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25 Attorneys for Plaintiffs
26 VERIZON CALIFORNIA INC.
27 VERIZON TRADEMARK SERVICES LLC
28 VERIZON LICENSING COMPANY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

VERIZON CALIFORNIA INC.;
VERIZON TRADEMARK SERVICES
LLC; and VERIZON LICENSING
COMPANY,

Plaintiffs,

vs.

NAVIGATION CATALYST SYSTEMS,
INC.; and BASIC FUSION, INC.,

Defendants.

Case No. CV08-02463 ABC (Ex)

**COMPLAINT FOR
CYBERSQUATTING;
TRADEMARK
INFRINGEMENT; FALSE
DESIGNATION OF ORIGIN;
DILUTION; AND UNFAIR
COMPETITION**

DEMAND FOR TRIAL BY JURY

FILED
2008 APR 15 AM 11:57
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANDRA ANNA

1 Plaintiffs, VERIZON CALIFORNIA INC., VERIZON TRADEMARK
2 SERVICES LLC, and VERIZON LICENSING COMPANY (collectively
3 “Plaintiffs”), by and through their attorneys, Christie, Parker & Hale, LLP, file
4 their complaint against NAVIGATION CATALYST SYSTEMS, INC. and
5 BASIC FUSION, INC. (collectively “Defendants”), for injunctive relief and
6 damages as follows:

7 **Subject Matter Jurisdiction and Venue**

8 1. This is an action for cybersquatting under 15 U.S.C. § 1125(d); for
9 trademark infringement under 15 U.S.C. § 1114(1) and California Business &
10 Professions Code § 14320; for false designation of origin under 15 U.S.C. §
11 1125(a); for dilution under 15 U.S.C. § 1125(c); and for unfair competition under
12 California Business & Professional Code § 17200 and California common law.
13 This Court has subject matter jurisdiction over the claims pursuant to 15 U.S.C. §
14 1121, and 28 U.S.C. §§ 1331 and 1338.

15 2. This Court has supplemental jurisdiction over the claims in this
16 Complaint that arise under state statutory and common law of the State of
17 California pursuant to 28 U.S.C. § 1367(a) because the state law claims are so
18 related to the federal claims that they form part of the same case or controversy
19 and derive from a common nucleus of operative facts.

20 3. Venue is proper in this Judicial District pursuant to 28 U.S.C. §
21 1391(b) as a substantial part of the events or omissions giving rise to the claim
22 and the threatened and actual harm to Plaintiffs occurred in this District by reason
23 of Defendants’ conduct as alleged below. Venue is also proper in this Judicial
24 District pursuant to 28 U.S.C. § 1391(b) because Defendants operate an office in
25 this District and reside in this District.

26 **Parties and Personal Jurisdiction**

27 4. Plaintiff Verizon California Inc. is a California corporation with its
28 principal place of business in Thousand Oaks, California (“Verizon California”).

1 5. Plaintiff Verizon Trademark Services LLC is a Delaware limited
2 liability company with its principal place of business in Arlington, Virginia
3 (“Verizon Trademark Services”).

4 6. Plaintiff Verizon Licensing Company is a Delaware corporation with
5 its principal place of business in Arlington, Virginia (“Verizon Licensing”).

6 7. Defendant Navigation Catalyst Systems, Inc. (“Navigation Catalyst”)
7 is a Delaware corporation having its place of business at 2141 Rosecrans Ave.
8 #3030, El Segundo, California, 90245. This Court has personal jurisdiction over
9 Defendant because it conducts substantial business within this district related to
10 the unlawful activities at issue in this Complaint, and operates an office within
11 this district. The harm suffered by Plaintiffs flows directly from the business
12 conducted by this Defendant within this district.

13 8. Defendant Basic Fusion, Inc. (“Basic Fusion”) is a Delaware
14 corporation having its place of business at 2141 Rosecrans Ave. #3030, El
15 Segundo, California, 90245. This Court has personal jurisdiction over Defendant
16 because it conducts substantial business within this district related to the unlawful
17 activities at issue in this Complaint, and operates an office within this district. The
18 harm suffered by Plaintiffs flows directly from the business conducted by this
19 Defendant within this district.

20 9. Navigation Catalyst and Basic Fusion (collectively “Defendants”)
21 each are working together or have worked together as a single entity, and in
22 collusion with each other, for the purpose of perpetrating the unlawful activities
23 complained of in this Complaint.

24 10. At all times material to this action, each of the Defendants was the
25 agent, servant, employee, partner, alter ego, subsidiary, or joint venturer of each
26 of the other Defendants, and the acts of each of Defendants were in the scope of
27 such relationship; in doing the acts and failing to act as alleged in this Complaint,
28 each of the Defendants acted with the knowledge, permission, and the consent of

1 each of the other Defendants; and each of Defendants aided and abetted the other
2 Defendants in the acts or omissions alleged in this Complaint.

3 **The Businesses of Plaintiffs**

4 **(a) Plaintiffs' Use of the VERIZON and VERIZON WIRELESS Trademarks**

5 11. In 2000, Bell Atlantic Corporation and GTE Corporation merged to
6 form Verizon Communications Inc. ("Verizon Communications"). Today,
7 Verizon Communications, its subsidiaries and affiliates, including Plaintiffs
8 Verizon California, Verizon Trademark Services and Verizon Licensing, form
9 one of the largest, well-known telecommunications companies in the world.
10 Verizon Communications' subsidiaries (collectively referred to as the "Verizon
11 Companies") provide a full array of communications and entertainment product
12 and service offerings, including local, long distance, and wireless telephone
13 services; Internet access; television services; phones; and related equipment. The
14 Verizon Companies have extensive operations in the United States and some of
15 the Verizon Companies also have operations throughout the world.

16 12. A publicly traded company on the New York Stock Exchange,
17 Verizon Communications generates annual consolidated operating revenues of
18 over ninety billion dollars (\$90,000,000,000.00), is a Dow 30 company, and ranks
19 in the top twenty (20) of the Fortune 500 list. The Verizon Companies employ a
20 diverse workforce of nearly two hundred and thirty five thousand (235,000)
21 employees.

22 13. Verizon Trademark Services owns the VERIZON and VERIZON
23 WIRELESS trademarks and trade names, as well as logo versions that include a
24 "V Design" above or to the left of the word marks VERIZON and VERIZON
25 WIRELESS (collectively, the "VERIZON Marks").

26 14. Verizon Licensing is the exclusive licensor of the VERIZON Marks
27 and has granted, directly or indirectly, licenses to use the VERIZON Marks to its
28 parent company, Verizon Communications, and to the various Verizon

1 Companies.

2 15. The VERIZON Marks were publicized as early as the first week in
3 April 2000, when Cellco Partnership d/b/a Verizon Wireless, then doing business
4 as Bell Atlantic Mobile, began doing business as “Verizon Wireless.” Upon the
5 launch of Verizon Wireless, on or about April 3, 2000, the VERIZON
6 WIRELESS name and trademark and related logos were featured on the Internet,
7 in television and radio advertisements, and in stories published in major
8 newspapers throughout the United States.

9 16. The Verizon Companies have offered and provided a full array of
10 communications and entertainment products and services under the VERIZON
11 Marks.

