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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MGM MIRAGE OPERATIONS, INC., a
Nevada corporation,

Plaintiff,

v.

ODED KEINAN, an individual, and TRAFFIC
LABEL LIMITED, an unknown business entity;

Defendants.

CASE NO.

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

- (1) Cybersquatting
under 15 U.S.C. § 1125(d)
- (2) Trademark Infringement
under 15 U.S.C. § 1114
- (3) Unfair Competition
under 15 U.S.C. § 1125(a)
- (4) Trademark Dilution
under 15 U.S.C. § 1125(c)
- (5) State Trademark Infringement
under N.R.S. § 600.420
- (6) State Trademark Dilution
under N.R.S. § 600.435
- (7) Common Law Trademark Infringement
- (8) Deceptive Trade Practices
under N.R.S. § 598.0903, et seq.
- (9) Intentional Interference with
Prospective Economic Advantage

For its complaint, MGM MIRAGE Operations, Inc. alleges the following.

NATURE OF THE CASE

This is an action for cybersquatting, trademark infringement, unfair competition, and trademark dilution under federal statutes, with pendent state and/or common law claims for trademark infringement, trademark dilution, deceptive trade practices, and intentional interference with prospective economic advantage. Plaintiff seeks damages, attorneys' fees, costs, and preliminary and permanent injunctive relief.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §§ 1331 and 1338(a). This Court has supplemental jurisdiction over Plaintiff's state and common law claims pursuant to 28 U.S.C. § 1367(a).

2. This Court has personal jurisdiction over Defendants based upon the following: (a) Defendants operate websites on the Internet that are accessible to residents of the State of Nevada; (b) the Defendants derive "click through" revenue from "hits" of Internet web users searching for Plaintiff's website who are then diverted to online gambling websites, with which, upon information and belief, Defendants are affiliated; and (c) Defendants have committed tortious acts that Defendants knew or should have known would cause injury to a Nevada resident in the State of Nevada.

3. Venue is proper in the United States District Court for the District of Nevada under 28 U.S.C. §§ 1391(b) and 1391(c). Venue lies in the unofficial Southern division of this Court.

PARTIES

4. Plaintiff MGM MIRAGE Operations, Inc. is a Nevada corporation with its principal place of business in Las Vegas, Nevada. Plaintiff has been authorized to protect and enforce the trademarks owned by Mirage Resorts, Incorporated, New York New York Hotel & Casino, LLC, and Victoria Partners (the "Trademark Owner" individually, and "Trademark Owners" collectively hereinafter).

1 5. Upon information and belief, Oded Keinan is an individual residing and doing
2 business in the London, England.

3 6. Upon information and belief, Traffic Label Limited is an unknown business entity
4 doing business in the London, England.

5 7. Upon information and belief, Oded Keinan and Traffic Label Limited is each the
6 alter ego of the other, and are the officer, agent, servant, representative, and/or employee of the
7 other, acting in participation with the other, having authority or apparent authority to bind the
8 other.

9 **ALLEGATIONS COMMON TO ALL COUNTS**

10 A. The Trademark Owners' Exclusive Rights.

11 8. "The Mirage" is a world-famous destination resort hotel casino located on the
12 "Las Vegas Strip" in Las Vegas, Nevada.

13 9. Since the property opened in 1989, the Trademark Owner and its predecessors-in-
14 interest have continuously used the MIRAGE Marks in connection with advertising and
15 promoting "The Mirage" in the United States and around the world.

16 10. The MIRAGE name and logo are service marks that are owned by the Trademark
17 Owner and are registered on the Principal Register of the United States Patent and Trademark
18 Office, including, among many others:

19 a. MIRAGE: Registration No. 1,870,054 for casino services;

20 b. MIRAGE (and design): Registration No. 1,710,470 for casino services;

21 and

22 c. THE MIRAGE: Registration No. 1,870,053 for casino services.

23 11. The Trademark Owner also owns Nevada state trademark registrations for the
24 MIRAGE mark, as well as common law rights in the MIRAGE mark.

25 12. The Trademark Owner's federal and state registrations have not been abandoned,
26 canceled, or revoked. Moreover, the federal registrations have become incontestable through the
27 filing of Section 8 and 15 affidavits in the Patent and Trademark Office. The federal and state

1 registrations and the common law rights in the MIRAGE Marks shall be collectively referred to
2 herein as the "MIRAGE Marks."

3 13. The Trademark Owner and its predecessors-in-interest have spent substantial
4 sums of money to advertise and promote the MIRAGE Marks in print, broadcast media, and on
5 the Internet through "The Mirage" website accessible throughout the United States and around
6 the world at <mirage.com>, among others. In addition, the Trademark Owner and its
7 predecessors-in-interest have made extensive use of the MIRAGE Marks on, among other things,
8 signage, wearing apparel, souvenirs and promotional materials.

9 14. Based on its federal trademark registrations and extensive use, the Trademark
10 Owner owns the exclusive right to use the MIRAGE Marks in connection with hotel, casino and
11 related services.

12 15. The MIRAGE Marks have become distinctive and famous in the United States
13 and around the world for resort hotel and casino services.

14 16. The "New York New York Las Vegas Hotel & Casino" is a famous destination
15 resort hotel casino located on the "Las Vegas Strip" in Las Vegas, Nevada.

16 17. Since prior to the time it opened in 1997, the Trademark Owner has continuously
17 used the NEW YORK NEW YORK Marks in connection with advertising and promoting the
18 property in the United States and around the world.

19 18. The NEW YORK NEW YORK name and logo are service marks that are owned
20 by the Trademark Owner and are registered on the Principal Register of the United States Patent
21 and Trademark Office, including, among many others:

- 22 a. NEW YORK NEW YORK: Registration No. 2,187,032 for hotel services;
23 and
24 b. NEW YORK NEW YORK: Registration No. 2,187,031 for casino
25 services.

26 19. The Trademark Owner also owns Nevada state trademark registrations for the
27 NEW YORK NEW YORK mark, as well as common law rights in the mark.

