:

1. That a copy of this Order be published in either *The Washington Post* or *The Washington Times* once per week for six consecutive weeks, commencing within fourteen (14) days after entry of this Order.

2. That Plaintiff shall serve a copy of this Order on: (i) Defendant John Doe and the Defendant domain names via the following methods:

- GOCARS.COM: Email to Gocars.com@anonymize.com
- GOELECTRIC.COM: Email to 4188182@privacy-link.com
- GOFASHION.COM: Email to Gofashion.com@anonymize.com
- GOGAMES.COM: Email to Gogames.com@anonymize.com
- GONUCLEAR.COM: Email to 4268489@privacy-link.com
- GOPARTS.COM: Email to abuse@godaddy.com
- GOPARTY.COM: Email to Goparty.com@anonymize.com
- GORESTaurants.COM: Email to Gorestaurants.com@anonymize.com
- GOSALES.COM: Email to abuse@domainpeople.com
- GOSERVICE.COM: Email to Goservice.com@anonymize.com
- GOTOUR.COM: Email to 4049585@privacy-link.com
- GOWEATHER.COM: Email to Goweather.com@anonymize.com
- GODOCTOR.COM: Email to Contact@privacyprotect.org
- GOGIFTS.COM: Through electronic portal at <https://whoispro.domain-robot.org/whois/gogifts.com>
- GOSAFETY.COM: Through electronic portal at <https://www.godaddy.com/whois/results.aspx?domain=gosafety.com>
- MX4.COM: Through electronic portal at <https://www.godaddy.com/whois/results.aspx?domain=mx4.com>

and (ii) VeriSign, Inc., as the person or persons in possession of the Defendant domain names.

3. That a declaration be filed on Plaintiff's behalf, no later than seven (7) days after the completion of the above-stated provisions of this Order, describing the steps that have been taken to comply with this Order.

4. That Defendants John Doe and the Defendant domain names are hereby advised:

A. Plaintiff has filed a Verified Complaint charging the Defendant domain names with violation of the Anticybersquatting Consumer Protection Act and John Doe with violating the Copyright Act, Computer Fraud and Abuse Act, the Electronic Communications Privacy Act, and related claims arising from the unauthorized access to Plaintiff's secured computer account and the unauthorized transfer of the Defendant domain names (the "Counts").

A copy of the Verified Complaint may be obtained from Plaintiff's counsel, David E. Weslow, Wiley Rein LLP, 1776 K Street NW, Washington, DC 20006, telephone (202)719-7000.

B. In the event Plaintiff prevails under the Counts, remedies could include the forfeiture or cancellation of the Defendant domain names, the transfer of the Defendant domain names to Plaintiff in this action, monetary damages, and/or attorney's fees.

C. Any answer or other response to the Verified Complaint should be filed with the Clerk of Court, United States District Court for the Eastern District of Virginia, Alexandria Division, 401 Courthouse Square, Alexandria, Virginia 22314-5798 by October 30, 2020. If no appearance or pleading is filed as required by this Order, this Court may render a judgment against John Doe and/or the Defendant domain names, which could include the forfeiture or cancellation of the Defendant domain names or the transfer of the Defendant domain names to the Plaintiff, monetary damages, and/or attorney's fees.

5. That the foregoing steps shall be deemed to constitute service of the Verified Complaint on, and notice of the pleading due date to, Defendants John Doe and the Defendant domain names pursuant to the Federal Rules of Civil Procedure and 28 U.S.C. § 1655.

Entered this ____ day of _____, 2020.