12 17. Currently, the Verizon Companies’ wireline business uses the
13 VERIZON Marks in connection with the provision of telephone and broadband
14 products and services to consumer and business customers in twenty eight (28)
15 states (including California where such products and services are provided by
16 Plaintiff Verizon California) and the District of Columbia serving a territory
17 consisting of more than 41.4 million access lines and 8.2 million broadband
18 connections. Telephone and broadband products and services include voice and
19 data transport, enhanced and custom calling features, network access, directory
20 assistance, private lines, public telephones, nationwide long distance services,
21 customer premises equipment distribution, data solutions and systems integration,
22 billing and collections, Internet access services and inventory management
23 services. The Verizon Companies’ wireline business also provides entertainment
24 products and services, including digital television, video on demand and online
25 games. Additionally, some of the Verizon Companies provide telephone and
26 broadband products and services to customers outside of the United States.

27 18. The VERIZON Marks are widely known and recognized among
28 consumers and members of the telecommunications industry.

1 19. The VERIZON Marks are unique and distinctive and, as such,
2 designate a single source of origin.

3 20. The Verizon Companies spend and have spent many millions of
4 dollars each year since 2000 to extensively advertise and promote VERIZON and
5 VERIZON WIRELESS branded products and services in the United States
6 through a variety of media, including television, radio, print advertisements,
7 direct mail, trade shows, conferences, and the Internet.

8 21. As a result of the Verizon Companies' extensive and exclusive use,
9 the VERIZON Marks have developed extensive goodwill in the market and are
10 extremely valuable to the Verizon Companies. Verizon Companies expend
11 substantial effort and expense to protect the VERIZON Marks and the VERIZON
12 Marks' distinctiveness in the marketplace.

13 22. Having been widely promoted to the general public, and having
14 exclusively identified the Verizon Companies and their products and services, the
15 VERIZON Marks symbolize the tremendous goodwill associated with the
16 Verizon Companies and are a property right of incalculable value. Further, the
17 VERIZON Marks have long enjoyed unquestionable fame as a result of favorable
18 general public acceptance and recognition.




19 23. The VERIZON and VERIZON WIRELESS marks are famous marks
20 protected under 15 U.S.C. § 1125(c).

21 24. The Verizon Companies' main Internet websites using the
22 VERIZON Marks and featuring information on many of the products and services
23 of the Verizon Companies can be accessed via the domain names verizon.com
24 verizon.net, and verizonwireless.com. Printouts from the websites at verizon.com,
25 verizon.net and verizonwireless.com evidencing such use of the VERIZON
26 Marks are attached as Exhibit 1.

27 25. The VERIZON Marks are valid and enforceable trademarks.

28 26. Verizon Trademark Services owns the following United States

1 trademark registrations for its various VERIZON Marks:

2 Trademark	3 Reg. No.	4 Goods/Services	5 Reg. Date
6 VERIZON	7 2,886,813	8 Various goods and services in Int'l Classes 9, 16, 35, 36, 37, 38, 41, and 42.	9 9/21/04
10 VERIZON	11 3,085,712	12 Various goods and services in Int'l Classes 9, 38, and 41.	13 4/25/06
14 	15 2,879,802	16 Various goods and services in Int'l Classes 9, 16, 35, 36, 37, 38, 41, and 42.	17 8/31/04
18 VERIZON WIRELESS	19 3,077,271	20 Various goods and services in Int'l Classes 9, 16, 35, 36, and 38.	21 4/4/06
22 	23 2,884,027	24 Various goods and services in Int'l Class 38.	25 9/14/04
26 	27 3,077,269	28 Various goods and services in Int'l Class 9.	4/4/06

21 Copies of the registration certificates for each registration are attached to this
22 Complaint as Exhibit 2.

23
24 **(b) Plaintiffs' Use of the VZ, VZACCESS, VZEMAIL,
25 VZGLOBAL, VZVOICE and VZW Trademarks**

26 27. Verizon Trademark Services owns the VZ, VZACCESS, VZEMAIL,
27 VZGLOBAL, VZVOICE and VZW trademarks (collectively, the "VZ Marks").

28 28. Verizon Licensing is the exclusive licensor of the VZ Marks, and has

1 granted, directly or indirectly, licenses to use the VZ Marks to the various
2 subsidiaries of Verizon Communications.

3 29. The VZ trademark was first used on or about July 3, 2000. The VZW
4 trademark was first used on or about August 15, 2000. The VZACCESS,
5 VZEMAIL, VZGLOBAL and VZVOICE trademarks were first used on or about
6 September 29, 2003.

7 30. The Verizon Companies have offered and provided a full array of
8 communications and entertainment products and services under the VZ Marks.

9 31. The Verizon Companies use the VZ Marks to provide wireless voice
10 and data services to over 65.7 million customers nationwide and use the VZ
11 Marks in connection with the provision of the wireless voice and data services in
12 California and in interstate commerce.

13 32. The VZ Marks are widely known and recognized among consumers
14 and members of the telecommunications industry.

15 33. The VZ Marks are unique and distinctive and, as such, designate a
16 single source of origin.

17 34. The Verizon Companies spend and have spent significant amounts of
18 money each year since 2003 to advertise and promote the aforementioned
19 products and services in the United States in connection with the VZ Marks.

20 35. As a result of the Verizon Companies' extensive and exclusive use,
21 the VZ Marks have developed extensive goodwill in the market and are extremely
22 valuable to the Verizon Companies. Verizon Companies expend substantial effort
23 and expense to protect the VZ Marks and the VZ Marks' distinctiveness in the
24 marketplace.

25 36. Having been widely promoted to the general public, and having
26 exclusively identified the Verizon Companies and their products and services the
27 VZ Marks symbolize the tremendous goodwill associated with the Verizon
28 Companies and are a property right of incalculable value.

1 38. The Verizon Companies' main Internet websites using the VZ Marks
2 and featuring information on many of the products and services of the Verizon
3 Companies can be accessed via the domain names verizon.com verizon.net, and
4 verizonwireless.com. Printouts from the websites at vzw.com, vzw.msn.com and
5 verizon.com evidencing such use of the VZ Marks are attached as Exhibit 3.

6 39. The VZ Marks are valid and enforceable trademarks.

7 40. Verizon Trademark Services owns the following United States
8 trademark registrations for its VZ Marks:

9 Trademark	Reg. No.	Goods/Services	Reg. Date
10 VZ	3,064,237	Various goods and services in Int'l Classes 16 and 41.	2/28/06
11 VZACCESS	2,973,813	Various services in Int'l Class 38.	7/19/05
12 VZEMAIL	2,973,814	Various services in Int'l Class 38.	7/19/05
13 VZGLOBAL	3,083,568	Various services in Int'l Class 38.	4/18/06
14 VZVOICE	2,973,811	Various services in Int'l Class 38.	7/19/05
15 VZW	3,319,338	Various services in Int'l Class 38.	10/23/07

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23 Copies of the registration certificates for each registration are attached to this
24 Complaint as Exhibit 4.

25 (c) **Plaintiffs' Use of the FIOS and VERIZON FIOS Trademarks**

26 37. Verizon Trademark Services owns the FIOS and VERIZON FIOS
27 trademarks (collectively, the "VERIZON FIOS Marks").