1 20. The Trademark Owner's federal and state registrations have not been abandoned,
2 canceled, or revoked. Moreover, the federal registrations have become incontestable through the
3 filing of Section 8 and 15 affidavits in the Patent and Trademark Office. The federal and state
4 registrations and the common law rights in the NEW YORK NEW YORK Marks shall be
5 collectively referred to herein as the "NEW YORK NEW YORK Marks."

6 21. The Trademark Owner has spent substantial sums of money to advertise and
7 promote its name and its business in print, broadcast media and on the Internet through the "New
8 York New York" website accessible throughout the United States and around the world at
9 <nynyhotelcasino.com>, among others. In addition, the Trademark Owner has made extensive
10 use of its mark on, among other things, signage, wearing apparel, souvenirs and promotional
11 materials.

12 22. Based on its federal trademark registrations and use of the marks, the Trademark
13 Owner owns the exclusive right to use its NEW YORK NEW YORK Marks in connection with
14 hotel, casino and related services.

15 23. The NEW YORK NEW YORK Marks have become distinctive and famous in the
16 United States and around the world for resort hotel and casino services.

17 24. The "Monte Carlo Resort & Casino" is a famous destination resort hotel casino
18 located on the world-famous "Las Vegas Strip" in Las Vegas, Nevada.

19 25. Since May 1, 1995, well before the property opened on June 21, 1996, the
20 Trademark Owner has continuously used the MONTE CARLO Marks in connection with
21 advertising and promoting the property in the United States and around the world.

22 26. The Trademark Owner has filed an application for federal registration of the
23 MONTE CARLO service mark with the United States Patent and Trademark Office: MONTE
24 CARLO: Serial No. 76/284329 for casino services, namely, operation of a full-service casino.
25 The Trademark Owner also owns a Nevada state registration for the MONTE CARLO mark
26 (Reg. No. SM00290089), as well as common law rights in the mark. The federal application,
27

1 state registration and common law rights in the MONTE CARLO Marks shall be collectively
2 referred to herein as the “MONTE CARLO Marks.”

3 27. Based on its federal application, state trademark registration and extensive use,
4 the Trademark Owner owns the right to use the MONTE CARLO mark in connection with
5 casino and related services. This federal application and state registration have not been
6 canceled, abandoned or revoked.

7 28. The Trademark Owner has spent substantial sums of money to advertise and
8 promote the MONTE CARLO Marks in print, broadcast media, and on the Internet through the
9 “Monte Carlo” website accessible throughout the United States and around the world at
10 <montecarlo.com>, among others. In addition, the Trademark Owner has made extensive use of
11 the MONTE CARLO Marks on, among other things, signage, wearing apparel, souvenirs and
12 promotional materials.

13 29. The MONTE CARLO Marks have become distinctive and famous in the United
14 States and around the world for resort hotel and casino services.

15 B. Defendants’ Improper Actions.

16 30. On or about June 9, 2005, January 25, 2006, December 25, 2006, and November
17 29, 2008, Defendants respectively registered the <mirage-casino.net>, <miragecasino.org>,
18 <montecarloscasino.com>, and <newyork-casino.info> Internet domain names with Tucows,
19 Inc., Dotregistrar, LLC, and GoDaddy.com Inc., respectively, all of whom are domain name
20 registrars.

21 31. The <mirage-casino.net> and <miragecasino.org> domain names contain the
22 MIRAGE Marks coupled with the word “casino,” which identifies the very services offered
23 under the Trademark Owner’s marks.

24 32. The <newyork-casino.info> domain name contains the NEW YORK NEW
25 YORK Marks coupled with the word “casino,” which identifies the very services offered under
26 the Trademark Owner’s marks.

27

1 33. The <montecarloscasino.com> domain name contains the MONTE CARLO
2 Marks coupled with the word “casino,” which identifies the very services offered under the
3 Trademark Owner’s marks.

4 34. Once a web user arrives at Defendants’ websites linked to the
5 <mirage-casino.net> and <miragecasino.org> domain names, the home pages declare that the
6 Internet user has arrived at the “Mirage Casino” website. The home pages include a description
7 of world-famous “The Mirage” resort hotel casino, which Defendants, upon information and
8 belief, included to cause consumer confusion and create an impression in the mind of the user
9 that Defendants’ websites and online casino links were or are sponsored, affiliated, or associated
10 with the Trademark Owners, as well as a photograph of “The Mirage” at the top of the page. To
11 further confuse the public, Defendants posted a photograph of the “Monte Carlo” casino in the
12 body of the home page and represented that “The Mirage” was depicted therein when it was not.
13 True and accurate copies of the websites linked to the <mirage-casino.net> and
14 <miragecasino.org> domain names are attached hereto as Exhibits 1 and 2, and are incorporated
15 herein by this reference.

16 35. Once a web user arrives at Defendants’ website linked to the
17 <newyork-casino.info> domain name, the home page declares that the Internet user has arrived
18 at the “New York-Casino” website. The website purports to be a resource for New York casinos,
19 but provides no legitimate information about any casinos in the State of New York. Rather, upon
20 information and belief, Defendants intended to draw upon the good will of the world-famous
21 with “New York New York Las Vegas Hotel & Casino” so as to draw Internet users to
22 Defendants’ website and divert those users to other online casinos through the links provided on
23 the home page. A true and accurate copy of the website linked to the <newyork-casino.info>
24 domain name is attached hereto as Exhibit 3, and is incorporated herein by this reference.

25 36. Defendants’ linked the <mirage-casino.net>, <miragecasino.org>, and
26 <newyork-casino.info> domain names to web pages containing links to five online gambling
27 websites: “Rushmore Casino,” “Slots Oasis,” “Grand Mondial Casino,” “Cherry Red Casino,”

1 and “Quatro Casino.” Upon information and belief, Defendants derive “click through”
2 revenue from Internet web users searching for Plaintiff’s websites who are diverted by
3 Defendants to these online gambling websites. Upon information and belief, Defendants give
4 the mistaken impression to users that Defendants and the “Rushmore Casino,” “Slots Oasis,”
5 “Grand Mondial Casino,” “Cherry Red Casino,” and “Quatro Casino” websites are somehow
6 associated or affiliated with, and/or sponsored by the Trademark Owners when they are not.

