

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ESTATE OF UZI NISSAN,

Plaintiff,

v.

NISSAN.COM and NISSAN.NET, Internet
domain names,

Defendants.

Civil Action No. 1:23-cv-00821-PTG-IDD

FIRST AMENDED COMPLAINT

Plaintiff the Estate of Uzi Nissan (“Plaintiff”), by counsel, alleges as follows for its First Amended Complaint against Defendants:

NATURE OF THE SUIT

1. Uzi Nissan was a visionary entrepreneur who was always thinking of new ideas for businesses and for ways to help his community and those around him. Mr. Nissan was a gracious and generous man, always helping people in any possible way and going above and beyond to make others happy and comfortable.

2. Mr. Nissan acquired the NISSAN.COM and NISSAN.NET domain names for use in relation to his retail computer business in 1994 and 1996, and famously used, promoted, and defended the domains from the time of acquisition through the time of his death.

3. Plaintiff, Mr. Nissan’s estate, is his successor in interest and the rightful owner of the NISSAN.COM and NISSAN.NET domain names.

4. At some point following Mr. Nissan’s death, a thief gained unauthorized access to Mr. Nissan’s domain name management accounts and stole the domain names. Plaintiff now

asserts an *in rem* claim under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), arising from the unauthorized transfer and theft of the NISSAN.COM and NISSAN.NET domain names (the “Defendant Domain Names”).

5. Plaintiff seeks injunctive and other equitable relief as a result of the unauthorized transfer of the Defendant Domain Names from Plaintiff, which has disabled Plaintiff’s control of the Defendant Domain Names causing irreparable injury to Plaintiff.

PARTIES

6. Plaintiff the Estate of Uzi Nissan was, and is, the rightful owner of the Defendant Domain Names after having first registered the Defendant Domain Names in 1994 and 1996.

7. Defendant NISSAN.COM is an Internet domain name that has been improperly transferred to another registrant with the domain name registrar GKG.NET. A copy of the current domain name registration record for NISSAN.COM is attached as Exhibit A, and an archived domain name registration record identifying Plaintiff as the registrant of NISSAN.COM prior to the theft is attached as Exhibit B.

8. Defendant NISSAN.NET is an Internet domain name that has been improperly transferred to another registrant with the domain name registrar GKG.NET. A copy of the current domain name registration record for NISSAN.NET is attached as Exhibit C, and an archived domain name registration record identifying Plaintiff as the registrant of NISSAN.NET prior to the theft is attached as Exhibit D.

JURISDICTION, VENUE AND JOINDER

9. This action arises under the Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

10. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§

1331 and 1338(a).

11. This Court has *in rem* jurisdiction pursuant to 15 U.S.C. § 1125(d)(2)(A).

12. *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A) because the current registration records for the Defendant Domain Names do not identify the parties in possession of the Defendant Domain Names and Plaintiff is not able to obtain personal jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A). Plaintiff has provided notice to the Defendants of his intent to proceed *in rem* pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa).

13. The Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(3) and (4), states that the *in rem* action, jurisdiction, and remedies created by the statute are “in addition to any other civil action or remedy otherwise applicable” and “in addition to any other jurisdiction that otherwise exists, whether in rem or in personam.”

14. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the registry operator of the .COM and .NET domain registries, VeriSign, Inc., is situated in this judicial district, and the Defendant Domain Names are .COM and .NET domain names.

15. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the claim set forth herein arises out of the same series of transactions and the same questions of law are common to all of the Defendants.

PLAINTIFF’S RIGHTS

16. Uzi Nissan was an internationally known entrepreneur, computer salesman, and a tireless consumer advocate for over 20 years.

17. Mr. Nissan immigrated to the United States in the 1970s and started his first business shortly after arriving in America. In 1980, Mr. Nissan created Nissan International, a

wholesale computer and heavy equipment export company.

18. In 1991, Mr. Nissan created Nissan Computer Corporation (“NCC”) as its sole shareholder to sell retail computer goods and services in Raleigh, North Carolina and licensed NCC the use of his name.

19. Mr. Nissan was also an early Internet pioneer. In 1994 and 1996, pursuant to its license from Mr. Nissan, NCC registered the NISSAN.COM and NISSAN.NET domain names as “Nissan Computer Corp. (Licensee)” and “Uzi Nissan (Licensor)” to advertise his computer business.

20. After registration, the sites were configured to prominently display the Nissan name in connection with Mr. Nissan’s computer business.