28 38. Verizon Licensing is the exclusive licensor of the VERIZON FIOS

1 Marks, and has granted, directly or indirectly, licenses to use the VERIZON FIOS
2 Marks to the various subsidiaries of Verizon Communications.

3 39. The Verizon Companies wireline business, including Plaintiff
4 Verizon California, have offered and provided communications and entertainment
5 products and services under the VERIZON FIOS Marks since at least as early as
6 August 2004.

7 40. The Verizon Companies' services provided under the VERIZON
8 FIOS Marks include broadband and television services. The broadband services
9 are designed to provide the fastest and most powerful Internet access offered by
10 the Verizon Companies. The television services include one hundred percent
11 (100%) all digital programming, movies and sports channels, premium and
12 international channels, expansive HD programming, a video on demand library,
13 interactive features, digital video recording and fiber-quality picture and sound.

14 41. The Verizon Companies' services are available to users connected to
15 the Verizon network via the Verizon Companies' "Fiber-To-The-Premises," or
16 FTTP, program. The FTTP program refers to the Verizon Companies' network
17 upgrade that utilizes fiber-optic cables and associated optical electronics instead
18 of copper wire to connect customers to the Verizon network and provide voice
19 services and associated features while offering nearly unlimited bandwidth for an
20 array of data and video applications.

21 42. The VERIZON FIOS Marks are unique and distinctive and, as such,
22 designate a single source of origin.

23 43. The Verizon Companies spend and have spent significant amounts of
24 money each year since 2004 to advertise and promote the aforementioned
25 products and services in the United States in connection with the VERIZON
26 FIOS Marks.

27 44. As a result of the Verizon Companies' extensive and exclusive use,
28 the VERIZON FIOS Marks have developed extensive goodwill in the market and

1 are extremely valuable to the Verizon Companies. The Verizon Companies
2 expend substantial effort and expense to protect the VERIZON FIOS Marks and
3 the VERIZON FIOS Marks' distinctiveness in the marketplace.

4 45. Having been widely promoted to the general public, and having
5 exclusively identified the Verizon Companies and their products and services, the
6 VERIZON FIOS Marks symbolize the tremendous goodwill associated with the
7 Verizon Companies and is a property right of incalculable value.

8 41. The Verizon Companies' main Internet websites using the
9 VERIZON FIOS Marks and featuring information on many of the products and
10 services of the Verizon Companies can be accessed via the domain names
11 verizon.com and verizonfios.com, which have used the VERIZON FIOS Marks
12 since at least as early as August 2004. A printout from the website at
13 verizonfios.com evidencing such use of the VERIZON FIOS Marks is attached as
14 Exhibit 5.

15 42. The VERIZON FIOS Marks are valid and enforceable trademarks.

16 43. Verizon Trademark Services owns the following United States
17 trademark registrations for its various VERIZON FIOS Marks:

18 Trademark	Reg. No.	Goods/Services	Reg. Date
19 FIOS	3,001,081	20 Various goods and services in Int'l Classes 37 and 38.	09/27/05
21 VERIZON FIOS	3,147,510	22 Various goods and services in Int'l Classes 37 and 38.	09/26/06

23
24 Copies of the registration certificates for each registration are attached to this
25 Complaint as Exhibit 6.

26 The Business of Defendants

27 44. Plaintiffs are informed and believe and on that basis allege that Basic
28 Fusion is a registrar of Internet domain names accredited by the Internet

1 Corporation for Assigned Names and Numbers (“ICANN”).

2 45. Plaintiffs are informed and believe and on that basis allege that
3 Defendants have registered and used over three million (3,000,000)
4 domain names (“Defendants’ Domain Names”).

5 46. Plaintiffs are informed and believe and on that basis allege that
6 Defendants have used and are using an automated process to register Defendants’
7 Domain Names.

8 47. Plaintiffs are informed and believe and on that basis allege that many
9 of Defendants’ Domain Names are confusingly similar to famous or distinctive
10 trademarks owned by others. (“Confusingly Similar Domain Names”). A list
11 detailing some of the Confusingly Similar Domain Names is attached to this
12 Complaint as Exhibit 5. Notwithstanding that Defendant has targeted nearly every
13 single famous trademark in existence, for the sake of brevity the list of Exhibit 7
14 details only one famous trademark for each letter of the alphabet.

15 48. Plaintiffs are informed and believe, and on that basis allege, that one
16 or more of Defendants was or is the registrant for each of Defendants’ Domain
17 Names.

18 49. Defendants registered Defendants’ Domain Names for their own use,
19 i.e. Defendants are both the registrar and registrant of Defendants’ Domain
20 Names.

21 50. At the time Defendants registered each of Defendants’ Domain
22 Names, Defendants did not have an identifiable customer for Defendants’
23 Domain Names, other than one of Defendants or an affiliated entity.

24 51. One or more of Defendants was or is also the registrar for each of
25 Defendants’ Domain Names.

26 52. Basic Fusion, as an ICANN-accredited registrar, has direct access to
27 register Internet domain names via one or more Internet registries, including the
28 .com and .net registries operated by VeriSign, Inc.

1 53. Plaintiffs are informed and believe and on that basis allege that
 2 Defendants operate websites at each of the Confusingly Similar Domain Names
 3 which display Hypertext Markup Language (“HTML”) links featuring goods or
 4 services that are directly competitive with those sold or provided in connection
 5 with the famous or distinctive trademarks.

6 Defendants and Their Wrongful Conduct

7 54. Plaintiffs have not authorized Defendants to use in any way the
 8 VERIZON Marks, the VZ Marks or the VERIZON FIOS Marks.

9 55. Plaintiffs are informed and believe and on that basis allege that
 10 Defendants have registered over one thousand three hundred and fifty seven
 11 (1,357) domain names which are confusingly similar to the VERIZON Marks, the
 12 VZ Marks or the VERIZON FIOS Marks, including at least the following:

13 222verizon.com	freeverizonmminutes.com
14 252fverizon.net	freevirizonringtones.com
15 2verizon.net	frweverizon.com
16 40verizon.net	helpverison.com
17 40verizonbusiness.com	homephoneserviceverison.com
18 40verizonwireless.com	homeveriizon.net
19 40verizonwireless.com	homeverison.com
20 activatemyverizon.net	homeverizin.net
21 activateverison.com	homeverozon.net
22 activateverizion.com	homeverzon.net
23 aerizonwireless.com	homevirizon.net
24 animeverison.com	homevwrizon.net
25 averisonline.com	homezerizon.net
26 cellularverison.com	hpttverizon.net
27 cerizonwirless.com	httverizon.net
28 comerizonwireless.com	inpulseverisonwireless.com
comverison.net	mhasbjverizon.net
downloadverizondsl.com	myaccountatverisonwireless.com
dslstartveizon.net	myaccountverisonwireless.com
dslstverizon.net	myaccountverizionwireless.com
dslverisonstart.com	myaccountvirizonewireless.com
ebillpayverison.com	myerizon.com
erizonphones.com	myprepaidverizon.com
eroesverizon.com	myverisonprepaid.com
freecerizon.com	myverisonprepay.com
freetextmessagingtoverizon.com	myverisonwireless.com
freeverisongames.com	myverizionaccount.com
freeverisonphones.com	myverizionwirelessprepaid.com
freeverizonwirelessringtones.com	myverizonair.com
freeverizionwirelessringtones.com	myverizoncentral.com
freeverizoncellphones.com	myverizonprepay.com

