

COMPLAINT TRANSMITTAL COVERSHEET

Attached is a Complaint that has been filed against you with the World Intellectual Property Organization (**WIPO**) Arbitration and Mediation Center (the **Center**) pursuant to the Uniform Domain Name Dispute Resolution Policy (the **Policy**) approved by the Internet Corporation for Assigned Names and Numbers (**ICANN**) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**) approved by ICANN on October 30, 2009, and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

The Policy is incorporated by reference into your Registration Agreement with the Registrar(s) of your domain name(s), in accordance with which you are required to submit to a mandatory administrative proceeding in the event that a third party (a **Complainant**) submits a complaint to a dispute resolution service provider, such as the Center, concerning a domain name that you have registered. You will find the name and contact details of the Complainant, as well as the domain name(s) that is/are the subject of the Complaint in the document that accompanies this Coversheet.

You have no duty to submit a Response to the Complaint until you have been formally Notified of the Complaint and Commencement of Administrative Proceedings by the Center. Once the Center has checked the Complaint to determine that it satisfies the formal requirements of the Policy, the Rules and the Supplemental Rules, it will forward an official copy of the Complaint, including annexes, to you by e-mail as well as sending you hardcopy Written Notice by post and/or facsimile, as the case may be. You will then have 20 calendar days from the date of Commencement within which to submit a Response to the Complaint in accordance with the Rules and Supplemental Rules to the Center and the Complainant. You may represent yourself or seek the assistance of legal counsel to represent you in the administrative proceeding.

- The **Policy** can be found at <http://www.icann.org/en/dndr/udrp/policy.htm>
- The **Rules** can be found at <http://www.icann.org/en/dndr/udrp/uniform-rules.htm>
- The **Supplemental Rules**, as well as other information concerning the resolution of domain name disputes can be found at <http://www.wipo.int/amc/en/domains/supplemental/eudrp/>

- A **model Response** can be found at
<http://www.wipo.int/amc/en/domains/respondent/index.html>

Alternatively, you may contact the Center to obtain any of the above documents. The Center can be contacted in Geneva, Switzerland by telephone at +41 22 338 8247, by fax at +41 22 740 3700 or by e-mail at domain.disputes@wipo.int.

You are kindly requested to contact the Center to provide an alternate e-mail address to which you would like (a) the Complaint, including Annexes and (b) other communications in the administrative proceeding to be sent.

A copy of this Complaint has also been sent to the Registrar(s) with which the domain name(s) that is/are the subject of the Complaint is/are registered.

By submitting this Complaint to the Center the Complainant hereby agrees to abide and be bound by the provisions of the Policy, Rules and Supplemental Rules.

Before the:

**WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

*G.W.H.C. – SERVIÇOS ONLINE
LTDA.*

AND

E-COMMERCE MEDIA GROUP
INFORMACAO E TECNOLOGIA
LTDA.

AV. PAULISTA 287, 16° ANDAR –
SÃO PAULO/SP - BRAZIL
01311-000

-v-

EREALSTATE.COM, BOX 810276,
DOMAIN LEASING DIVISION – BOCA
RATON/FL - USA

Disputed Domain Name(s):

www.saveme.com

COMPLAINT

I. Introduction

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy (the **Policy**), approved by the Internet Corporation for Assigned Names and Numbers (**ICANN**) on October 24, 1999, the Rules for Uniform Domain Name Dispute Resolution Policy (the **Rules**), approved by ICANN on October 30, 2009, and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the **Supplemental Rules**).

II. The Parties

A. The Complainants

[2.] The Complainants in this administrative proceeding are G.W.H.C. – Serviços Online Ltda. and E-Commerce Media Group Informação e Tecnologia Ltda.

[3.] The Complainants' contact details are:

Address: Av. Paulista 287, 16º Andar – São Paulo/SP – Brasil

Telephone: +55 (11) 3848-8700

Fax: +55 (11) 3848-8700

E-mail: rcruz@buscapecompany.com

[4.] The Complainants' authorized representative in this administrative proceeding is:

Marcio Mello Chaves (Annex III)

[5.] The Complainants' preferred method of communications directed to the Complainants' in this administrative proceeding is:

Electronic-only material

Method: e-mail

Address: mmchaves@almeidalaw.com.br

Contact: Marcio Mello Chaves

Address: Av. Brigadeiro Faria Lima, 16° Andar Torre Sul
São Paulo/SP - Brasil
Telephone: +55 (11) 2714-6900
Fax: +55 (11) 2714-6901

B. The Respondent

[6.] According to registrar DirectNIC database, the Respondent in this administrative proceeding is eRealState.com. Copies of the printout of the database search conducted on February 28, 2012 are provided as Annex I.