7 37. Additionally, Defendants posted a copyright notice at the bottom of each of the
8 home pages identifying the ownership of the website in such a manner that users could be
9 confused into believing that Defendants’ website is owned, affiliated, sponsored, or associated
10 with the Trademark Owners: Copyright © Mirage-casino.net 2008, Copyright © Mirage
11 Casino.org 2008, and Copyright © Newyork-Casino.info 2008, respectively.

12 38. Upon information and belief, Defendants linked the <montecarloscasino.com>
13 domain name to a parking page shortly after registration. A true and accurate print out of the
14 parking page linked to the <montecarloscasino.com> domain name is attached hereto as
15 Exhibit 4.

16 39. Defendants also use the MIRAGE Marks and the NEW YORK NEW YORK
17 Marks in hidden text located in metatags on the <mirage-casino.net>, <miragecasino.org> and
18 <newyork-casino.info> websites, respectively. Metatags are self-selected keywords embedded
19 in the source code of a website that are “invisible” to the web user but which are “visible” to
20 search engines.

21 40. Upon information and belief, Defendants use the MIRAGE Marks and the NEW
22 YORK NEW YORK Marks in metatags in an effort to drive Internet traffic to the
23 <mirage-casino.net>, <miragecasino.org> and <newyork-casino.info> domain names,
24 respectively, to generate revenue.

25 41. Defendants have not registered and used the <mirage-casino.net>,
26 <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names in
27 good faith.

42. By registering and using domain names containing the MIRAGE Marks, the NEW YORK NEW YORK Marks, and the MONTE CARLO Marks, Defendants were and are attempting to trade on the goodwill of the Trademark Owners.

43. By registering and using domain names containing the MIRAGE Marks, the NEW YORK NEW YORK Marks, and the MONTE CARLO Marks, and by linking the same to online gambling websites, Defendants were and are attempting to create an association between <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names and the Trademark Owners.

44. By registering and using the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names, Defendants were and are attempting to frustrate or divert Internet traffic intended for the Trademark Owners.

COUNT I
(Cybersquatting
Under The Lanham Act, 15 U.S.C. § 1125(d))

45. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

46. Defendants have registered, trafficked in, and/or used domain names that are confusingly similar to and/or dilutive of Trademark Owners' marks, which were distinctive and/or famous at the time Defendants registered the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names.

47. Upon information and belief, Defendants have or have had a bad faith intent to profit from Trademark Owners' marks.

48. As a direct and proximate result of such conduct, Plaintiff and the Trademark Owners have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

COUNT II

(Trademark Infringement
Under The Lanham Act, 15 U.S.C. § 1114)

49. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

50. Defendants have used and/or are using in commerce the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names, which contain the Trademark Owners' marks, and, thus, Defendants' domain names are confusingly similar to the Trademark Owners' trademarks.

51. Defendants' use in commerce of the Trademark Owners' marks and/or marks confusingly similar to the Trademark Owners' marks in connection with the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names constitutes a reproduction, copying, counterfeiting, and colorable imitation of the Trademark Owners' trademarks in a manner that is likely to cause confusion or mistake or that is likely to deceive consumers.

52. By using the Trademark Owners' marks and/or marks confusingly similar to the Trademark Owners' marks with the knowledge that the Trademark Owners own and have used, and continue to use, their trademarks in Las Vegas, Nevada, across the United States, and around the world, Defendants have intended to cause confusion, cause mistake, or deceive consumers.

53. Defendants are using marks that are the same and/or confusingly similar to the Trademark Owners' marks in connection with the sale, offering for sale, or advertising of services in a manner that is likely to cause confusion or mistake, or to deceive consumers as to an affiliation, connection, or association with the Trademark Owners, or as to the origin, sponsorship, or approval of Defendants' services or commercial activities by Plaintiff and the Trademark Owners.

54. Defendants are also using marks that are the same and/or confusingly similar to the Trademark Owners' marks in the <mirage-casino.net>, <miragecasino.org>,

1 <newyork-casino.info>, and <montecarloscasino.com> domain names to cause initial interest
 2 confusion and to divert Internet users away from the Trademark Owners' websites.

3 55. Defendants' use of the Trademark Owners' marks and/or marks confusingly
 4 similar to the Trademark Owners' marks has created a likelihood of confusion among consumers
 5 who may falsely believe that Defendants' business or the online gambling websites, to which the
 6 domain names are linked, are associated with "The Mirage," the "New York New York Las
 7 Vegas Hotel & Casino," and the "Monte Carlo Resort & Casino" or that Plaintiff and the
 8 Trademark Owners sponsor or approve of Defendants' services or commercial activities.

9 56. As a direct and proximate result of Defendants' infringement, Plaintiff and the
 10 Trademark Owners have suffered, and will continue to suffer, monetary loss and irreparable
 11 injury to their business, reputation, and goodwill.

12 **COUNT III**
 13 (Unfair Competition
 Under The Lanham Act, 15 U.S.C. § 1125(a))

14 57. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set
 15 forth herein.

16 58. Defendants' use in commerce of marks that are the same and/or confusingly
 17 similar to the Trademark Owners' marks in connection with the <mirage-casino.net>,
 18 <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names
 19 constitutes a false designation of origin and/or a false or misleading description or representation
 20 of fact, which is likely to cause confusion, cause mistake, or deceive as to affiliation, connection,
 21 or association with the Trademark Owners, or as to the origin, sponsorship, or approval of
 22 Defendants' services or commercial activities by the Trademark Owners.