1	oldverison.net	veizonwieless.com
	omeverizon.net	veizonwireles.com
2	onlinevorizon.net	veizonwirelss.com
	paymyverizonphonebill.com	veizonwirereless.com
3	pimpverizon.com	veizonwirles.com
	portalverizon.net	veizonwreless.com
4	prepaidverison.com	ver4izon.com
	prepaidverizion.com	ver5izonwireless.com
5	prepayverison.com	ver8izon.net
	prepiadvirizonwireless.com	vereizon.net
6	rebateverizonwireless.com	vereizoncentral.com
	ringbacktonesverizionwireless.com	vererizon.net
7	ringbacktonesverizon.com	verfizonwireless.com
	rringtonesverizon.com	veri8zon.net
8	search20verizowireless.com	veri9zonwireles.com
	searchverizon.com	veri9zonwireless.com
9	searchverizon.net	veriaoncentral.com
	searchverizonwierless.com	veriaonmail.com
10	searchverizonwirelees.com	veriaonwirelless.com
	searchverizonwireless.com	veriaonwirless.com
11	searchverzon.com	veriizonwierless.com
	searchvirizonwireless.com	veriizonwireless.com
12	shoppingforverizonwireless.com	veriizonworeless.com
	startveizon.net	verijzon.com
13	startverion.net	verikzon.com
	startverizion.net	verion22.com
14	startverizo.net	verionbusiness.com
	startverzon.net	verioncentral.com
15	testverizon.net	verioneless.com
	unverison.com	verionireless.com
16	vaerizon.net	verionmobile.com
	varizones.com	veriononline.net
17	vberizonwirelesstones.com	verionpix.com
	vbverisonwireless.com	verionrewards.com
18	ve3rizon.com	verionscellphones.com
	ve3rizonrfewards.com	verionsonwireless.com
19	ve4rizonwireless.com	verionswirerless.com
	ve5rizon.com	verionwererless.com
20	vederizon.net	verionwierless.com
	veerizonwireless.com	verionwire.com
21	veerizoncentral.com	verionwireles.com
	veerizonpages.com	verionwirelessamphitheatre.com
22	veerizonwireles.com	verionwirelessmyprepaid.com
	veerizonwirelesspr.com	verionwirelessprepaid.com
23	vefrizon.net	verionwirelss.com
	veizoncenter.com	verionwiresless.com
24	veizoncentral.com	verionwires.com
	veizonchocolate.com	verionz.net
25	veizonemaillogin.com	verionzon.com
	veizonhome.com	veriosin.com
26	veizonnetmail.net	veriosion.com
	veizononline.net	veriosionwireless.com
27	veizonphones.com	veriosn.com
	veizonpr.net	veriozoncellphones.com
28	veizonringtons.com	veriozonmobile.com

1	veriozonringtones.com	verisonstores.com
	veriozonwireles.com	verisontheatre.com
2	veriozonwirelss.com	verisonvireless.com
	verison20wireless.com	verisonvision.com
3	verisonaccount.com	verisonwebmail.net
	verisonampatheatre.com	verisonwereless.com
4	verisonaphitheater.com	verisonwireless.com
	verisonarena.com	verisonwhireless.com
5	verisonbilling.com	verisonwiereless.com
	verisonbussiness.com	verisonwierlessmusiccenter.com
6	verisonc.com	verisonwierlessstore.com
	verisoncareer.com	verisonwierlos.com
7	verisoncareers.com	verisonwierrless.com
	verisoncarrers.com	verisonwiles.com
8	verisoncell.com	verisonwilress.com
	verisoncellphone.com	verisonwireelss.com
9	verisoncentarl.com	verisonwireerless.com
	verisoncenter.com	verisonwirel.com
10	verisoncentral.com	verisonwirelessmyprepaid.com
	verisonconcerttickets.com	verisonwirelessprepaid.com
11	verisonddsl.com	verisonwirelessamphitheater.com
	verisondirectory.com	verisonwirelessampitheater.com
12	verisonemployment.com	verisonwirelessampitheatre.com
	verisonfreegames.net	verisonwirelessamptheater.com
13	verisongamesondemand.com	verisonwirelessbill.com
	verisonhelp.com	verisonwirelesscellphone.com
14	verisonhighspeedinternet.com	verisonwirelesscellularphones.com
	verisonimpulse.com	verisonwirelesscenter.com
15	verisonimpulse.com	verisonwirelesschaperone.com
	verisoninpluse.com	verisonwirelessfreepay.com
16	verisonireless.com	verisonwirelessgetdiscounts.com
	verisonjuke.com	verisonwirelessgetitnow.com
17	verisonmail.com	verisonwirelessjobs.com
	verisonmail.net	verisonwirelessjuke.com
18	verisonmierless.com	verisonwirelessmusiccenter.com
	verisonmobel.com	verisonwirelessmusicmanager.com
19	verisonmobil.com	verisonwirelessmyacount.com
	verisonmobileusa.com	verisonwirelessmyprepaid.com
20	verisonmyprepaid.com	verisonwirelessmyprepay.com
	verisonn.com	verisonwirelesspic.com
21	verisonnetwork.com	verisonwirelesspicplace.com
	verisonnews.com	verisonwirelesspixplace.com
22	verisonpayasyougo.com	verisonwirelessplans.com
	verisonphonebook.com	verisonwirelessprepaidphones.com
23	verisonpic.com	verisonwirelessprepay.com
	verisonpicplace.com	verisonwirelessprepayphone.com
24	verisonpimp.com	verisonwirelessprephones.com
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| 3 | (collectively, the "VERIZON Related Domain Names"). | |
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| | search20vzwpix.com | vzrpixplace.com |
| 19 | searchvzw.com | vzrwireless.com |
| | searchvzwpics.com | vzstore.com |
| 20 | searchvzwpix.com | vzswpix.com |
| | supportvzm.com | vztexts.com |
| 21 | supportvzw.com | vztones.com |
| | svzwpix.com | vztwpix.com |
| 22 | textvzw.com | vzvchaperone.com |
| | tonsvzw.com | vzvpics.com |
| 23 | vvvzwpix.com | vzw22.com |
| | vzactivation.com | vzw2g.com |
| 24 | vzbenifits.com | vzw2pix.com |
| | vzcarrers.com | vzw3.com |
| 25 | vzcellphonesettlement.com | vzwaboutu.com |
| | vzcentral.net | vzwaboutyou.com |
| 26 | vzcpix.com | vzwaboutyou.net |
| | vzepixplace.com | vzwaccesspix.com |
| 27 | vzflix.net | vzwacct.com |
| | vzmmyprepay.com | vzwactivate.com |
| 28 | vzmovies.com | vzwactivateimpulse.com |

