

**National Arbitration Forum  
Uniform Rapid Suspension System Complaint**

**HOLA S.L. v. North Sound Names  
FA1407001570171**

Complainant requests that the Complaint be submitted for determination in accordance with the URS Procedure, the URS Rules and the Provider's URS Supplemental Rules.

**Complainant(s) (URS Proc. 1.2.1)**

**Business:** HOLA S.L.  
**Address:** Miguel Angel 1  
Madrid E-28010  
Spain  
**Primary Phone:** +34917814114  
**E-Mail:** dominios@hola.com

**Authorized Complainant Representative(s) (URS Proc. 1.2.2)**

**Respondent(s) (URS Proc. 1.2.3)**

**Name:** Domain Administrator  
**Business:** North Sound Names  
**Address:** 30485 Seven Mile Beach  
Grand Cayman, GC KY11202  
KY  
**Primary Phone:** +1.3457475465  
**E-Mail:** contact@northsoundnames.com

**Authorized Respondent Representative(s)**

**Domain Names, Trademarks, and Use (URS Proc. 1.2.4 and 1.2.5)**

	<u>Domain Name</u>	<u>Trademark</u>	<u>Classification (Goods/Services)</u>
1)	hello.photo	HELLO!	9, 16, 41 (Nice classification)

**Grounds on which Complainant is entitled to relief (URS Proc. 1.2.6)**

1. The registered domain name(s) is/are identical or confusingly similar to a word or mark [URS/.usRS 1.2.6.1]:
  - for which the Complainant holds a valid national or regional registration and that is in current use
2. Registrant has no legitimate right or interest to the domain name [URS/.usRS 1.2.6.2]
3. [if URS] The domain name(s) was/were registered and are being used in bad faith [URS 1.2.6.3] such as:  
[if .usRS] The domain name(s) was/were registered or are being used in bad faith [.usRS 1.2.6.3] such as:
  - Registrant has registered or 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 or service mark or to a competitor of that complainant, for valuable consideration in excess of documented out-of-pocket costs directly related to the domain name

### **Mutual Jurisdiction**

Complainant submits, with respect to any challenges to the determination in this proceeding, to the jurisdiction of the Registrar.

### **Certifications**

**Prior Related Proceedings:**

None Disclosed

**Agreement to Terms:**

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 Provider and Examiner, except in the case of deliberate wrongdoing, (b) the Registrar, (c) the Registry Operator, and (d) [if URS] the Internet Corporation for Assigned Names and Numbers or [if .usRS] the United States Department of Commerce, as well as their directors, officers, employees, and agents.

Complainant certifies that the information contained in this Complaint is to the best of 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 these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument. [URS 3(b)(x).]

Respectfully Submitted,  
HOLA S.L.  
July 17, 2014