[7.] All information known to the Complainant regarding how to contact the Respondent is as follows:

eRealEstate.com
Address: Box 810276
Domain Leasing Division
Telephone: +1 (561) 206-2201
Fax: +1 (561) 206-2201
E-mail: Mr800king@aol.com

Administrative Contact: **Schwartz, Rick**
Address: Box 810276 Boca Raton, FL 33481
Domain Leasing Division
Telephone: +1 (561) 206-2201
Fax: +1 (561) 206-2201
E-mail: domainking@gmail.com

III. The Domain Name(s) and Registrar(s)

[8.] This dispute concerns the domain name(s) identified below:

www.saveme.com, registered in 08.22.1996

[9.] The registrar with which the domain name is registered is:

DirectNIC

Address: DNC Holdings, Inc.
3500 N. Causeway Blvd.
Suite 160
Metairie, LA 70002

Telephone: +1 (877) 856-9598

Fax: +1 (888) 564-7373

E-mail: legal@directnic.com

V. Jurisdictional Basis for the Administrative Proceeding

[10.] This dispute is properly within the scope of the Policy and the Administrative Panel has jurisdiction to decide the dispute. The registration agreement, pursuant to which the domain name that is the subject of this Complaint is registered, incorporates the Policy. A true and correct copy of the domain name dispute policy that applies to the domain name in question is provided as Annex II to this Complaint.

VI. FACTS AND LEGAL GROUNDS

[11.] As it will be incontestable after the analysis of this proceeding, the Complainants have legitimate rights to have the domain subject to this arbitration either transferred or canceled because:

- (i) The domain name www.saveme.com is identical to the Complainants' trademark application "SAVEME" and a nearly identical typographic error to its popular portals saveme.com.br, www.saveme.ar, www.saveme.co, www.saveme.pe, www.saveme.cl, www.saveme.mx and www.saveme.ve;
- (ii) The domain has been used for many years as a parking page and never for actually hosting a website, showing that the Respondent has no rights or even legitimate interests in relation to the domain's name other to benefit from pay-per-click income generated from mislead Complainants' customers;
- (iii) After Complainants' SAVEME Portal success, the domain, has been used to direct internet users to a pornographic content website causing undeniable damages to Complainants' image before its customers and to a self-promoting

website for the Respondent, all of which to benefit at the cost of diverted SAVEME customers, to speculate the aftermarket value of the domain due to the SAVEME success and to pass as the Complainant itself displaying similar content, showing the clear bad faith use;

- (iv) Complainants' sole interest in this Complain is to avoid the confusion generated from having its customers mislead to Respondent's websites, damaging the brand's identity and bringing illegal profit to the Respondent, reason why asks the domain be either transferred or cancelled.

[12.] Those previously identified requirements displayed on item 4a(i), 4a(ii) and 4a(iii) of the ICANN Uniform Domain Name Dispute Resolution Policy are further explained in depth on the following terms, introduced by a brief background on the facts of this case.

VI.I.I. COMPLAINANTS COMPANIES ACTIVITIES

[13.] SAVEME is one of the Complainants' (commonly known in Brazil for its most famous services "Buscapé") many services that gathers in just one place advertisements from daily deals (also known as group or collective buying services) such as Groupon, Peixe Urbano, ClickOn, *et cetera*, from various countries it acts. As the name itself suggests, the website aim is to allow its users to save money, efficiency and time, conducting searches and displays daily offers from several collective buying services at once.

[14.] Acting in several Latin American countries such as Argentina, Peru, Colombia, Venezuela and Mexico, SAVEME has already wide prestige among Brazilian users where it has over 150,000 accesses monthly. The large acceptance is no different than other Buscapé Company's websites: it is one of the biggest e-commerce corporations in Latin America and is present in more than 20 countries worldwide, including USA, Spain, Argentina and Mexico, receiving over 20,000,000 visits every month.

