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SARL au capital de 388 400 €

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Code NAF : 6910Z

TVA : FR 30 453 207 383

To the registrant of the domain names

<novotel.live>, <novotel.store>,

<novotel.fun>, <novotel.link>,

<novotel.tech>, <novotel.site>,

<novotel.space>, <novotel.online>,

<novotel.top> and <novotel.shop>

Paris, February 9, 2022

Via email only

To: mijingji@qq.com

Re: Domain names <novotel.live>, <novotel.store>, <novotel.fun>, <novotel.link>, <novotel.tech>, <novotel.site>, <novotel.space>, <novotel.online>, <novotel.top> and <novotel.shop>

O/Ref:F1667OPND2918/EH/LHU

Dear Sirs,

We represent the French Company Accor, whose registered office is located at 82 rue Henri Farman, 92130 Issy-les-Moulineaux, France.

Founded in 1967, Accor is today the world leader in economic and mid-scale hotels, and a major player in upscale and luxury hospitality services. Accor operates more than 4,100 hotels in 95 countries with over 570,000 rooms, under more than 20 different brands including RAFFLES, SOFITEL, ONEFINESTAY, FAIRMONT, MGALLERY, PULLMAN, SWISSOTEL, GRAND MERCURE, NOVOTEL, MAMA SHELTER, MERCURE and IBIS.

Accor owns numerous trademarks NOVOTEL around the world, which are very well-known especially in the field of hospitality services.

Our client has become aware of the registration and use of the ten following domain names: <novotel.live>, <novotel.store>, <novotel.fun>, <novotel.link>, <novotel.tech>, <novotel.site>, <novotel.space>, <novotel.online>, <novotel.top> and <novotel.shop>. These domain names reproduces entirely our client's trademark NOVOTEL and associate it with the

generic extensions <.live>, <.store>, <.fun>, <.link>, <.tech>, <.site>, <.space>, <.online>, <.top> and <.shop>, which do not prevent any likelihood of confusion. On the contrary, the composition of these domain names increase the likelihood of confusion with the well-known trademark “NOVOTEL” since Internet users may be led to believe that these domain names are endorsed by our client or will direct them to our client’s official websites.

All of these domain names resolve to Chinese websites which reproduce the name of our client and the term “HOTEL”, that takes part of our client’s field of activity, as below:



Our client has never granted you any authorization to use its trademark NOVOTEL and to register the domain names <novotel.live>, <novotel.store>, <novotel.fun>, <novotel.link>, <novotel.tech>, <novotel.site>, <novotel.space>, <novotel.online>, <novotel.top> and <novotel.shop>.

Moreover, the Arbitration and Mediation Center of the World Intellectual Property Organization already ordered the transfer to our client of the domain names <novotel.fun>, <novotel.link>, <novotel.top>, <novotel.store>, <novotel.vip> and <novotel.work> that you owned in a previous dispute, on May 2, 2018 (**Annex 1**).

Therefore, the registration of said domain names appears to constitute violation of the well-known trademark NOVOTEL and free riding.

Consequently, and without prejudice to any damages that could be claimed, we request that you:

- **Immediately cease the use of these domain names;**
- **Transfer these domain names to our client free of charge;**

- Undertake in writing, and on letterhead, not to use the trademark NOVOTEL under any form and *inter alia* as trademark, company name, business name, trade sign or domain name without prior written authorization.

Unless you comply with our requests in writing within the next 8 (eight) days, our client will take all necessary measures to put an end to this infringement, including legal proceedings.

We remain at the disposal of your legal advisor.

Yours faithfully,



Nathalie Dreyfus