

**Before the:
WORLD INTELLECTUAL PROPERTY ORGANIZATION
ARBITRATION AND MEDIATION CENTER**

DONAL J. TRUMP,

Complainant,

v.

SCOTT STEPHENS,

Respondent.

NOTICE OF LITIGATION

Case No. D2015-0478

Disputed Domain:

TRUMPESTATES.COM

Respondent SCOTT STEPHENS (“Respondent”), by and through his attorney at law of record BRIAN L. PONDER, ESQ. of the law firm BRIAN PONDER LLP, provides notice in accordance with Paragraph 4(k) the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”) that Respondent has commenced a lawsuit against the Complainant in a jurisdiction to which the Complainant has submitted under Paragraph 3(b)(xiii) of the Rules of Procedure. Respondent’s Notice herein is within the ten (10) business day period of the Panel’s decision dated May 8, 2015, that was transmitted to Respondent on May 15, 2015. Further, Respondent attaches hereto a true and correct copy of Respondent’s Complaint against Complainant, file-stamped by the clerk of the court on 04/19/15 under Case No. 1:15-cv-02217.

Therefore, pursuant to Paragraph 4(k) of the Rules, Respondent respectfully requests that the Administrative Panel’s decision not be implemented. Respondent respectfully requests confirmation that the Administrative Panel’s decision will not be implemented as per the Rules.

Respectfully submitted,

Dated: New York, New York
May 15, 2015

s/ Brian L. Ponder
BRIAN L. PONDER, ESQ.
BRIAN PONDER LLP

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New York, New York 10166
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Attorney for Respondent SCOTT STEPHENS

CERTIFICATE OF SERVICE

I certify under penalty of perjury that a true and correct copy of the foregoing document has been submitted via reply all email to Domain.Disputes@wipo.int, which includes emails to all interested parties or their representatives such as the Complainant, Respondent, and Registrar.

Dated: New York, New York
May 15, 2015

s/ Brian L. Ponder
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