

April 22, 2024

Re: Case No. D2024-1440
<aairline.online>
Written Notice

Dear Sir or Madam,

You are hereby informed that a Complaint 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") as 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") as approved by ICANN on September 28, 2013, and in effect as of July 31, 2015, and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules") in effect as of July 31, 2015.

This Written Notice is issued pursuant to paragraph 4(c) of the Rules, and does not include an actual copy of the Complaint (including any annexes), which has been duly forwarded to you by email.

The Complaint concerns the above-referenced disputed domain name, and the due date for your submission of any Response is **May 12, 2024**. Such Response, and any other case-related communications to the Center, may be submitted by email to domain.disputes@wipo.int, referring to the above case number, and copying the Complainant. Additional relevant information is below.

The **Policy** can be found at <https://www.icann.org/resources/pages/policy-2012-02-25-en>.

The **Rules** can be found at <https://www.icann.org/resources/pages/udrp-rules-2015-03-11-en>.

The **Supplemental Rules**, as well as other information concerning the resolution of domain name disputes can be found at <https://www.wipo.int/amc/en/domains/supplemental/eudrp/newrules.html>.

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

34, chemin des Colombettes
1211 Geneva 20, Switzerland
T +4122 338 82 47 F +4122 740 37 00
domain.disputes@wipo.int
www.wipo.int/amc

The Policy is incorporated by reference into your Registration Agreement with the Registrar of your domain name, 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.

Pursuant to Paragraph 4(g) of the Rules and Paragraph 4(d) of the Supplemental Rules, you have been forwarded an electronic copy of the Complaint (including any annexes) to the email address(es) in the attached Communications page.

If you would like a copy of the Complaint (including any annexes) forwarded to you at an alternate email address(es), please advise the Center of this as soon as possible. Such request may be sent by email to the Center at domain.disputes@wipo.int, referring to the above case number. Any corrections or updates to the Respondent's contact information during the remaining Pendency of the UDRP proceedings shall be communicated to the Center in accordance with Rules, Paragraphs 5(c)(ii) and 5(c)(iii).

The known name and contact details of the Complainant can be found on the attached Communications page. A copy of the Complaint has also been sent to the Registrar with which the domain name that is the subject of the Complaint is registered.

The date of formal commencement for this UDRP proceeding is **April 22, 2024**.

Under the Rules, you have 20 calendar days from this date to submit a Response. As such, the due date for your submission of a Response is **May 12, 2024**.

Instead of submitting a formal Response, you may consent to the remedy requested by the Complainant and agree to transfer the disputed domain name.

Your Response may be submitted to the Center (copied to the Complainant) using the following email address: domain.disputes@wipo.int. Any request to the Center for an extension pursuant to Paragraphs 5(b) and 5(e) of the Rules, may be submitted to the same email address. The Respondent may expressly request an additional four (4) calendar days in which to respond to the Complaint, and the Center shall automatically grant the extension in accordance with Rules, Paragraph 5(b). This extension does not preclude any additional extensions that may be given further to Paragraph 5(e) of the Rules. You may represent yourself or authorize someone to represent you in the administrative proceeding, which may include your seeking the assistance of legal counsel.

If your Response is timely submitted by the specified due date, the Center will duly acknowledge receipt. In the absence of any submitted Response (or evidence of its transmission), the Center will typically forward a notice of respondent default. In either case, the Center will proceed to appoint an Administrative Panel to review the facts and to decide the case. Such Panel would on appointment have discretion to rule on admissibility of any belated Response if received.

The Administrative Panel may consist of one or three members. If the Complainant has elected a single-member Panel, and you wish to elect a three-member Panel to hear the case, you will be responsible for paying half of the administrative fee for a three-member Panel dispute: USD 2,000. Otherwise, the administrative fee will be paid solely by the Complainant.

The Administrative Panel will have typically 14 days from the date of its appointment to issue a decision in the case, which is thereafter notified by the Center to the parties and Registrar. Should the decision require that the disputed domain name be either transferred or cancelled, the Registrar will notify all parties concerned of the date that the decision will be implemented if the

Registrar does not receive notification and the required documentation from you in accordance with Paragraph 4(k) of the Policy. The Center will then post the decision on a publicly accessible website, unless directed otherwise by the Administrative Panel.

The Center, which is a neutral dispute resolution provider, has appointed a Case Manager who is in charge of administering your case. The Case Manager's details appear below. Please note that, while the Case Manager is at your disposal to answer questions relating to such matters as filing requirements and applicable procedure, the Case Manager is not the decision-maker on the merits of this case, and cannot provide you with legal advice or make any representations to the Administrative Panel or otherwise on your behalf.

Additional information about the process, including the Written Notice requirement, is available in the Center's Notification of Complaint and Commencement of Administrative Proceedings document as sent to you by email, with further information and additional resources available on the Center's website at <http://www.wipo.int/amc/en/domains>.

Case Manager: Linzi C.

Address: WIPO Arbitration and Mediation Center
34 chemin des Colombettes
1211 Geneva 20, Switzerland
Telephone: +41 22 338 8247
Fax No.: +41 22 740 3700

Email Address: domain.disputes@wipo.int

Yours sincerely,

Linzi C.
Case Manager

COMMUNICATIONS

The Notification of Complaint and Commencement of Administrative Proceedings is being communicated to the Respondent (including the domain name registrant, administrative contact, technical contact, and billing contact, as required by Paragraph 2(a) of the Rules) in accordance with the following contact details:

Cater and Merger

Suite 5, 47 Lake chad crescent Maitama, Abuja Nigeria / Ailia Future Business Centre London Road, Peterborough

Abuja

Federal Capital Territory / P

901101

Nigeria

2347030842031 (Office telephone)

info@caterandmergerconsult.com

webmaster@aairline.online

89ee640d96d64720b715dc4d4e2880a1.protect@withheldforprivacy.com

postmaster@aairline.online

By the following method:

☒ [X] Email (Complaint with attachments)

Please note that Written Notice of this dispute has also been sent to the above contact details by the following method:

☒ [X] Post/Courier (A facsimile number is not available)

☐ [] Facsimile

The Notification of Complaint and Commencement of Administrative Proceedings is being copied to the Complainant by email in accordance with the following contact details:

American Airlines, Inc.

United States of America

Represented by:

Marc H. Trachtenberg

Greenberg Traurig, LLP

77 W. Wacker Drive

Chicago, Illinois 60601

United States of America

13124561020;13124765110 (Office telephone)

13128990390 (Office FAX)

trachtenbergm@gtlaw.com, carrm@gtlaw.com

A copy has also been communicated by email to the Registrar listed below:

NameCheap, Inc.