23 59. Defendants' use in commerce of the Trademark Owners' marks and/or marks
 24 confusingly similar thereto with the knowledge that the Trademark Owners own and have used,
 25 and continue to use, their trademarks, constitutes intentional conduct by Defendants to make
 26 false designations of origin and false descriptions about Defendants' services and commercial
 27 activities.

60. As a direct and proximate result of such unfair competition, Plaintiff and the Trademark Owners have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

COUNT IV

(Trademark Dilution

Under The Federal Trademark Dilution Act, 15 U.S.C. § 1125(c))

61. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

62. The Trademark Owners' marks are inherently distinctive. Through their adoption and consistent and extensive use, the Trademark Owners' marks have acquired fame.

63. Defendants began using marks that are the same and/or nearly identical to the Trademark Owners' marks in connection with the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names after the Trademark Owners' marks became famous.

64. Defendants' use of the Trademark Owners' marks and/or marks confusingly similar thereto has and will cause dilution of the distinctive quality of the Trademark Owners' trademarks and will otherwise cause irreparable injury to their business, reputation, and goodwill.

65. Upon information and belief, Defendants' use of the Trademark Owners' marks and/or marks confusingly similar thereto was willful in nature, in that Defendants willfully intended to trade on the reputation of the Trademark Owners or to cause dilution of the Trademark Owners' marks.

66. As a direct and proximate result of Defendants' dilution of the Trademark Owners' marks, Plaintiff and the Trademark Owners have suffered, and will suffer, irreparable injury to their business, reputation, and goodwill.

COUNT V

(State Trademark Infringement
Under N.R.S. 600.420)

67. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

68. Defendants have used and/or are using the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names, which contain Trademark Owners' marks, without Plaintiff's or the Trademark Owners' consent.

69. Defendants' use in commerce of Trademark Owners' marks and/or marks confusingly similar to Trademark Owners' marks in the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names, constitutes a reproduction, copying, counterfeiting, and colorable imitation of the Trademark Owners' trademarks in a manner that is likely to cause confusion or mistake or that is likely to deceive consumers.

70. By using the Trademark Owners' marks and/or marks confusingly similar to the Trademark Owners' marks with the knowledge that the Trademark Owners own and have used, and continue to use, their trademarks in Las Vegas, Nevada, Defendants have intended to cause confusion, cause mistake, or deceive consumers.

71. Defendants are using marks that are the same and/or confusingly similar to the Trademark Owners' marks in connection with the sale, offering for sale, or advertising of services in a manner that is likely to cause confusion or mistake, or to deceive consumers as to an affiliation, connection, or association with the Trademark Owners, or as to the origin, sponsorship, or approval of Defendants' services or commercial activities by Plaintiff and the Trademark Owners.

72. Defendants are also using marks that are the same and/or confusingly similar to the Trademark Owners' marks in the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names to cause initial interest confusion and to divert Internet users away from the Trademark Owners' websites.

73. Defendants' use of the Trademark Owners' marks and/or marks confusingly similar to the Trademark Owners' marks has created a likelihood of confusion among consumers who may falsely believe that Defendants' business or the online gambling websites to which Defendants linked the domain names are associated with the "The Mirage," the "New York New York Las Vegas Hotel & Casino," and the "Monte Carlo Resort & Casino" or that Plaintiff and the Trademark Owners sponsor or approve of Defendants' services or commercial activities.

74. As a direct and proximate result of Defendants' infringement, Plaintiff and the Trademark Owners have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

COUNT VI
(State Trademark Dilution
Under N.R.S. § 600.435)

75. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

76. The Trademark Owners' marks are inherently distinctive. Through their adoption and consistent and extensive use, the Trademark Owners' marks have acquired fame in the State of Nevada.

77. Defendants began using marks that are the same and/or confusingly similar to the Trademark Owners' marks in connection with Defendants' services, associated online gambling websites, and Internet domain names after Trademark Owners' marks became famous in the State of Nevada.

78. Defendants' use of the Trademark Owners' marks and/or marks confusingly similar thereto has and will cause dilution of the distinctive quality of the Trademark Owners' trademarks and will otherwise cause irreparable injury to the Trademark Owners' business, reputation, and goodwill.

79. Upon information and belief, Defendants' use of the Trademark Owners' marks and/or marks confusingly similar thereto was willful in nature in that Defendants intended to

1 cause dilution of the Trademark Owners' marks or willfully intended to trade on the Trademark
2 Owners' reputation.

3 80. As a direct and proximate result of Defendants' dilution of the Trademark
4 Owners' marks, Plaintiff and the Trademark Owners have suffered, and will suffer, irreparable
5 injury to their business, reputation, and goodwill.

6
7 **COUNT VII**
(Common Law Trademark Infringement)

8 81. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set
9 forth herein.

10 82. By virtue of having used and continuing to use the Trademark Owners' marks, the
11 Trademark Owners have acquired common law trademark rights in the Trademark Owners'
12 marks.

13 83. Defendants' use of marks the same and/or confusingly similar to the Trademark
14 Owners' marks infringes the Trademark Owners' common law trademark rights in their marks
15 and is likely to cause confusion, mistake, or deception among consumers who will believe that
16 Defendants' services, associated online gambling websites and/or Internet domain names
17 originate from, or are affiliated with, or are endorsed by Plaintiff and the Trademark Owners,
18 when, in fact, they are not.

19 84. As the direct and proximate result of Defendants' infringement of the Trademark
20 Owners' common law trademark rights under Nevada and other common law, Plaintiff and the
21 Trademark Owners have suffered, and will continue to suffer, monetary damages and irreparable
22 injury to their business, reputation, and goodwill.

23 **COUNT VIII**
24 (Deceptive Trade Practices
Under N.R.S. § 598.0915)

25 85. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set
26 forth herein.

86. Upon information and belief, in the course of conducting business, Defendants knowingly made false representations as to an affiliation, connection, and/or association with the Trademark Owners by using a mark identical and/or confusingly similar to the Trademark Owners' marks, and otherwise engaged in deceptive trade practices.