[15.] Since its release in October of 2010, SAVEME has been gaining a growing number of users, motivated by the pioneering and the exclusivity of the offered services, as well as by the spread of daily offers services. SAVEME is already the 103rd most popular by website amongst Brazilian internet users (Annex IV).

[16.] In addition to the ownership of the domain in the ".br" ccTLD, the Complainant has also several domains of the same SLD name in other ccTLD: www.saveme.ar, www.saveme.co, www.saveme.pe, www.saveme.cl, www.saveme.mx and

www.saveme.ve (Annex III). The registration of these domains shows the reach of the Complainant's services, which are present in several Latin American countries.

[17.] Besides the abovementioned domain names, the Complainants have also applied for the "SAVEME" trademark registration on classes 35, 38 and 42 of the Nice Agreement (Annex VI). Since the application, trademark laws worldwide, such as Brazilian Law 9279/96¹, give owners the right to protect a trademark's reputation.

[18.] Despite not being granted due to Brazil Trademark Office's enormous backlog in analyzing trademark applications, Complainants' mark's notoriety reaches not only Brazil but also several Latin American countries and evidences its use throughout Latin America.

[19.] This Arbitration Center has decided in several cases that the lack of registration is not an obstacle to granting the transfer of domains. As it has been previously decided on case D2004-0322²:

*Complainant has not registered the name THE IDEA LEAGUE as a trademark, therefore the questions arise as to (i) **whether the Policy applies to unregistered trademarks** and (ii) whether the mark at issue has acquired sufficient distinctiveness through use and promotion to identify the source of this particular service with Complainant.*

*With regard to the first question, it is undisputed and accepted practice, that paragraph 4(a)(i) of the Policy refers merely to a "trademark or service mark" in which the complainant has rights, and does not expressly limit the application of the Policy to a registered trademark or service mark. Further, the WIPO Final Report on the Internet Domain Name Process (The Management of Internet Names and Address: Intellectual Property Issues, April 1999), from which the Policy is derived, **does not distinguish between registered and unregistered trademarks and service marks in the context of abusive registration of domain names. It is therefore open to conclude that the Policy is applicable to unregistered trademarks and service marks.***

1 Article 130. To the trademark owner or to the depositor is also guaranteed the right to:
(...)
III – ensure its material integrity or reputation.

2 Imperial College v. Christophe Dessimoz.

Therefore, in the Panel's view, the fact that in this case Complainant has no registered trademark or service mark for THE IDEA LEAGUE does not preclude a finding that it has established trademark or service mark rights in that name for the purpose of the Rules. Indeed, a fundamental principle of trademark law is that rights in a trademark can be acquired through use, and such rights exist even though the trademark may not be registered.

*With regard to the second question (whether Complainant has common law trademark rights in the name THE IDEA LEAGUE), the Panel notices that common law trademark and service mark rights exist when a party proves that **there is enough goodwill and reputation in and to a name and sufficient association of the same with the party itself**, no matter how strong or weak those trademark and service mark rights may be.*

[20.] Complainants' multinational notoriety and actions taken towards protecting its trademark assure its rights as widely recognized and accepted by this Center. The objective to this proceeding is no other than to protect the companies' most important assets: (i) their domain, to avoid misled customers to other websites; and (ii) their brand's reputation from the abusive misdirection of Complainants' customers to pornographic content websites and useless pay-per-click parking pages. Both activities have been and are being conducted by the Respondent as we will see in further details.

VI.I.II. RESPONDENT'S ACTIVITIES

[21.] According to its own website (Annex VII) eRealState.com has more than 6,000 Internet domains and as main activity the purchase and the "electronic real estate development" of their domains. The eRealState company is one of the enterprises owned by Ricky Schwartz, well known in the Internet speculation business.

[22.] Respondent uses many of its domains, including the one subject to this arbitration, for pay-per-click domain parking (Annex VIII), widely known type of profiting used by internet domain speculators to monetize from diverted consumers and to sell domain addresses for exorbitant prices to legit trademark and business owners struggling to recover their brands identities online.