- 1 vzw-activateimpulse.com vzwjobs.com
- vzwactivateinpluse.com vzwjuke.com
- 2 vzwactivateinpulse.com vzwjukebox.com
- vzwactivation.com vzwj.com
- 3 vzwallaccess.com vzwless.com
- vzwbackupassistance.com vzwlgchocolate.com
- 4 vzwbackupassistant.com vzwmedia.com
- vzwbenedits.com vzwmesseges.com
- 5 vzwbennifits.com vzwmsg.com
- vzwblackberry.net vzwmusicmanager.com
- 6 vzwbonousbuck.com vzwmyperpaid.com
- vzwbonusbuck.com vzwmypic.com
- 7 vzwcareer.com vzwmypixplace.com
- vzwcarrers.com vzwmyrepaid.com
- 8 vzwchaperon.com vzwmyrepaidaccount.com
- vzwchocolate.com vzwmyrepayaccount.com
- 9 vzwcore.com vzwmyrepayed.com
- vzwdefaulttone.com vzwmyringbacktones.com
- 10 vzwdiscount.com vzwnpix.com
- vzwdiscounts.com vzwopix.com
- 11 vzwwebbenefits.com vzwpcs.com
- vzwwebvzwcorp.com vzwphoes.com
- 12 vzwemployee.com vzwphones.com
- vzwepix.com vzwphoto.com
- 13 vzw-flix.com vzwphotoalbum.com
- vzwflixnpix.com vzwphotos.com
- 14 vzwflixpix.com vzwpicflix.com
- vzwflx.com vzwpics.com
- 15 vzw-free-msg.com vzwpicplace.com
- vzwfreepics.com vzwpics.net
- 16 vzwfreeringbacktones.com vzwpicsplace.com
- vzwgetdiscounts.com vzwpictureplace.com
- 17 vzwgetnow.com vzwpictures.com
- vzwgetpix.com vzwpicxflix.com
- 18 vzwgmaes.com vzwpiix.com
- vzwgo.com vzwpimp.com
- 19 vzwgopix.com vzwpixd.com
- vzwgovtprogram.com vzwpixflex.com
- 20 vzwhomepage.com vzwpixflicks.com
- vzw hubs.com vzwpix-flix.com
- 21 vzwhut.com vzwpixi.com
- vzwierless.com vzwpixic.com
- 22 vzwimpulse.com vzwpixis.com
- vzwinpluse.com vzwpixl.com
- 23 vzwinternational.com vzwpixlogin.com
- vzwipix.com vzwpixmessaging.com
- 24 vzwirelessphotos.com vzwpixonline.com
- vzwirelesspic.com vzwpixpace.com
- 25 vzwirelesspix.com vzwpixpalace.com
- vzwirelesspixs.com vzwpixplacce.com
- 26 vzwirelessrbt.com vzw-pixplace.com
- vzwirelessringbacktones.com vzwpix-place.com
- 27 vzwirelessringtones.com vzw-pix-place.com
- vzwirles.com vzwpixplacelogin.com
- 28 vzwjob.com vzwpixplave.com

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| 1 | vzwpixplce.com | vzwtonedelux.com |
| | vzwpixsplace.com | vzwtonesdelux.com |
| 2 | vzwpixz.com | vzwtonesdeluxe.com |
| | vzwpiz.com | vzwtunes.com |
| 3 | vzwpizplace.com | vzwvbenefits.com |
| | vzwpizs.com | vzwverison.com |
| 4 | vzwplace.com | vzwviewpics.com |
| | vzwplx.com | vzwvip.com |
| 5 | vzwppics.com | vzwwirelesspix.com |
| | vzwprepay.com | vzwwpix.com |
| 6 | vzwprepayaccount.com | vzwwwpix.com |
| | vzwprepayed.com | vzwzpix.com |
| 7 | vzwprepayphones.com | vzxpics.com |
| | vzwpuix.com | vzxpixs.com |
| 8 | vzwpixflx.com | vzxringbacktones.com |
| | vzwpixplace.com | vzxw.com |
| 9 | vzwrbtone.com | vzxwpix.com |
| | vzwrbts.com | vzypics.com |
| 10 | vzwringbacktones.com | vzypix.com |
| | vzwrinback.com | vzzactivateinpulse.com |
| 11 | vzwringback.com | vzzpics.com |
| | vzwringbacks.com | vzzwpics.com |
| 12 | vzwringbacktonez.com | vzzzzwpix.com |
| | vzwringbactones.com | webmailvzw.com |
| 13 | vzwringtones.com | wirelessvz.com |
| | vzw-ringtones.com | wwwvzwpx.com |
| 14 | vzwringtons.com | wwwmvzwpix.com |
| | vzwshope.com | wwwringbacktonesvzw.com |
| 15 | vzwsix.com | wwwvznavigator.com |
| | vzwskin.com | wwwvznpix.com |
| 16 | vzwspx.com | wwwvzwmyprepayed.com |
| | vzwszhop.com | wwwvzwpic.com |
| 17 | vzwtx.com | wwwvzwpixflix.com |
| | vzwtextmessage.com | wwwvzwpiz.com |
| 18 | vzwtexts.com | wwwvzwpushtotalk.com |
| | vzwtones.com | wwwvzwtones.com |
| 19 | vzwtx.com | wwwvzxpix.com |
| | vzwtoday.com | wwwvzwpx.com |

20 (collectively, the “VZ Related Domain Names”).

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|----|------------------------|------------------|
| 21 | activatemifios.net | rfios.com |
| 22 | fios.com | verisonfious.com |
| | fiosbundle.net | verizionfios.com |
| 23 | fiosbundleterms.com | verizonfios.com |
| | fiosdz.com | verizonfois.net |
| 24 | fioshelpatverizon.com | verzionfios.net |
| | fiosreferral.com | virisonfios.com |
| 25 | fiosrefferal.com | vrrizonfios.com |
| 26 | netfiosbundleterms.com | |

27 (collectively, the “VERIZON FIOS Related Domain Names”). The VERIZON
 28 Related Domain Names and the VZ Related Domain Names and the VERIZON

1 FIOS Related Domain Names are collectively referred to as the “Infringing
2 Domain Names.” A printout of the whois ownership records for many of these
3 domain names is attached to this Complaint as Exhibit 8.

4 56. Plaintiffs are informed and believe and on that basis allege that many
5 of the Infringing Domain Names were used by Defendants but then deleted within
6 5 days so that Defendants could receive a refund of Defendants’ Internet domain
7 name registration costs.

8 57. Plaintiffs are informed and believe and on that basis allege that each
9 of the VERIZON Related Domain Names is confusingly similar to the VERIZON
10 Marks and the VZ Marks and that each of the VERIZON FIOS Related Domain
11 Names is confusingly similar to the VERIZON FIOS Marks, the VZ Marks or the
12 VERIZON Marks.

13 58. Plaintiffs are informed and believe and on that basis allege that
14 Defendants used the Infringing Domain Names to divert for commercial gain
15 Internet users searching for the VERIZON Marks, the VZ Marks and the
16 VERIZON FIOS Marks.

17 59. Plaintiffs are informed and believe and on that basis allege that
18 Defendants hosted a website at each of the Infringing Domain Names which
19 displayed HTML links featuring advertisements for goods and services that are
20 directly competitive with those sold or provided in connection with the
21 VERIZON Marks, the VZ Marks or the VERIZON FIOS Marks. Printouts from
22 the websites at many of the Infringing Domain Names are attached to this
23 Complaint as Exhibit 9.

