



February 16, 2011

**Via Federal Express and Email**

Domains by Proxy, Inc.  
15111 N. Hayden Rd., Ste 160, PMB 353  
Scottsdale, Arizona 85260  
United States

Re: Infringement of Trademark Chatroulette™

Dear Domains by Proxy:

This firm represents Chatroulette, Inc., owner of the trademark Chatroulette™. The Chatroulette mark is the subject of United States Trademark Application Serial No. 85/214,314 for telecommunication and computer services, including on-line dating, on-line video introduction services, on-line video communications, video chat services, on-line computer database enabling strangers to meet and communicate real-time, and a social networking website for entertainment purposes.

Chatroulette, Inc. objects to the registration and use of the following domain names, all of which are shown in WHOIS records as handled by Domains by Proxy, Inc.:

chatroulettehof.com  
chatroulettehalloffame.com  
chatroulette2011.com  
chatroulettedesktop.com  
chatroulettevideos.com  
chatroulettepredators.com  
chatroulette-blog.com  
chatrouletteofsex.com  
chatroulottenetwork.com

We demand that the registrants stop using the domain names and arrange for the transfer of the registration of such domain names to Chatroulette, Inc.

Chatroulette, Inc. has used the Chatroulette mark for the identified services since at least as early as 2009. Chatroulette, Inc.'s use of the mark is prominently promoted on its website at [www.chatroulette.com](http://www.chatroulette.com) and in numerous other places. An example of Chatroulette, Inc.'s use of its Chatroulette mark is enclosed for your reference. All of the domain names identified in this letter were registered after 2009 and use Chatroulette, Inc.'s mark without its authorization.

The registrants' adoption of these domain names appears to be cybersquatting. These domain names include a name that is identical or confusingly similar to Chatroulette, Inc.'s trademark Chatroulette; the registrants have no legitimate interest in the Chatroulette name; and the domain names were registered and are being used in bad faith to attract Internet users for commercial gain.

Further, the registrants' unauthorized use of the above domain names and, where applicable, the registrants' use of "Chatroulette," "chatroulette," "ChatRoulette," "Chat Roulette," or other variations, on the websites located at the domain names, infringes Chatroulette, Inc.'s trademark rights by creating a likelihood of consumer confusion, mistake or deception, and falsely implies an endorsement by or a preferred relationship with Chatroulette, Inc.

We demand that the registrants promptly transfer the above mentioned domain names to Chatroulette, Inc., and remove and cease use of any and all references to "Chatroulette," "chatroulette," "ChatRoulette," "Chat roulette," "Chat Roulette," "chatroulette.com," "Roulette Chat," and other variations on the above mentioned websites or in connection with any other domain names. This includes without limitation withdrawing all online posted materials containing the mark, destroying all printed materials containing the mark, and any other steps to insure that the registrants respect the trademark rights of Chatroulette, Inc. and avoid the improper use of its mark Chatroulette.

Please contact me within seven days from the date of this letter to confirm that the infringing uses have been removed from the websites and to arrange for assignment of the domain names to Chatroulette, Inc. If we do not hear from you within this time frame, our client is prepared to take appropriate steps to protect its valuable rights.

This letter shall not waive or otherwise prejudice any of Chatroulette, Inc.'s legal rights or remedies.

Sincerely,

SNR Denton US LLP



Belinda Luu

Enclosure.



## Attachment