Nissan.com



Nissan.net



21. In August 1999, the NISSAN.COM and NISSAN.NET domain names became the subject of a highly publicized legal battle with Nissan Motor Company which lasted approximately eight years and ultimately vindicated Mr. Nissan’s ownership and usage rights in the NISSAN.COM and NISSAN.NET domain names.

22. In 2006, and as a result of the lawsuit, Mr. Nissan also began using the site to promote public advocacy related to Internet free speech issues, in addition to continuing to operate his computer business and sell advertisements on the sites.

Nissan.com



Nissan.net



23. The NISSAN.COM and NISSAN.NET sites prominently used Mr. Nissan’s name on the banner for the websites. The sites also displayed the NCC logo consisting of the word “Nissan” on a horizontal axis, and the word “Computer” on a vertical axis, at the left and right top corners of the website.

24. As the reach of the Internet continued to grow, the number of visitors during this time period was substantial. For example, in 2007, web traffic metrics showed that approximately 500,000 unique visitors visited the NISSAN.COM and NISSAN.NET websites on a monthly basis.

25. Throughout the 2010s until the domain names were stolen, Mr. Nissan and his estate continued to use the NISSAN.COM and NISSAN.NET¹ domains to sell computer products, promote the Nissan names prominently on the site, sell advertisements, and raise awareness about important internet free speech issues.

¹ In 2010, the NISSAN.NET domain was configured to redirect all traffic to NISSAN.COM.

Nissan.com

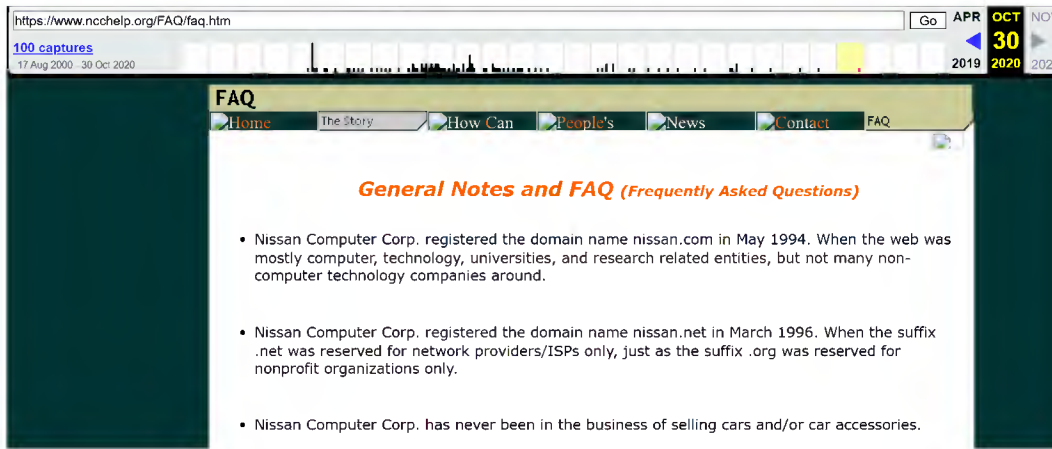


26. Mr. Nissan also expended significant amounts of money to market and maintain ownership of the NISSAN.COM and NISSAN.NET domains. For example, Mr. Nissan invested at least \$3 million into legal fees to maintain ownership of the sites. Mr. Nissan also owned and operated several other domains used to promote the NISSAN.COM and NISSAN.NET domains and raise awareness about Mr. Nissan's public advocacy efforts, including ncchelp.org² and digest.com.³

² Following Mr. Nissan's death, the registration for ncchelp.org was not renewed and was later registered by an unknown individual in January of 2023 and configured to redirect to a site selling computers.

³ Similar to the NISSAN.COM and NISSAN.NET domains, digest.com was stolen from Plaintiff, but is not the subject of the present action.

ncchelp.org



digest.com



27. In connection with the NISSAN.COM and NISSAN.NET domains, Mr. Nissan has been the subject of extensive media coverage, in publications like the *Los Angeles Times*, *Salon*, *Wired*, *USA Today*, *Associated Press*, *CNET*, and *Jalopnik* and interviews on news networks like *CNBC*.

28. Consumers continually looked toward Mr. Nissan for his computer services and his consumer advocacy efforts as demonstrated by the 500 pages of comments from individuals voicing their support for Mr. Nissan that appeared on the NISSAN.COM and NISSAN.NET

domain names until disabled by an individual of unknown identity (“John Doe”).