87. As the direct and proximate result of Defendants' deceptive conduct, Plaintiff and the Trademark Owners have suffered, and will continue to suffer, monetary damages and irreparable injury to their business, reputation, and goodwill.

COUNT IX
(Intentional Interference With
Prospective Economic Advantage)

88. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

89. Upon information and belief, at the time Defendants adopted and began using marks that are the same and/or confusingly similar to the Trademark Owners' marks, and since that time, Defendants knew and have known that the Trademark Owners are in the business of providing resort hotel casino services, and that the Trademark Owners advertise those services on the Internet using the Trademark Owners' marks.

90. Upon information and belief, Defendants committed acts intended or designed to disrupt the Trademark Owners' prospective economic advantage arising from providing those services.

91. Defendants' actions have disrupted or are intended to disrupt the Trademark Owners' business by, among other things, diverting web users away from the Trademark Owners' websites and to the websites Defendants linked to the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names.

92. Defendants have no legal right, privilege or justification for this conduct.

93. As a direct and proximate result of Defendants' intentional interference with the Trademark Owners' prospective economic advantage, Plaintiff and the Trademark Owners have suffered, and will continue to suffer, monetary damages and irreparable injury.

94. Based on the intentional, willful and malicious nature of Defendants' actions, Plaintiff and the Trademark Owners are entitled to recover monetary damages, exemplary or punitive damages and reasonable attorneys' fees and costs incurred in connection with this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that the Court grant the following relief:

A. A preliminary and permanent injunction prohibiting Defendants, Defendants' agents, servants, employees and/or all persons acting in concert or participation with Defendants, from: (1) using the MIRAGE Marks, the NEW YORK NEW YORK Marks, and the MONTE CARLO Marks or confusingly similar variations thereof, alone or in combination with any other letters, words, letter strings, phrases or designs, in commerce or in connection with any business or for any purpose whatsoever (including, but not limited to, on websites, in domain names, in hidden text and metatags); and (2) registering or trafficking in any domain names containing the MIRAGE Marks, the NEW YORK NEW YORK Marks, and the MONTE CARLO Marks or confusingly similar variations thereof, alone or in combination with any other letters, words, phrases or designs.

B. A preliminary and permanent injunction requiring the current domain name registrars to transfer the <mirage-casino.net>, <miragecasino.org>, <newyork-casino.info>, and <montecarloscasino.com> domain names to Plaintiff;

C. An award of compensatory, consequential, statutory, exemplary, and/or punitive damages to Plaintiff in an amount to be determined at trial;

D. An award of interest, costs and attorneys' fees incurred by Plaintiff in prosecuting this action; and

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1 E. All other relief to which Plaintiff is entitled.

2 DATED: April 23, 2009.

3 LEWIS AND ROCA LLP

4 By: /s/ John L. Krieger

5 Michael J. McCue

6 John L. Krieger

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7 (702) 949-8200

8 Attorneys for

MGM MIRAGE OPERATIONS, INC.

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MGM MIRAGE OPERATIONS, INC.

v.

KEINAN, et al.

**COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF**

EXHIBIT 1



Gambling Casino Vegas Slot Casino Foreign Casino Casino US Gamble Places

MENU

Las Vegas Casino
Hotels

LAS VEGAS HOTELS

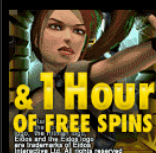
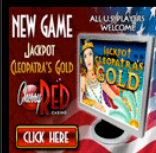


Online bingo is another of the fastest-growing games on the internet. ([Las Vegas Hotels](#))

LAS VEGAS CASINO GAMBLING



Anyone referring their friends to play at Bingo Day UK can expect to earn a little extra gaming credit. ([Las Vegas Casino Gambling](#))



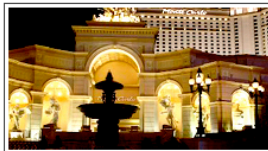
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Grand Casino
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Online Casino UK



LAS VEGAS CASINO HOTELS

LAS VEGAS CASINO HOTELS - MIRAGE CASINO



Location: The Mirage Hotel and Casino

3400 Las Vegas Blvd.
Las Vegas, NV 89109

The Mirage Hotel and Casino:

Towards the entrance, guests perceive soothing sound of waterfalls, aroma of the alien flowers and can rest on a bridge underneath the 90-foot-high glass porch at the same time as taking in the tropical surroundings. You are welcomed by the exploding volcano out in the front and the crowd of people wrinkled up to glimpse the free show and don't get frightened as inside you will come across white tigers and sharks. You feel like Bali even though you are in the Mirage. In the lobby, visitors coming up to make sure in are keep amused by the aquatic life in a 20,000-gallon saltwater aquarium at the back of the frontage counter. Almost 1,000 aquatic life forms, including sharks, stingrays, and porcupine fish, eels, sea bass and puffer fish entitle this as aquarium home. A full-service janitor at the flipside of the lobby provides help to anyone in search of it not only to the hotel guests. The Mirage set the pitch for going away great and is still the resort that lay down the standard for everybody to live up to. This is a soaring end resort with inexpensive restaurants, large casino and quality accommodations. (Ref: [Accommodation Las Vegas](#))

Rooms: a little over 3000 rooms at the Mirage that are garlanded with high class fixtures and all the superfluous you would be expecting from a luxurious resort. Though, contrast with the other hotels on the strip you may be dissatisfied by the size of the lodging as they are a bit less significant. If you ask for a strip vision, you will get any vision of the volcano or a view south on Las Vegas Blvd which equally make you contented you spend the additional money to reside at the Mirage.