24 60. Plaintiffs are informed and believe and on that basis allege that when
25 Internet users clicked on one or more of the displayed HTML links on the website
26 hosted at each of the Infringing Domain Names that Defendants received
27 payments from one or more advertisers, search engines, or affiliate programs.

28 **Harm to Plaintiffs and the General Public**

1 61. Defendants' unauthorized registration and use of the Infringing
2 Domain Names is likely to cause confusion, mistake, and deception as to the
3 source or origin of the Infringing Domain Names, and is likely to falsely suggest
4 a sponsorship, connection, license, or association of Defendants, and the
5 Infringing Domain Names with Plaintiffs.

6 62. Defendants' activities have irreparably harmed and, if not enjoined,
7 will continue to irreparably harm Plaintiffs and the long-used and federally
8 registered VERIZON Marks, VZ Marks and VERIZON FIOS Marks.

9 63. Defendants' activities have irreparably harmed, and if not enjoined,
10 will continue to irreparably harm the general public who has an inherent interest
11 in being free from confusion, mistake, and deception.

12 **FIRST CAUSE OF ACTION**

13 **[Cybersquatting on the VERIZON Marks, the VZ Marks and**
14 **the VERIZON FIOS Marks Under 15 U.S.C. § 1125(d)]**

15 64. Plaintiffs reallege and incorporate by reference Paragraphs 1 through
16 63 as though fully set forth here.

17 65. Plaintiffs are informed and believe and on that basis allege that
18 Defendants registered and used the Infringing Domain Names.

19 66. The VERIZON Marks, the VZ Marks and the VERIZON FIOS
20 Marks were distinctive and federally registered at the USPTO at the time
21 Defendants registered and used the Infringing Domain Names.

22 67. The Infringing Domain Names are confusingly similar to the
23 VERIZON Marks, the VZ Marks and the VERIZON FIOS Marks.

24 68. Plaintiffs are informed and believe and on that basis allege
25 Defendants registered, trafficked in, or used the Infringing Domain Names in bad
26 faith and with a bad faith intent to profit from the goodwill long established by
27 Plaintiffs in the VERIZON Marks, the VZ Marks and the VERIZON FIOS
28 Marks.

1 69. Defendants do not have any intellectual property rights or any other
2 rights in the VERIZON Marks, the VZ Marks or the VERIZON FIOS Marks.

3 70. Plaintiffs are informed and believe and on that basis allege that none
4 of the Infringing Domain Names consist of the legal name of any Defendants, nor
5 a name that is otherwise commonly used to identify any Defendants.

6 71. Plaintiffs are informed and believe and on that basis allege that
7 Defendants have not made any prior use of any of the Infringing Domain Names
8 in connection with the *bona fide* offering of any goods or services.

9 72. Plaintiffs are informed and believe and on that basis allege that
10 Defendants have not made any *bona fide* fair use of the VERIZON Marks, the VZ
11 Marks or the VERIZON FIOS Marks on a website accessible under any of the
12 Infringing Domain Names.

13 73. Plaintiffs are informed and believe and on that basis allege that
14 Defendants registered and used the Infringing Domain Names to divert
15 consumers from Verizon's website to a website accessible under the Infringing
16 Domain Names for Defendants' commercial gain by creating a likelihood of
17 confusion as to the source, sponsorship, affiliation, or endorsement of the website.

18 74. Defendants' registration, use, or trafficking in the Infringing Domain
19 Names constitutes cybersquatting in violation of 15 U.S.C. § 1125(d), entitling
20 Plaintiffs to relief.

21 75. By reason of Defendants' acts alleged herein, Plaintiffs' remedy at
22 law is not adequate to compensate them for the injuries inflicted by Defendants.
23 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
24 pursuant to 15 U.S.C. § 1116.

25 76. By reason of Defendants' acts alleged herein, Plaintiffs are entitled
26 to recover Defendants' profits, actual damages and the costs of the action, or
27 statutory damages under 15 U.S.C. § 1117, on election by Plaintiffs, in an amount
28 of one hundred thousand dollars (\$100,000) per domain name infringement.

1 77. This is an exceptional case making Plaintiffs eligible for an award of
2 attorneys' fees under 15 U.S.C. § 1117.

3 **SECOND CAUSE OF ACTION**

4 **[Trademark Infringement of the VERIZON Marks, the VZ Marks and**
5 **the VERIZON FIOS Marks Under 15 U.S.C. § 1114(1)]**

6 78. Plaintiffs reallege and incorporate by reference each of the
7 allegations contained in Paragraphs 1 through 77 of this Complaint as though
8 fully set forth here.

9 79. Defendants' use in commerce of the VERIZON Marks, the VZ
10 Marks, the VERIZON FIOS Marks and the Infringing Domain Names and the
11 websites and advertisements displayed at the Infringing Domain Names, is likely
12 to cause confusion, mistake, and to deceive.

13 80. Defendants' use of the VERIZON Marks, the VZ Marks, the
14 VERIZON FIOS Marks and the Infringing Domain Names is likely to cause
15 initial interest confusion among the general public.

16 81. The above-described acts of Defendants constitute trademark
17 infringement in violation of 15 U.S.C. § 1114(1), entitling Plaintiffs to relief.

18 82. Defendants have unfairly profited from the infringing actions
19 alleged.

20 83. By reason of Defendants' acts, Plaintiffs have suffered damage to the
21 goodwill associated with the VERIZON Marks, the VZ Marks and the VERIZON
22 FIOS Marks.

23 84. Defendants' activities have irreparably harmed and, if not enjoined,
24 will continue to irreparably harm Plaintiffs and their long-used and federally
25 registered VERIZON Marks, the VZ Marks and the VERIZON FIOS Marks.

26 85. Defendants' activities have irreparably harmed, and if not enjoined,
27 will continue to irreparably harm the general public who has an interest in being
28 free from confusion, mistake, and deception.

1 86. By reason of Defendants' acts, Plaintiffs' remedy at law is not
2 adequate to compensate them for the injuries inflicted by Defendants.
3 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
4 pursuant to 15 U.S.C. § 1116.

5 87. By reason of Defendants' willful acts, Plaintiffs are entitled to
6 damages, and that those damages be trebled under 15 U.S.C. § 1117.

7 88. This is an exceptional case making Plaintiffs eligible for an award of
8 attorneys' fees under 15 U.S.C. § 1117.

9 **THIRD CAUSE OF ACTION**

10 **[False Designation of Origin of the VERIZON Marks, the VZ Marks and**
11 **the VERIZON FIOS Marks Under 15 U.S.C. § 1125(a)]**

12 89. Plaintiffs reallege and incorporate by reference each of the
13 allegations contained in Paragraphs 1 through 88 of this Complaint as though
14 fully set forth here.

15 90. Defendants' use in commerce of the VERIZON Marks, the VZ
16 Marks, the VERIZON FIOS Marks and the Infringing Domain Names is likely to
17 cause confusion, or to cause mistake, or to deceive the relevant public that the
18 Verizon Related Domain Names and the websites and advertisements displayed at
19 the Verizon Related Domain Names are authorized, sponsored or approved by or
20 are affiliated with Plaintiffs.

21 91. Defendants' use of the VERIZON Marks, the VZ Marks, the
22 VERIZON FIOS Marks and the Infringing Domain Names is likely to cause
23 initial interest confusion among the general public.