[23.] Respondent's owner has already been ruled against by this Center due to his activities with domain containing trademark names leading to pornographic material. His repressive conduct was subject to several arbitrations, especially with the famous

“sucks” cases. This reprehensive conduct was also strongly stressed on Case No. D2001-0213 where it was stated:

*Mr Schwartz has received publicity as a result of the large number of domain names that he has acquired and sold. **According to an article in The Business Journal, more than half of the domain names owned by Mr. Schwartz are "dirty".** They include such generic names as <dick.com>, <orgy.com>, <porno.com>, <ass.com> and <horny.com>. Mr. Schwartz has also a group of domain names incorporating famous trademarks with the word "SUCKS" appended to them. These include, for example, <cbs-sucks.com>, <bellatlantic-sucks.com>, <gm-sucks.com>, <mci-sucks.com>, <motel6sucks.com> and <nbcsportsucks.com>. (...) Clicking through to these sites, the viewer sees very explicit pornographic pictures (...) **The Panel has no difficulty in finding bad faith registration and use. Respondent has shown a cynical pattern of dealing in domain names with apparent attempt to embarrass the owners of internationally known marks.** The fact that Internet users are diverted to the Respondent's sites is evidence of bad faith. That would be so even if the sites were non-pornographic.*

[24.] As we will see bellow, Respondent's background lucrative activities as domainer, widely recognized as inappropriate as mentioned above, have caused and have been causing serious damages to Complainants' business and their customers who are mislead to websites other than the one they are really looking for.

VI.I.III. CONFUSION CREATED BY THE DISPUTED DOMAIN, RESULTANT RESPONDENT'S PROFITS AND DAMAGES CAUSED TO THE COMPLAINANTS

[25.] Along with the widely known fame the Respondent has in the Domain Name business, this case surely shows his real intentions towards the domain names he registered. The use given to the saveme.com domain, although registered in 1996, has been made mainly as a pay-per-click parking page, and the failure to use it for another purpose for 15 years shows clearly the lack of interest in the exploration of the name "SAVEME" by the Respondent.

[26.] It is undeniable that the confusion caused by Respondent's domain to Complainants customers, since the disputed domain is a simple typographic error to Complainant's websites. As we can see in the statistics presented on Annex IX, 100% of the saveme.com visitors go to the Complainant's real website after realizing the confusion made.

[27.] Of course the Respondent is quite satisfied with the confusion created. After all, the proposes of the disputed domain are (i) to generate profit from mislead consumers through pay-per-click ads and (ii) to profit from the domain sale for an enormous amount after knowing of the Complainant's success

[28.] At last, due to the Complainants' known success, the other uses given by the Respondent affected negatively and directly Complainants activities. Mislead SAVEME customers browsing for its daily offers search services ended up being directed to a pornographic website, causing undeniable damages to the company's image with the bad-publicity generated through social media networks such as Twitter (Annex V).

A. CUSTOMER (INTERNET USERS) CONFUSION BETWEEN DOMAIN NAMES

[29.] The confusion between the domains owned by the Complainant and the domain subject to this procedure is obvious since they have the same SLD (Second-Level Domain) name, differentiated only by the ccTLD (Country-Level Domain). The internet user mislead in this usual case of mistype is even more evident as we analyze the origin of the Respondent domain's visits.

[30.] Just two weeks after a series of marketing initiatives promoted by the Complainant in Latin America, it was possible to see a considerable leap in saveme.com's ranking position at the Alexa.com statistics. According to statistics site Alexa.com, from the time the SAVEME services started (Annex IX) almost 43% of visits originated from Brazil, where the Complainant's domain has immense prestige amongst internet users due to its highly known services and a market completely strange to the Respondent. Currently, that number has almost doubled, reaching 81.4% of Brazilian visitors who have absolutely no knowledge of the Respondent or his business whatsoever.

[31.] The domain that once was not among the millionth most visited sites in the world currently holds the position 539,969 of the global ranking. In Brazil, the increase is even higher, jumping from 40,905 to 13,905, clearly demonstrating the benefit achieved by the Respondent from the actions promoted by the Complainant.

[32.] Moreover and as previously mentioned and seen on Annex IX, all accesses (downstream) to the disputed domain (100%) go to SAVEME's real website after realizing the mistake. The confusion is between the Respondent's domain and the Complainants' brand and other domains are, therefore, undeniable.

B. ABSENCE OF RIGHTS AND LEGITIMATE INTERESTS BY THE RESPONDENT

[33.] It is clear that the Respondent does not have any right or legitimate interest in relation to the domain name subject of this arbitration since no products or services nearly related to SAVEME are being or have been offered by the Respondent except with the clear bad faith use given further explained on item C of this Complaint.