The cost: Weekends are costliest around \$200 per night but weekdays start around \$110

Restaurants: Kokomo's, Mikado, Samba Brazilian Steakhouse, Stack, Caribe Cafe, Cravings, the Buffet, California Pizza Kitchen, Paradise Cafe, the Noodle Kitchen, Japonaise, Carnegie Deli

Entertainment: Danny Gans Theatre, Tiger Habitat, Secret Garden and Dolphin Habitat, Mirage Volcano, Cirque du Soleil "Love"

Mirage Hotel and Casino attraction

Glance in to the Mirage you come upon the colossal salt water aquarium that outline the wall at the back of the clerks. A gaze at the many species of fishes shows that it's like the hotel lobby home. The buffet, "Cravings", is one of the best in town and along with the Carnegie deli should easily help stash away some leftovers for late night snacking. Take a look at the Secret Garden and get up close and personal with the dolphins.

The Mirage Hotel and Casino draws

If you are not fond of swarms this might be a setback, the Mirage still is a focus for a group of people. Though, restaurants like Kokomo do provide seating in tropical surroundings where you can leave the swarm at the back and enjoy the comforting echo of ecstasy in the desert. One more thing that might not be excessively flattering is the table limits on weekends; they have a tendency to go all the way through the roof and whatever thing lesser than \$10 is imaginary

<http://govegas.about.com/cs/hotels/p/bellagiopro.htm>

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LAS VEGAS HOTELS

LAS VEGAS HOTELS - SAHARA HOTEL AND CASINO

To be found on the northern end of the Las Vegas Strip the celebrated Sahara Hotel and Casino is the electrifying resort prosperous with the past and attraction. This milestone hotel features further 1,700 of the majority airy, attractively appointed and relaxed rooms on the Las Vegas Strip. Most of Sahara's rooms and suites have high speed Internet access and a wealth of services to make your hang about unforgettable. (Ref: [Casino in Las Vegas](#))

What on earth your daydream; you'll discover it at the Sahara:



- The city's most recent buzz traverse
- The majority preferred entertainment
- added 1,700 of Las Vegas' most contented rooms and suites
- The most modern Las Vegas hotel deals
- a large amount tormenting dining options, including four stupendous restaurants and the good-looking NASCAR Cafe

Features

Residing at Sahara gives you major right of entry to our pool, business center, Destination Spa Salon, the Las Vegas Monorail, Sahara's alluring buffet and restaurants and remarkable Las Vegas shows. The Sahara has quite a few dissimilar models of rooms to pick from, together with standard rooms, deluxe rooms, and luxuriously appointed suites.

Entertainment

The Sahara Since aperture into the gambling world in 1952 has been setting the theater for Las Vegas' most modern amusement and brightest stars, conducting such renowned performers as Johnny Carson, Tina Turner, The Beatles and Dean Martin and Jerry Lewis.

To facilitate that tradition persists in the present day with a world of amusement under one crown in the well-liked Sahara Theater, the renowned Congo Room and the cherished Caspar Theater loaf, which offers live amusement every night.

Sahara Casino accomplishment

The Sahara is habitat to 85,000 square feet of the Strip's most modern and mainly advanced slots, together with ticket inside and not at home. Engage in recreation with vast jackpot progressives, lively video poker or a range of slots with our practice promotions that give huge. The Sahara in addition provides the trendy table games that players wish for the most part and the majority munificent player's association in township - Club Sahara.

<http://www.saharavegas.com/casino>

LAS VEGAS HOTELS - IMPERIAL PALACE

Location- Centrally positioned on top of the Strip, the Imperial Palace presents entertaining shows and magnetism, alluring restaurants and within your means rooms.

Features

The royally citadel Imperial Hotel & Casino runs with a fairly distinguished crowd. Caesars Palace is across the street. The Flamingo and Harrah's margin the hotel on both faces. Through fellow citizen like these, assets should experience obliged to put it separately to present an amazing than the additional resorts hypocrisy. The Imperial Palace has got three. (Ref. [Luxury Vegas Casinos](#))

Attractions

For first course, Legends in Concert and The Auto Collections have been attracting guests through the thousands for an extra decade, and their attractiveness remains physically powerful. "Legends" is individually the largest part admired complimented shows in the human race, by means of performers imitating Elvis, Elton John and Madonna, in the middle of others, in performance to full to capacity dwellings six nights a week. The Auto Collections motivates do again trips, by way of its first-class collection of classic cars that previously be in the right place to personalities and leaders of state. In conclusion, indoors the casino, the Dealer trainers Pit attracts guests to attempt their fortune at the tables. If you've forever dreamt concerning playing blackjack against your preferred celebrity, compose the Imperial Palace your Vegas residence missing since house.

Most excellent advertising Hotels

- Excalibur
- Tropicana
- Venetian
- Paris Las Vegas
- Stratosphere

5 Star Hotels

- Venetian
- Wynn Las Vegas
- Bellagio
- Hotel at Mandalay Bay

4 - 4.5 Star Hotels

- Caesars Palace
- Palms
- MGM Grand
- Mirage (Casino at Mirage)
- Paris Las Vegas

3 - 3.5 Star Hotels

- Excalibur
- Tropicana
- Stratosphere
- Imperial Palace
- Sahara

<http://www.saharavegas.com/casino>

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LAS VEGAS CASINO GAMBLING

LAS VEGAS CASINO GAMBLING - MONTE CARLO HOTEL & CASINO



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Number of rooms: 3,002 rooms and 256 suites.

Casino: 90,000 square feet. Casino games include Roulette, Blackjack, Pai Gow Poker, Craps, Baccarat and Caribbean Stud Poker, video poker machines and 2,200 slots, together with Megabucks and Super Megabucks. The casino has also got a poker room. (Ref. [Gamble in Vegas](#))

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Typical room facilities: Air conditioning, remote-controlled cable TV, alarm clock/radio, hair dryer, desk, electronic door locks, iron plus ironing board, pay-per-view movies, telephone, voice mail.

Hotel services: Laundry, currency exchange, luggage plus maid service, wake-up calls, safety deposit box.

Sign in time: 3 p.m.

Sign out time: 11 a.m.

Least age to preserve a room: 21 years.

Rule: The utmost entire number of visitors (adults and kids) in a room is four.