24 92. The above-described acts of Defendants constitute trademark
25 infringement of the VERIZON Marks, the VZ Marks and the VERIZON FIOS
26 Marks and false designation of origin in violation of 15 U.S.C. § 1125(a),
27 entitling Plaintiffs to relief.

28 93. Defendants have unfairly profited from the actions alleged.

1 94. By reason of Defendants' acts alleged herein, Plaintiffs have suffered
2 damage to the goodwill associated with the VERIZON Marks, the VZ Marks and
3 the VERIZON FIOS Marks.

4 95. Defendants' activities have irreparably harmed and, if not enjoined,
5 will continue to irreparably harm Plaintiffs and their long-used VERIZON Marks,
6 VZ Marks and VERIZON FIOS Marks.

7 96. Defendants' activities have irreparably harmed, and if not enjoined,
8 will continue to irreparably harm the general public who has an interest in being
9 free from confusion, mistake, and deception.

10 97. By reason of Defendants' acts alleged herein, Plaintiffs' remedy at
11 law is not adequate to compensate them for the injuries inflicted by Defendants.
12 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
13 pursuant to 15 U.S.C. § 1116.

14 98. By reason of Defendants' willful acts, Plaintiffs are entitled to
15 damages, and that those damages be trebled, under 15 U.S.C. § 1117.

16 99. This is an exceptional case making Plaintiffs eligible for an award of
17 attorneys' fees under 15 U.S.C. § 1117.

18 **FOURTH CAUSE OF ACTION**

19 **[Dilution of the VERIZON Marks Under 15 U.S.C. § 1125(c)]**

20 100. Plaintiffs reallege and incorporate by reference each of the
21 allegations contained in Paragraphs 1 through 99 of this Complaint as though
22 fully set forth here.

23 101. The VERIZON Marks are famous, as that term is used in 15 U.S.C.
24 § 1125(c), and were famous before Defendants' use of the VERIZON Marks and
25 the VERIZON Related Domain Names in commerce, based on, among other
26 things, the inherent distinctiveness and federal registration of the VERIZON
27 Marks and the extensive, and exclusive nationwide use, advertising, promotion,
28 and recognition of the and VERIZON Marks.

1 102. Defendants' use of the VERIZON Marks and the VERIZON Related
2 Domain Names in commerce is likely to cause dilution by blurring or dilution by
3 tarnishment of the VERIZON Marks.

4 103. The above-described acts of Defendants constitute dilution by
5 blurring and dilution by tarnishment in violation of 15 U.S.C. § 1125(c), entitling
6 Plaintiffs to relief.

7 104. Defendants have unfairly profited from the actions alleged.

8 105. By reason of Defendants' acts, Plaintiffs have suffered damage to the
9 goodwill associated with the VERIZON Marks and have suffered irreparable
10 harm.

11 106. By reason of Defendants' acts, Plaintiffs' remedy at law is not
12 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
13 pursuant to 15 U.S.C. § 1116.

14 107. By reason of Defendants' willful acts, Plaintiffs are entitled to
15 damages, and that those damages be trebled, under 15 U.S.C. § 1117.

16 108. This is an exceptional case making Plaintiffs eligible for an award of
17 attorneys' fees under 15 U.S.C. § 1117.

18 **FIFTH CAUSE OF ACTION**

19 **[Trademark Infringement of the VERIZON Marks, the VZ Marks and the**
20 **VERIZON FIOS Marks Under California Business & Professions Code**
21 **§ 14320 and California Common Law]**

22 109. Plaintiffs reallege and incorporate by reference each of the
23 allegations contained in Paragraphs 1 through 108 of this Complaint as though
24 fully set forth herein.

25 110. Defendants have used in commerce the VERIZON Marks, the VZ
26 Marks, the VERIZON FIOS Marks and the Infringing Domain Names in
27 connection with their business.

28 111. Defendants' use in commerce of the VERIZON Marks, the VZ

1 Marks, the VERIZON FIOS Marks and the Infringing Domain Names in
2 connection with Defendants' services is likely to cause confusion or mistake or to
3 deceive as to the source of origin of those services.

4 112. The above-described acts of Defendants constitute trademark
5 infringement in violation of California Business & Professions Code § 14320 and
6 under the common law of the State of California, entitling Plaintiffs to relief.

7 113. Defendants have unfairly profited from the actions alleged herein.

8 114. By reason of Defendants' acts alleged herein, Plaintiffs have suffered
9 damage to the goodwill associated with the VERIZON Marks, the VZ Marks and
10 the VERIZON FIOS Marks and have suffered irreparable harm.

11 115. By reason of Defendants' acts alleged herein, Plaintiffs' remedy at
12 law is not adequate to compensate them for the injuries inflicted by Defendants.
13 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
14 pursuant to California Business & Professions Code § 14335.

15 **SIXTH CAUSE OF ACTION**

16 **[Unfair Competition With Plaintiffs Under California Business &**
17 **Professions Code § 17200 and California Common Law]**

18 116. Plaintiffs reallege and incorporate by reference each of the
19 allegations contained in Paragraphs 1 through 115 of this Complaint as though
20 fully set forth herein.

21 117. Defendants have infringed the VERIZON Marks, the VZ Marks and
22 the VERIZON FIOS Marks in violation of Plaintiffs' proprietary rights. Such acts
23 constitute unfair trade practices and unfair competition under California Business
24 and Professions Code §§ 17200 *et seq.*, and under the common law of the State of
25 California, entitling Plaintiffs to relief.

26 118. Pursuant to California Business and Professions Code § 17203,
27 Defendants are required to disgorge and restore to Plaintiffs all profits and
28 property acquired by means of Defendants' unfair competition.

1 119. Due to the conduct of Defendants, Plaintiffs have suffered
2 irreparable harm, have suffered injury in fact and have lost money or property as
3 a result of Defendants' acts of unfair business practices alleged herein. It would
4 be difficult to ascertain the amount of money damages that would afford Plaintiffs
5 adequate relief at law for Defendants' acts. Plaintiffs' remedy at law is not
6 adequate to compensate Plaintiffs for the injuries inflicted by Defendants.
7 Accordingly, Plaintiffs are entitled to preliminary and permanent injunctive relief
8 pursuant to California Business and Professions Code § 17203.

9 120. Plaintiffs are informed and believe and on that basis allege that
10 Defendants' conduct has been intentional and willful and in conscious disregard
11 of Plaintiffs' rights and, therefore, Plaintiffs are entitled to its attorneys' fees.