[34.] As in other transactions of this kind made by the Respondent's companies, the said domain has been maintained in order to benefit from mislead internet users, enhance its value and sell it for a higher price, exploring legitimate internet companies operating in good faith on the effective promotion and supply of goods and services, in a despicable practice which clearly undermines the development of the internet.

[35.] The lack of legitimate interest in the name of the domain becomes even more evident when we analyze the changing content related to it. Respondent's change of content varied from (i) parking pages, (ii) pornographic website; (iii) a self promoting webpage and finally a (iv) pay-per-click parking page with links to daily offer services passing of as the Complainants', confirms the lack of use of the domain or the "saveme" name.

[36.] This Center has ruled on similar cases for supposed *bona fide* use (Case No. D2000-0079:

*This panel need not consider whether or not CFR's use of the disputed domain name was "bona fide", because **it suffices to consider the respondent's subsequent use**. The respondent stated that it wished to use the domain name for an adult sex site (Complaint, Annex G). While (as the respondent correctly points out) many adult sex sites are perfectly legal and constitute bona fide offerings of goods or services, **the use of somebody else's trademark as a domain name** (or even as a meta-tag) clearly **does not constitute a "bona fide" offering** of goods or services when the web site owner has no registered or common law rights to the mark, **since the only reason to use the trademark as a domain name or meta-tag is to attract customers who were not looking for an adult sex site, but were instead looking for the products or services associated with the trademark. Such use of a trademark can create customer confusion or dilution of the mark, which is precisely what trademark laws are meant to prevent. And actions that create, or tend to create, violations of the law can hardly be considered to be "bona fide"**.*

[37.] Furthermore, any supposed *bona fide* use is barred by the unfair advantage obtained by the Respondent, as decided on Case No D2009-1390:

By using the domain name that incorporates Complainant's mark Respondent may well be able to generate more search hits for its own website, but this mainly appears to suggest that Respondent is seeking to take unfair advantage of Complainant's goodwill in its mark.

[38.] That been said, it is undeniable the absolute absence of any legitimate interests by the Respondent in the referred domain.

C. BAD FAITH IN THE DOMAIN NAME USE

[39.] Based on the business records of the Respondent, the absence of rights or legitimate interests in the domain saveme.com and certain profits generated and sought by the diversion of SAVEME customers to pornographic, self-promoting websites and pay-per-click parking pages, it is clear that the Respondent has been using the domain in bad faith.

[40.] The purpose of making profit and taking advantage from traffic coming from the Complainant's services is even more explicit: shortly after the release of the "SAVEME" services and extensive marketing activities of the Complainants in Latin America, Respondent updated the content of the domain again to redirect customers to a pornographic website, damaging the Complainants' image with their customers (Annex V).

[41.] Furthermore, Respondent's bad faith is also demonstrated through the offering prices for the domain. As we can see in the emails sent by the Respondent³, after the growing popularity of the SAVEME services the Respondent mentioned a "six figure" price tag as a starting point to negotiate the domain (Annex X), expressly stating that the domain would not be sold, "*not even for US\$ 100K*".

[42.] As mentioned before, Respondent's "*cynical pattern of dealing in domain names with apparent attempt to embarrass the owners of internationally known marks*" is well known in this Arbitration Center (Case No. D2001-0213) and it clearly shows his knowledge of the high profits made through mislead SAVEME customers and the great expectation towards selling the domain to an internationally known company as the Complainants'.

³ [1.] Complainants' attorney's emails exchanged with the Respondent hid Complainants' name in order to avoid (i) the risk of cyber flight, (ii) the increase of the domain price, and (iii) the intentional change of the domain's content by Respondent, in order to mask his real use and intentions.

[43.] Later, and clearly aware of the Complainants' SAVEME services success, the Respondent made a content update to the domain to include a self-promoting website for the "domainer" activity, which was later changed to a regular pay-per-click parking page. Despite being already considered as used in bad faith, the Respondent currently and finally (Annex VIII) changed the domain's content to host a pay-per-click parking page with daily offers advertisements, not only continuing to profit from mislead SAVEME customers looking for the Complainants' webpage but nearly passing off as the Complainants themselves!