29. Mr. Nissan, and after his death Plaintiff, used the NISSAN.COM and NISSAN.NET domain names for almost 30 years in connection with the NISSAN.COM and NISSAN.NET websites to advertise computer services, promote his public advocacy efforts related to Internet free speech issues, and for business and personal email communications using @NISSAN.COM and @NISSAN.NET addresses to communicate with customers of NCC, supporters of Mr. Nissan’s public advocacy, family, friends, to open and use various online accounts, and/or to promote and provide ancillary services (the “NISSAN.COM and NISSAN.NET Marks”).

30. Following Mr. Nissan’s death, Plaintiff is now the lawful owner of the Defendant Domain Names and all the associated rights as shown by the historical WhoIs records for the Defendant Domain Names and widely publicized information. None of the domain name registrations had expired at the time of the theft.

31. Plaintiff is entitled to common law trademark protection in the NISSAN.COM and NISSAN.NET Marks by virtue of use of the marks in U.S. commerce for almost 50 years.

32. The unauthorized transfer and subsequent misuse of the Defendant Domain Names further demonstrates that the NISSAN.COM and NISSAN.NET Marks are entitled to trademark protection.

33. Despite the Defendant Domain Names being stolen, the domains now direct consumers to an image of the prior NISSAN.COM and NISSAN.NET websites in a possible attempt to avoid the appearance of impropriety.

UNLAWFUL TRANSFER AND REGISTRATION OF THE DOMAIN NAMES

34. The Verizon 2020 Data Breach Investigations Report reported that there were over

108,069 security breaches in 2019—with 100,000+ of the breaches involving the unauthorized use of an individual’s login credentials to obtain unlawful access to a secured account.

35. Plaintiff’s claim in the present case involves one of the most recent iterations of such computer hacking actions—colloquially referred to as “domain name theft.”

36. Plaintiff and Mr. Nissan have maintained domain name management accounts with GKG.NET since first acquiring the Defendant Domain Names almost 30 years ago.

37. Upon Mr. Nissan’s death, GKG.NET was advised of Mr. Nissan’s death and the creation of Plaintiff.

38. Upon review of Plaintiff’s domain name management accounts with GKG.NET, Plaintiff learned that the Plaintiff no longer had access to the domain name management accounts for the Defendant Domain Names at GKG.NET due to actions by John Doe that were performed without Plaintiff’s knowledge or permission.

39. Plaintiff never received notification of any changes by GKG.NET to the Defendant Domain Names or the associated registrar account. Such notification is required by ICANN.

40. On information and belief, John Doe obtained unauthorized access to Plaintiff’s domain registrar account and manipulated the computer records to obtain the transfer of the Defendant Domain Names through an "account transfer" within GKG.NET or other surreptitious manner intended to avoid detection by Plaintiff.

41. On information and belief, either John Doe prevented Plaintiff from receiving electronic communications seeking approval for the transfer of the Defendant Domain Names or GKG.NET did not send any such electronic communications.

42. When the Defendant Domain Names were stolen by John Doe without authorization, the technical settings for the Defendant Domain Names were changed thereby

disabling Plaintiff's ability to control the domain names and associated email accounts.

43. Plaintiff contacted GKG.NET upon learning of the theft of the Defendant Domain Names and informed them of unauthorized transfers of the Defendant Domain Names.

44. GKG.NET did not deny, dispute, or question that the Defendant Domain Names were transferred without authorization, but GKG.NET has been unwilling to secure the return of the domain names to Plaintiff's control.

45. Plaintiff has been made aware of communications from a person claiming to be in possession of the Defendant Domain Names who impersonated family members of Mr. Nissan and sought to sell the domain names.

46. The registration and use of the Defendant Domain Names by John Doe are without authorization from Plaintiff.

47. The Defendant Domain Names do not reflect the trademark or intellectual property rights of John Doe.

48. On information and belief, the Defendant Domain Names do not reflect the legal name of John Doe.

49. John Doe has not engaged in bona fide noncommercial or fair use of Plaintiff's NISSAN.COM and NISSAN.NET Marks in a website accessible under the Defendant Domain Names.

50. John Doe provided material and misleading false contact information in the domain name registrations in that the current registration records still list Plaintiff's registration information.