12 **REQUEST FOR RELIEF**

13 Therefore, Plaintiffs respectfully request judgment as follows:

14 1. That the Court enter a judgment that Defendants have:

15 (a) violated the rights of Plaintiffs in the VERIZON Marks, the
16 VZ Marks and the VERIZON FIOS Marks in violation of 15 U.S.C. § 1125(d);

17 (b) infringed the rights of Plaintiffs in the VERIZON Marks, the
18 VZ Marks and the VERIZON FIOS Marks in violation of 15 U.S.C. § 1114(1);

19 (c) violated the rights of Plaintiffs in the VERIZON Marks, the
20 VZ Marks and the VERIZON FIOS Marks in violation of 15 U.S.C. § 1125(a);

21 (d) violated the rights of Plaintiffs in the VERIZON Marks in
22 violation of 15 U.S.C. § 1125(c);

23 (e) infringed the rights of Plaintiffs in the VERIZON Marks, the
24 VZ Marks and the VERIZON FIOS Marks in violation of California Business and
25 Professions Code § 14320; and

26 (f) infringed the rights of Plaintiffs in the VERIZON Marks, the
27 VZ Marks, and the VERIZON FIOS Marks in violation of California Business
28 and Professions Code § 17200 and the common law;

1 2. That Defendants be ordered to transfer every domain name they own
2 which is identical or confusingly similar to the VERIZON Marks, the VZ Marks
3 or the VERIZON FIOS Marks to Plaintiff Verizon Trademark Services;

4 3. That Defendants, their agents, representatives, employees, assigns
5 and suppliers, and all persons acting in concert or privity with Defendants be
6 preliminarily and permanently enjoined from the following activities:

7 (a) Registering or using, in any manner, any Internet domain
8 name that incorporates, in whole or in part, the VERIZON Marks, the VZ Marks
9 or the VERIZON FIOS Marks, or any name, mark or designation confusingly
10 similar thereto;

11 (b) Using any of the VERIZON Marks, the VZ Marks or the
12 VERIZON FIOS Marks , or any other name, mark, designation or depiction in a
13 manner that is likely to cause confusion regarding whether Defendants are
14 affiliated or associated with or sponsored by Plaintiffs;

15 (c) Registering any Internet domain name that incorporates, in
16 whole or in part, the VERIZON Marks, the VZ Marks or the VERIZON FIOS
17 Marks, or any name, mark or designation confusingly similar thereto;

18 (d) Registering any domain name using an automated process;

19 (e) Registering any domain name without providing complete and
20 accurate contact information, including Defendants' full legal name as the
21 registrant, and not maintaining complete and accurate contact information,
22 including Defendants' full legal name as the registrant;

23 (f) Practicing trademark infringement, trademark dilution, unfair
24 competition, false designation of origin, passing off, false advertising, against
25 Plaintiffs or misappropriation of Plaintiffs' trademark rights; and

26 (g) Assisting, aiding or abetting any other person or business
27 entity in engaging in or performing any of the activities referred to in
28 subparagraphs 3(a) through 3(f) above;

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4. That Defendants be ordered to engage in corrective advertising to the extent necessary to correct any consumer confusion or misperceptions resulting from Defendants' unlawful acts complained of above;

5. That Defendants be ordered to account to Plaintiffs for, and disgorge, all profits they have derived by reason of the unlawful acts complained of above;

6. That Defendants be ordered to pay damages, and that those damages be trebled, under 15 U.S.C. § 1117;

7. That Defendants be ordered to pay statutory damages under 15 U.S.C. § 1117(d), on election by Plaintiffs, in an amount of One Hundred Thousand Dollars (\$100,000) per domain name infringement;

8. That Defendants be ordered to pay Plaintiffs' reasonable attorney fees, prejudgment interest, and costs of this action under 15 U.S.C. § 1117 and under California Business and Professions Code § 17200, and under the California common law;

9. That Defendants be ordered to file with the Court and serve upon Plaintiffs a written report under oath setting forth in detail the manner and form in which Defendants have complied with the injunction and judgment within thirty (30) days after the service of the injunction and judgment upon Defendants; and

10. That Plaintiffs be awarded such other relief as may be appropriate.

CHRISTIE, PARKER & HALE, LLP

DATED: April 14, 2008

By 
David J. Steele
Howard A. Kroll
Attorneys for Plaintiffs
VERIZON CALIFORNIA INC.
VERIZON TRADEMARK SERVICES LLC
VERIZON LICENSING COMPANY


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DEMAND FOR TRIAL BY JURY

Plaintiffs, VERIZON CALIFORNIA INC., VERIZON TRADEMARK SERVICES LLC, and VERIZON LICENSING COMPANY, hereby demand a trial by jury to decide all issues so triable in this case.

CHRISTIE, PARKER & HALE, LLP

DATED: April 14, 2008

By 

David J. Steele
Howard A. Kroll
Attorneys for Plaintiffs
VERIZON CALIFORNIA INC.
VERIZON TRADEMARK SERVICES LLC
VERIZON LICENSING COMPANY

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Audrey B. Collins and the assigned discovery Magistrate Judge is Charles Eick.

The case number on all documents filed with the Court should read as follows:

CV08 - 2463 ABC (Ex)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

David J. Steele, CA Bar No. 209797
Howard A. Kroll, CA Bar No. 100981
CHRISTIE, PARKER & HALE, LLP
3501 Jamboree Road, Suite 6000 - North Tower
Newport Beach, CA 92660
Tel.: (949) 476-0757

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Verizon California Inc.; Verizon Trademark
Services LLC; and Verizon Licensing Company,
PLAINTIFF(S)

v.

Navigation Catalyst Systems, Inc.; and
Basic Fusion, Inc.,
DEFENDANT(S).

CASE NUMBER

CV08-02463 ABC (Ex)

SUMMONS

TO: DEFENDANT(S): Navigation Catalyst Systems, Inc. and Basic Fusion, Inc.

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, David J. Steele and Howard A. Kroll, whose address is Christie, Parker & Hale, LLP, 3501 Jamboree Rd., Ste. 6000, Newport Beach, CA 92660. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

ROLLS ROYCE PASCHNA

Dated: APR 15 2008

By: _____
Deputy Clerk

(Seal of the Court) 1144

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) VERIZON CALIFORNIA INC.; VERIZON TRADEMARK SERVICES LLC; and VERIZON LICENSING COMPANY	DEFENDANTS NAVIGATION CATALYST SYSTEMS, INC.; and BASIC FUSION, INC.
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Ventura County	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) David J. Steele, SBN 209797; Howard A. Kroll, SBN 100981 CHRISTIE, PARKER & HALE, LLP 3501 Jamboree Road, Suite 6000 - North Tower Newport Beach, CA 92660 Tel. (949) 476-0757	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;">Citizen of This State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td></td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF		<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF																				
	<input type="checkbox"/> 1	<input type="checkbox"/> 1		<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No
 MONEY DEMANDED IN COMPLAINT: \$ To be determined at trial

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

15 U.S.C. § 1125(d) - Cybersquatting; 15 U.S.C. § 1114(1) - Trademark Infringement; 15 U.S.C. § 1125(a) - False Designation of Origin ; and 15 U.S.C. § 1125(c) - Dilution

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? No Yes

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number: CV08-02463 ABC (Ex)

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? No Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)
 Check here if the U.S. government, its agencies or employees is a named plaintiff.

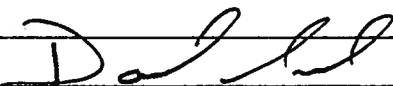
Verizon California Inc. - Ventura County
 Verizon Trademark Services LLC - Virginia
 Verizon Licensing Company - Virginia

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).
 Check here if the U.S. government, its agencies or employees is a named defendant.

Navigation Catalyst System, Inc. - Los Angeles County
 Basic Fusion, Inc. - Los Angeles County

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)
 Note: In land condemnation cases, use the location of the tract of land involved.

Ventura County, Los Angeles County, and Virginia

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date April 14, 2008

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))