Secondary fees: Hotel needs a credit card or a cash deposit used for secondary fees.
<http://www.saharavegas.com/casino>

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MIRAGE-CASINO

LAS VEGAS HOTELS

[Gambling Casino](#) [Vegas Slot Casino](#) [Foreign Casino](#) [Casino US](#) [Gamble Places](#)

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[Las Vegas Casino Hotels](#)

LAS VEGAS HOTELS



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LAS VEGAS CASINO GAMBLING

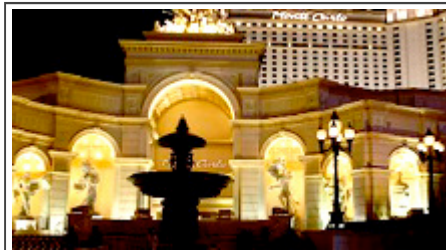


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LAS VEGAS CASINO HOTELS

LAS VEGAS CASINO HOTELS - MIRAGE CASINO



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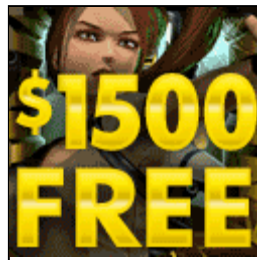
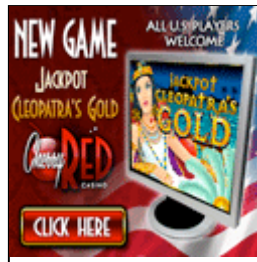
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(Las Vegas Casino
Gambling)



RELATED LINKS

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[Gamble In China](#)
[Grand Casino](#)
[Online Casino US](#)
[Online Casino UK](#)



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LAS VEGAS HOTELS

LAS VEGAS HOTELS - SAHARA HOTEL AND CASINO

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- Tropicana
- Venetian
- Paris Las Vegas
- Stratosphere

5 Star Hotels

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- Wynn Las Vegas
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- Hotel at Mandalay Bay

4 - 4.5 Star Hotels

- Caesars Palace
- Palms

- MGM Grand
- Mirage (**Casino at Mirage**)
- Paris Las Vegas

3 - 3.5 Star Hotels

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- Tropicana
- Stratosphere
- Imperial Palace
- Sahara

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Las Vegas Casino
Hotels

LAS VEGAS HOTELS

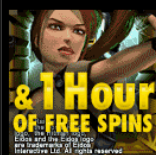
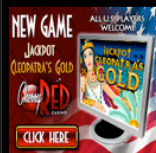


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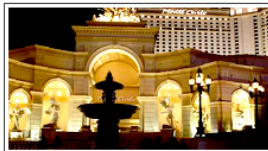
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LAS VEGAS CASINO HOTELS

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LAS VEGAS HOTELS

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What on earth your daydream; you'll discover it at the Sahara:



MIRAGE CASINO**CASINO AT MIRAGE**

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MENU

[Casino At Mirage](#)

PLAYERS CLUB

Gamblers in a poker game act in turn; in clockwise revolution (acting out of turn can unenthusiastically affect other gamblers). ([Players Club](#))

BLACKJACK

You've heard all of the talk and now you're prepared to gamble the game that gives gamblers the most excellent 'edge' against the house, correct? Well. ([Blackjack](#))

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Rushmore **FREE BONUS \$888** **ALL US PLAYERS ARE WELCOME!**

CASINO AT MIRAGE**Welcome to Mirage casino**

Out front you are welcomed by the erupting volcano and the throngs of individuals lined up to see the free show and inside you will come across white tigers and sharks. This is still a Mirage in the wasteland only now it has taken a seat further back relative to the rest of the mega-resorts.



The Mirage put the tone for going great and is still the resort that set the normal for everybody to live up to. This is a high end option with reasonable restaurants, large casino and quality lodging.

Risk-taking can be exciting, and nowhere is it more exciting than at the gaming tables of a showy casino, where the cards are dealt skillfully, the cocktails are delivered non-stop and the fever of winning runs high.

These days, with folks spending more on betting than they do on movie-going, casinos have to be capable to struggle with the most recent facilities, the most recent dining venues, the best amusement, the most comfortable spas and elite high-end fashion outlets.

High rollers will be pleased to determine that these, our top ten picks for the best casino hotels in the planet, complete those requirements wonderfully. Its great amusement in casinos after all it's all about cash and you can gamble most interesting games like poker and blackjack and you can become a millionaire overnight, the all you have to be cautious about is that while you gamble poker you should be conscious of different poker bets.

This is a name many will distinguish as one of the boldest companies when it comes to seeking advertising. Some of their projects are disgraceful, which includes their Spiderman who climbs the world's major bridges, streamers at sports events and their acquires off all sorts of strange things on EBay.

Luckily there is no fooling around when it comes to the casino itself, The most excellent part is that you can even succeed lot of casino additional benefit. It runs on the now particularly improved Technology platform, giving you contact to top class games of all kinds.

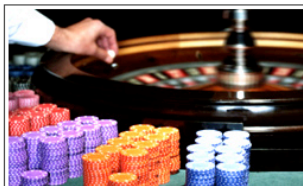
The software is very agreeable on the eye and ensures that your gambling understanding is rich and enjoyable. The table games are outstanding and the slots some of the more thrilling around. The casino runs great promos, with a additional benefit on the first deposit you make every month, which is strange but very welcome!

ALL US PLAYERS ARE WELCOME
SLOTS OASIS
 PAYLINE PARADISE

400% MATCH BONUS!



PLAY NOW!