51. John Doe transferred the Defendant Domain Names without authorization from Plaintiff and thereby acquired domain names which John Doe knew were identical to, and

reflective of, Plaintiff's NISSAN.COM and NISSAN.NET Marks.

FIRST CLAIM FOR RELIEF (IN REM)
Violation of the Anticybersquatting Consumer Protection Act

52. Plaintiff repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

53. Plaintiff's NISSAN.COM and NISSAN.NET Marks are distinctive and were distinctive prior to the time the Defendant Domain Names were transferred away from Plaintiff without authorization and thereby unlawfully registered to John Doe.

54. The aforesaid acts by John Doe constitute registration, trafficking, and/or use of a domain name that is identical to Plaintiff's NISSAN.COM and NISSAN.NET Marks, with bad faith intent to profit therefrom.

55. The aforesaid acts constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

56. The aforesaid acts have caused, and are causing, great and irreparable harm to Plaintiff and the public. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i). Plaintiff is entitled to an order changing the registrar and registrant for Defendant NISSAN.COM and NISSAN.NET returning control of the domains back to Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests of this Court:

1. That judgment be entered in favor of Plaintiff on his *in rem* claim under the Anticybersquatting Consumer Protection Act.

2. That the Court order the Defendant Domain Names be returned to Plaintiff through VeriSign's change of the current domain name registrar to Plaintiff's registrar of choice,

GoDaddy.com, LLC, and by GoDaddy's change of the registrants to Plaintiff.

3. That the Court order an award of costs and reasonable attorney's fees incurred by Plaintiff in connection with this action pursuant to 15 U.S.C. § 1117(a); and

4. That the Court order an award to Plaintiff of such other and further relief as the Court may deem just and proper.

Dated: October 17, 2023

By: /s/ Attison L. Barnes, III

Attison L. Barnes, III (VA Bar No. 30458)

David E. Weslow (*pro hac vice*)

Spencer Brooks (*pro hac vice*)

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Counsel for Plaintiff

Estate of Uzi Nissan

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on October 17, 2023, I electronically filed the foregoing by using the CM/ECF system. I also notified the registrant(s) of the domain names through the contact information provided by the registrant to the registrar for the domain names.

/s/ Attison L. Barnes, III

Attison L. Barnes, III (VA Bar No. 30458)

WILEY REIN LLP

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Washington, DC 20036

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Fax: (202) 719-7049

abarnes@wiley.law

Counsel for Plaintiff

Estate of Uzi Nissan

EXHIBIT A

The screenshot shows a web browser window with the address bar displaying "https://gkg.net/whois". The page header includes the GKG logo, a search bar with the text "whatever-you-want.com", and a "Search" button. There is also a login section with fields for "username" and "password" and a "Login" button. A support section provides the phone number "877-695-1790", the email "support@gkg.net", and a "Reset Password" link. A navigation menu contains links for "Domains", "Hosting", "Email", "Support", "Contact Us", "My Account", and "Español".

Whois Results

Response for query "nissan.com"

```
Domain Name: NISSAN.COM
Registry Domain ID: 2586372_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2023-10-12T00:10:31.0Z
Creation Date: 1994-05-03T23:00:00.0Z
Registrar Registration Expiration Date: 2029-05-04T23:00:00.0Z
Registrar: GKG.NET, INC.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registrant Organization: Nissan Computer Corp. (Licensee)
Registrant State/Province: NC
Registrant Country: US
Registrant Email: https://www.gkg.net/apps/contact-domain/nissan.com
Admin Email: https://www.gkg.net/apps/contact-domain/nissan.com
Tech Email: https://www.gkg.net/apps/contact-domain/nissan.com
Name Server: NS1.NISSAN.NET
Name Server: NS3.NISSAN.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-10-16T14:19:04.0Z <<<
```

For more information on Whois status codes, please visit <https://icann.org/epp>

The Data in GKG.NET's WHOIS database is provided by GKG.NET for information purposes, and to assist persons in obtaining information about or related to a domain name registration record. GKG.NET does not guarantee its accuracy. By submitting a WHOIS query, you agree that you will use this Data only for lawful purposes and that, under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail (spam); or (2) enable high volume, automated, electronic processes that apply to GKG.NET (or its systems). GKG.NET reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

4:16 PM
10/16/2023

EXHIBIT B

Archived on April 13, 2022:

