

Date		
WIPO Center's Case Number		
RESPONSE regarding the Alternative Dispute Resolution for the disputed domain name/s:		
<		>.se

Complete the Model Response for submission and send it attached to an email to: domain.disputes@wipo.int. For queries, kindly call +41 (0)22 338 8247 or send an email to: domain.info@wipo.int. By submitting this response, the Domain Holder accepts The Swedish Internet Foundation's privacy policy for alternative dispute resolution proceedings (ADR).

1. FACTUAL GROUNDS

1.1 The Domain Holder

Domain Holder's name/company	
Domain Holder's personal ID number/company number	
Domain Holder's postal address	
Domain Holder's country	Domain Holder's phone number (<i>incl. area code</i>)
Domain Holder's email address	

1.2 Representative of the Domain Holder (when applicable)

Representative's name/company	
Representative's postal address	
Representative's country	Representative's phone number
Representative's email address	

1.3 The Petitioner

Petitioner's name/company	
Petitioner's personal ID number/company number	
Petitioner's VAT-ID no. <i>*(required for all companies within the European Union, except Swedish companies)</i>	
Petitioner's postal address	
Petitioner's country	Petitioner's phone number <i>(incl. area code)</i>
Petitioner's email address	

1.4 Representative of the Petitioner (when applicable)

Representative's name/company	
Representative's postal address	
Representative's country	Representative's phone number
Representative's email address	

2. ARBITRATOR *The Domain Holder is required to tick only one of the below boxes:*

The Petitioner has elected to have the dispute decided by **one arbitrator**, and the Domain Holder accepts that the dispute be decided by one arbitrator.

The Petitioner has elected to have the dispute decided by **three arbitrators**, and the Domain Holder accepts that the dispute is decided by three arbitrators and selects:

_____ **as arbitrator(s).**

*The Domain Holder may choose one of the three arbitrators. The names of the nominees (up to three nominees) may be taken from the Center's list of .SE WIPO Domain Name arbitrators and which is published at the following website,
<https://www.wipo.int/amc/en/domains/panel/panelists.jsp?code=seDRP>*

The Petitioner has elected to have the dispute decided by one arbitrator. The Domain Holder elects to have the dispute decided by three arbitrators and hereby selects:

_____ **as arbitrator(s).**

*The Domain Holder may choose one of the three arbitrators. The names of the nominees (up to three nominees) may be taken from the Center's list of .SE WIPO Domain Name arbitrators and which is published at the following website,
<https://www.wipo.int/amc/en/domains/panel/panelists.jsp?code=seDRP>*

If the Domain Holder elects to have the dispute decided by three arbitrators,

a fee of SEK _____ (amount),

has on _____ (date) been paid to

The Swedish Internet Foundation (through deposit / payment on / via bank account / bank Giro / credit card) in accordance with The Swedish Internet Foundation's instructions,
<https://internetstiftelsen.se/en/domains/dispute-resolution/dispute-resolution-for-se/costs/>
(more information on application fees and cost for ADR are available on the website, link above.).

*An eventual partial refund should be transferred to the Domain Holder under certain circumstances, see further information on The Swedish Internet Foundation's website.
The Swedish Internet Foundation will contact the Domain Holder in such cases.*

3. LEGAL GROUNDS

3.1 Claim

The Domain Holder *(please tick the appropriate box)*

consents

objects

to the claim requested by the Petitioner.

3.2 Facts and legal grounds invoked to contest the petition *(include appendices as necessary)*

The Domain Holder hereby responds to the statements and allegations in the petition:

3.2.1 Whether the domain name is identical or similar to a right¹ which is legally recognized in Sweden and to which the Petitioner can prove its rights

3.2.2 Whether the domain name has been registered or used in bad faith

3.2.3 Whether the Domain Holder has rights or justified interest in the domain name

¹ According to Paragraph 7.2 of the .SE Policy, a right is “a trade symbol (trademark or service mark); a trade name or secondary name; a surname; an artist’s name (if the name is not associated with someone who deceased a long time ago); a title of another party’s copyrighted literary or artistic work; a name that is protected by the Regulation concerning Certain Official Designations (1976:100); or the name of a government authority that is listed in the registry that Statistics Sweden must maintain under the Swedish Code of Statutes SFS 2007:755 (Government Agencies Register Ordinance), or its generally accepted abbreviation”.

3.3 Evidence *(if you need more space, include appendices as necessary)*

3.4 Appendix *(if you need more space, include appendices as necessary)*

Date and Location	Signature
Function of Authorized Signatory	Name/Clarification of signature