[44.] Having users, even for a mere typographical error or confusion, directed to an adult content page causes undeniable material and moral damages to the Complainants' brand, striking directly its reputation. As consequence, users willing to enjoy the website's offers from collective shopping ended up being surprised by pornographic images and videos. Also, the use of pay-per-click parking pages, especially with advertisements to daily offer services clearly indicates the Respondent's knowledge of his bad faith in using the domain.

[45.] Therefore, Respondent's actions in speculating to obtain high values for the SAVEME success and profit through pay-per-clicks parking pages from mislead SAVEME customers are damaging Complainants' business and brand's reputation and demonstrates Respondent's bad faith.

VII. Remedies Requested

[46.] In accordance with Paragraph 4(i) of the Policy, for the reasons described in Section VI above, the Complainant requests the Administrative Panel appointed in this administrative proceeding that saveme.com be either transferred to the Complainant or cancelled to avoid further confusion.

VIII. Administrative Panel

[47.] The Complainant elects to have the dispute decided by a *three-member* Administrative Panel.

[48.] The Complainant appoints the following panelists in order of preference for the *three-member* Administrative Panel mentioned above:

(i) Mr. Rodrigo Azevedo:

Telephone: +55 51 3027 8700

Email: rodrigo.azevedo@silveiro.com.br

(ii) Alvaro Loureiro Oliveira

Telephone: +55 21 553 1811

E-mail: aloureirooliveira@dannemann.com.br

(iii) Luiz Edgard Montauray Pimenta

Telephone: +55 21 2524 0510 / Fax: +55-21 2240 1524

E-mail: luiz@montauray.com.br

IX. Mutual Jurisdiction

[49.] In accordance with Paragraph 3(b)(xiii) of the Rules, the Complainant will submit, with respect to any challenges that may be made by the Respondent to a decision by the Administrative Panel to transfer or cancel the domain name that is the subject of this Complaint, to the jurisdiction of the courts at *the location of the principal office of the concerned registrar*.

XI. Communications

[50.] A copy of this Complaint, together with the cover sheet as prescribed by the Supplemental Rules, has been sent or transmitted to the Respondent on *March 13th, 2012 by email and hard copy on the addresses described on item II of this Complaint*.

[51.] A copy of this Complaint has been sent or transmitted to the concerned registrar on *March 13th, 2012 by email and hard copy on the addresses described on item II of this Complaint*.

[52.] This Complaint is submitted to the Center in *electronic form*, including its 10 Annexes, in the appropriate format.

XII. Payment

[53.] As required by the Rules and Supplemental Rules, payment in the amount of *USD 4,000.00* has been made by *credit card*.

XIII. Certification

[54.] The Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute's resolution shall be solely against the domain name holder and waives all such claims and remedies against (a) the WIPO Arbitration and Mediation Center and Panelists, except in the case of deliberate wrongdoing, (b) the concerned registrar, (c) the registry administrator, (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents.

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

Respectfully submitted,

Marcio Mello Chaves

On behalf of

G.W.H.C. SERVIÇOS ONLINE LTDA.

and

E-COMMERCE MEDIA GROUP INFORMACAO E TECNOLOGIA LTDA.

Date: March 13th, 2012.

XIV. LIST OF ANNEXES

ANNEX I:

SAVEME.COM DIRECTNIC WHOIS

ANNEX II:

UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY

ANNEX III:

COMPLAINANTS POWER OF ATTORNEY

SAVEME DOMAIN NAMES (WHOIS)

SAVEME WEBSITES

ANNEX IV:

ALEXA.COM STATISTICS – SAVEME.COM.BR

ANNEX V:

SAVEME´S CUSTOMERS REACTIONS IN SOCIAL NETWORKS - TWITTER

ANNEX VI :

SAVEME TRADEMARK APPLICATION AT BRAZILIAN TRADEMARK OFFICE – INPI

ANNEX VII:

EREAL ESTATE.COM WEBSITE

ANNEX VIII:

SAVEME.COM WEBSITE

ANNEX IX:

ALEXA.COM STATISTICS – SAVEME.COM ON SAVEME SERVICES LAUNCH

ALEXA.COM STATISTICS – SAVEME.COM

ALEXA.COM STATISTICS – SAVEME.COM TRAFFIC DESTINATION

ANNEX X:

E-MAILS EXCHANGED WITH THE RESPONDENT