Show differences



```
Domain Name: NISSAN.COM
Registry Domain ID: 2586372_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2019-01-18T15:09:11Z
Creation Date: 1994-05-04T04:00:00Z
Registry Expiry Date: 2024-05-05T04:00:00Z
Registrar: GKG.Net, Inc.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Name Server: NS1.NISSAN.NET
Name Server: NS3.NISSAN.NET
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
```

```
Domain Name: NISSAN.COM
Registry Domain ID: 2586372_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2019-01-18T09:09:11.0Z
Creation Date: 1994-05-03T23:00:00.0Z
Registrar Registration Expiration Date: 2024-05-04T23:00:00.0Z
Registrar: GKG.NET, INC.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Registrant Organization: Nissan Computer Corp. (Licensee)
Registrant State/Province: NC
Registrant Country: US
Registrant Email: https://www.gkg.net/apps/contact-domain/nissan.com
Admin Email: https://www.gkg.net/apps/contact-domain/nissan.com
Tech Email: https://www.gkg.net/apps/contact-domain/nissan.com
Name Server: NS1.NISSAN.NET
Name Server: NS3.NISSAN.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
```

EXHIBIT C

WHOIS Domain Name Search x +

← → ↻ 🏠 🔒 https://gkg.net/whois 🔍 🔍 🔗 ☆ 🌐



Support:
877-695-1790
support@gkg.net
[Reset Password](#)

Domains ▾ Hosting ▾ Email ▾ Support ▾ Contact Us ▾ My Account ▾ Español

Whois Results

Response for query "nissan.net"

```
Domain Name: NISSAN.NET
Registry Domain ID: 2907258_DOMAIN_NET-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2023-10-12T00:12:20.0Z
Creation Date: 1996-03-16T23:00:00.0Z
Registrar Registration Expiration Date: 2029-03-17T23:00:00.0Z
Registrar: GKG.NET, INC.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registrant Organization: Nissan Computer Corp (Licensee)
Registrant State/Province: NC
Registrant Country: US
Registrant Email: https://www.gkg.net/apps/contact-domain/nissan.net
Admin Email: https://www.gkg.net/apps/contact-domain/nissan.net
Tech Email: https://www.gkg.net/apps/contact-domain/nissan.net
Name Server: NS1.NISSAN.NET
Name Server: NS3.NISSAN.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-10-16T15:18:38.0Z <<<
```

For more information on Whois status codes, please visit <https://icann.org/epp>

The Data in GKG.NET's WHOIS database is provided by GKG.NET for information purposes, and to assist persons in obtaining information about or related to a domain name registration record. GKG.NET does not guarantee its accuracy. By submitting a WHOIS query, you agree that you will use this Data only for lawful purposes and that, under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail (spam); or (2) enable high volume, automated, electronic processes that apply to GKG.NET (or its systems). GKG.NET reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

4:18 PM
10/16/2023

EXHIBIT D

Archived on June 23, 2023:

Show differences

```

Domain Name: NISSAN.NET
Registry Domain ID: 2907258_DOMAIN_NET-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2023-04-26T18:29:44Z
Creation Date: 1996-03-17T05:00:00Z
Registry Expiry Date: 2029-03-18T04:00:00Z
Registrar: GKG.Net, Inc.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Name Server: NS1.INMOTIONHOSTING.COM
Name Server: NS2.INMOTIONHOSTING.COM
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

```

```

Domain Name: NISSAN.NET
Registry Domain ID: 2907258_DOMAIN_NET-VRSN
Registrar WHOIS Server: whois.gkg.net
Registrar URL: http://www.gkg.net
Updated Date: 2023-04-26T13:29:44.0Z
Creation Date: 1996-03-16T23:00:00.0Z
Registrar Registration Expiration Date: 2029-03-17T23:00:00.0Z
Registrar: GKG.NET, INC.
Registrar IANA ID: 93
Registrar Abuse Contact Email: abuse@gkg.net
Registrar Abuse Contact Phone: +1.8776951790
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registrant Organization: Nissan Computer Corp (Licensee)
Registrant State/Province: NC
Registrant Country: US
Registrant Email: https://www.gkg.net/apps/contact-domain/nissan.net
Admin Email: https://www.gkg.net/apps/contact-domain/nissan.net
Tech Email: https://www.gkg.net/apps/contact-domain/nissan.net
Name Server: NS1.INMOTIONHOSTING.COM
Name Server: NS2.INMOTIONHOSTING.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

```

Recent Nameserver History

Recent Registrar History

[inmotionhosting.com](#)

[Gkg.net](#)