PLAYERS CLUB

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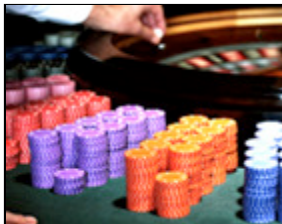


MIRAGE CASINO**CASINO AT MIRAGE**

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Casino At Mirage

PLAYERS CLUB

Gamblers in a poker game act in turn; in clockwise revolution (acting out of turn can unenthusiastically affect other gamblers) . [\(Players Club\)](#)

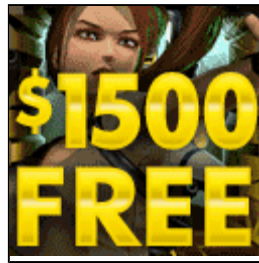
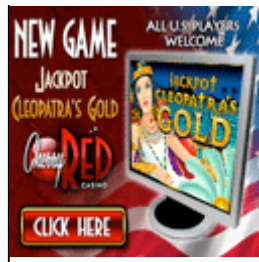
BLACKJACK

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**CASINO AT MIRAGE****Welcome to Mirage casino**

Out front you are welcomed by the erupting volcano and the throngs of individuals lined up to see the free show and inside you will come across white tigers and sharks. This is still a Mirage in the wasteland only now it has taken a seat further back relative to the rest of the mega-resorts.





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The Mirage put the tone for going great and is still the resort that set the normal for everybody to live up to. This is a high end option with reasonable restaurants, large casino and quality lodging.

Risk-taking can be exciting, and nowhere is it more exciting than at the gaming tables of a showy casino, where the cards are dealt skillfully, the cocktails are delivered non-stop and the fever of winning runs high.

These days, with folks spending more on betting than they do on movie-going, casinos have to be capable to struggle with the most recent facilities, the most recent dining venues, the best amusement, the most comfortable spas and elite high-end fashion outlets.

High rollers will be pleased to determine that these, our top ten picks for the best casino hotels in the planet, complete those requirements wonderfully. Its great amusement in casinos after all it's all about cash and you can gamble most interesting games like poker and blackjack and you can become a millionaire overnight, the all you have to be cautious about is that while you gamble poker you should be conscious of different poker bets.

This is a name many will distinguish as one of the boldest companies when it comes to seeking advertising. Some of their projects are disgraceful, which includes their Spiderman who climbs the world's major bridges, streamers at sports events and their acquires off all sorts of strange things on EBay.

Luckily there is no fooling around when it comes to the casino itself, The most excellent part is that you can even succeed lot of casino additional benefit. It runs on the now particularly improved Technology platform, giving you contact to top class games of all kinds.

The software is very agreeable on the eye and ensures that your gambling understanding is rich and enjoyable. The table games are outstanding and the slots some of the more thrilling around. The casino runs great promos, with a additional benefit on the first deposit you make every month, which is strange but very welcome!

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EXHIBIT 3

UNITED STATES DISTRICT COURT
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MGM MIRAGE OPERATIONS, INC.

v.

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**COMPLAINT FOR DAMAGES
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EXHIBIT 3



Best Rated Casinos List Of Casino Games Latest Online Casinos All Slots Casino Casino Games For PC

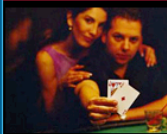
NEW YORK E CASINO



Ever wanted to go to the casino without leaving the comfort of your home? Well if you really want to have a great time without the hassle for going to a casino then check out the various New York online casinos .

(New York E Casino)

NEW YORK ONLINE CASINO PAYOUTS



New York Internet gambling has become big business these days, with gamblers from all over the world using it as a form of recreation or to, hopefully, makes some extra cash. (New York Online Casino Payouts)

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New York Online Casino Industry



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You can play your favorite online casino game at an New York online casino. You can choose different casinos to play from, each giving you the best games that they can offer.

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ALL US PLAYERS ARE WELCOME

SLOTS OASIS
PAYLINE PARADISE

400%
MATCH
BONUS!



PLAY
NOW!

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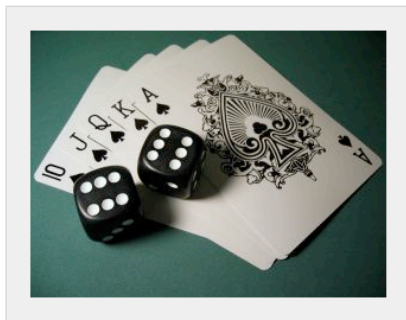
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NEWYORK-CASINO

NEW YORK CASINO

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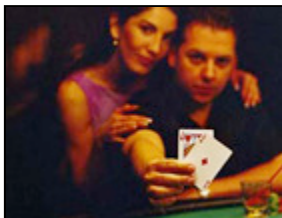
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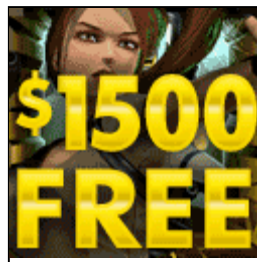
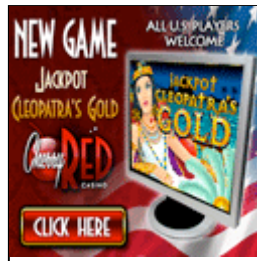
NEW YORK E CASINO

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([New York Online Casino Payouts](#))

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New York Online Casino
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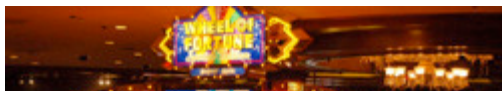
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EXHIBIT 4



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JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

MGM MIRAGE OPERATIONS, INC.

(b) County of Residence of First Listed Plaintiff Clark
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

John L. Krieger, Lewis and Roca LLP, 3993 Howard Hughes Pkwy.,
Suite 600, Las Vegas, NV 89169 (702) 949-8200

DEFENDANTS

ODED KEINAN and TRAFFIC LABEL LIMITED

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. sec. 1125(d); 15 U.S.C. sec. 1114; 15 U.S.C. sec. 1125(a); 15 U.S.C. sec. 1125(c)

Brief description of cause:
Cybersquatting and Trademark Infringement

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

04/23/2009

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

AO 440 (Rev. 02/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff

v.

Defendant

)
)
)
)
)
)
)

Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 02/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff

v.

Defendant

)
)
)
)
)
)
)

Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

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 was received by me on *(date)* _____.

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 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: