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21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF ARIZONA**

23 Tamaris (Gibraltar) Limited,

Case No.

24 Plaintiff,

**COMPLAINT**

25 v.

26 pragmaticplays.co; pragmaticplay.center;  
27 pragmaticplay.world; pragmaticplay.bet;  
28 pragmaticplays.cloud; pragmaticplay.events;  
pragmaticplay.support; pragmaticplay.cam;  
pragmaticplay.app; pragmaticplay.rsvp;  
ppgames.games; pragmaticplaydemo.live;  
pragmaticplays.live; pragmaticplay.download;  
pragmaticplay.asia; pragmaticplayindonesia.asia;  
pp-games.net; pragmaticplay.mobi;  
pragmaticplaydemo.info; pragmaticplays.info;  
ppgamescenter.click; ppgames-center.click;  
ppgames-hub.click; ppgameshub-tr.click;

1 ppgameshub-trk.click; ppgames-hubtrk.click;  
2 ppgameshub-tur.click; ppgameshub-turk.click;  
3 ppgames-hubturk.click; ppgames-net.click;  
4 ppgames-new.click; ppgames-spot.click;  
5 ppgamestr.click; ppgames-tr.click;  
6 ppgamestrk.click; ppgames-trk.click;  
7 ppgamestur.click; ppgames-tur.click;  
8 ppgamesturk.click; ppgames-turk.click;  
9 pragmaticplays.click; pragmaticplayslot.top;  
10 pragmaticplay.one; pragmaticplay.rest;  
11 pragmaticplayindonesia.online;  
12 pragmaticplays.website; pragmaticplays.biz;  
13 pragmaticplayslot.vip; pragmaticplay.cfd;  
14 pragmaticplay123.xyz; pragmaticplayslot.xyz;  
15 pragmaticplay.win; pragmaticplay.today;  
16 pragmaticplay.ink; pragmaticplayslot.biz;  
17 pragmaticplayslot.club; and pragmaticplay.club,  
18 Domain Names,

Defendants.

19 Plaintiff Tamaris (Gibraltar) Limited, operating as Pragmatic Play (“Plaintiff” or  
20 “PragmaticPlay”), through counsel, alleges as follows for its *in rem* Complaint against  
21 Defendants pragmaticplays.co; pragmaticplay.center; pragmaticplay.world;  
22 pragmaticplay.bet; pragmaticplays.cloud; pragmaticplay.events; pragmaticplay.support;  
23 pragmaticplay.cam; pragmaticplay.app; pragmaticplay.rsvp; ppgames.games;  
24 pragmaticplaydemo.live; pragmaticplays.live; pragmaticplay.download;  
25 pragmaticplay.asia; pragmaticplayindonesia.asia; pp-games.net; pragmaticplay.mobi;  
26 pragmaticplaydemo.info; pragmaticplays.info; ppgamescenter.click; ppgames-center.click;  
27 ppgames-hub.click; ppgameshub-tr.click; ppgameshub-trk.click; ppgames-hubtrk.click;  
28 ppgameshub-tur.click; ppgameshub-turk.click; ppgames-hubturk.click; ppgames-net.click;  
ppgames-new.click; ppgames-spot.click; ppgamestr.click; ppgames-tr.click;  
ppgamestrk.click; ppgames-trk.click; ppgamestur.click; ppgames-tur.click;  
ppgamesturk.click; ppgames-turk.click; pragmaticplays.click; pragmaticplayslot.top;  
pragmaticplay.one; pragmaticplay.rest; pragmaticplayindonesia.online;  
pragmaticplays.website; pragmaticplays.biz; pragmaticplayslot.vip; pragmaticplay.cfd;

1 pragmaticplay123.xyz; pragmaticplayslot.xyz; pragmaticplay.win; pragmaticplay.today;  
2 pragmaticplay.ink; pragmaticplayslot.biz; pragmaticplayslot.club; and pragmaticplay.club  
3 (the “Defendant Domain Names”).

4 **NATURE OF THE SUIT**

5 1. This is an *in rem* action for cybersquatting under the Federal Anti-  
6 Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), filed in this District pursuant  
7 to 15 U.S.C. § 1125(d)(2)(C) in that the registrars and/or registry operators for each of the  
8 Defendant Domain Names are situated in this District.

9 2. Recent government reports highlight the prevalence of cybersquatting,  
10 associated trademark infringement, and attendant harm to consumers and brands.  
11 Cybersquatting actors have grown more and more sophisticated with misuse of protected  
12 marks, beyond simply seeking to gain internet traffic intended for the mark holder. Today’s  
13 cybersquatters engage in bad acts including leveraging trademark recognition to distribute  
14 computer viruses or “malware,” to collect visitors’ personal information for inappropriate  
15 or illegal uses, to generate revenue by displaying pay-per-click advertisements related to the  
16 legitimate site or, in the case of many of the Defendant Domain Names, to display  
17 counterfeit versions of brand owners’ marks and goods or services.

18 3. The launch of new top-level domains (e.g., .tools, .website, .live, .xyz, etc., as  
19 alternatives to the traditional generic top-level domains .com, .net, and .org) has provided  
20 new opportunities for cybersquatters to misuse and abuse protected marks for their own gain.

21 4. Cybersquatting harms consumers by causing confusion with the legitimate sites  
22 being sought by the consumers and very often results in consumers’ computers being  
23 infected with computer viruses, “bloatware” or other unwanted software, consumer’s  
24 personal information being collected and misused, and/or consumers being presented with  
25 an endless stream of unwanted advertisements.

26 5. In the present case, Pragmatic Play’s invaluable rights in the distinctive and  
27 federally registered PRAGMATIC PLAY and PPGAMES Marks have been deliberately  
28 infringed through the bad faith registration, use, and/or trafficking of the Defendant Domain

1 Names, which domain names are confusingly similar to the PRAGMATIC PLAY and  
2 PPGAMES Marks.

3 **PARTIES**

4 6. Tamaris (Gibraltar) Limited is a Gibraltarian limited company with a principal  
5 business address of Madison Building, Midtown, Queensway, Gibraltar.

6 7. pragmaticplays.co is an Internet domain name which, according to the WhoIs  
7 registration data, is registered with the registrar GoDaddy to an unidentified person/entity  
8 using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and  
9 location. A copy of the domain name registration record is attached hereto as **Exhibit 1**. The  
10 domain wholly incorporates Pragmatic Play’s protected PRAGMATIC PLAY mark, merely  
11 pluralized, with the addition of the top-level domain (“TLD”) .co. The website to which the  
12 domain resolves spoofs Pragmatic Play’s legitimate website, including using Pragmatic  
13 Play’s registered stylization of its trademark and images from its copyrighted games.

14 8. pragmaticplay.center is an Internet domain name which, according to the  
15 WhoIs registration data, is registered with the registrar GoDaddy to an unidentified  
16 person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its  
17 identity and location. A copy of the domain name registration record is attached hereto as  
18 **Exhibit 2**. The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY  
19 mark, with the addition of the TLD .center which is a descriptive term that relates to  
20 Pragmatic Play’s online services. The website to which the domain resolves misuses  
21 Pragmatic Play’s registered stylization of its trademark and images from its copyrighted  
22 games.

23 9. pragmaticplay.world is an Internet domain name which, according to the WhoIs  
24 registration data, is registered with the registrar GoDaddy to an unidentified person/entity  
25 using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and  
26 location. A copy of the domain name registration record is attached hereto as **Exhibit 3**. The  
27 domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark, with the  
28 addition of the TLD .world which is a descriptive term that relates to Pragmatic Play’s multi-

1 national online services. The website to which the domain resolves misuses Pragmatic Play's  
2 registered stylization of its trademark and images from its copyrighted games.

3 10. pragmaticplay.bet is an Internet domain name which, according to the WhoIs  
4 registration data, is registered with the registrar GoDaddy to an unidentified person/entity  
5 using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and  
6 location. A copy of the domain name registration record is attached hereto as **Exhibit 4**. The  
7 domain consists entirely of Pragmatic Play's protected PRAGMATIC PLAY mark, with the  
8 addition of the TLD .bet which is a descriptive term that relates to Pragmatic Play's online  
9 gaming services. The website to which the domain resolves provides online gaming services  
10 similar to those offered by Pragmatic Play.

11 11. pragmaticplays.cloud is an Internet domain name which, according to the  
12 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
13 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
14 identity and location. A copy of the domain name registration record is attached hereto as  
15 **Exhibit 5**. The domain consists entirely of Pragmatic Play's protected PRAGMATIC PLAY  
16 mark, pluralized, with the addition of the TLD .cloud which is a descriptive term that relates  
17 to Pragmatic Play's online services.

18 12. pragmaticplay.events is an Internet domain name which, according to the  
19 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
20 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
21 identity and location. A copy of the domain name registration record is attached hereto as  
22 **Exhibit 6**. The domain consists entirely of Pragmatic Play's protected PRAGMATIC PLAY  
23 mark, with the addition of the TLD .events which is a descriptive term that relates to  
24 Pragmatic Play's online services.

25 13. pragmaticplay.support is an Internet domain name which, according to the  
26 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
27 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
28 identity and location. A copy of the domain name registration record is attached hereto as

1 **Exhibit 7.** The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY  
2 mark, with the addition of the TLD .support which is a descriptive term that relates to  
3 Pragmatic Play’s online services. The website to which the domain resolves displays pay-  
4 per-click advertising.

5 14. pragmaticplay.cam is an Internet domain name which, according to the WhoIs  
6 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
7 using the privacy service Withheld for Privacy Purposes to conceal his/her/its identity and  
8 location. A copy of the domain name registration record is attached hereto as **Exhibit 8.** The  
9 domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark, with the  
10 addition of the TLD .cam which is highly similar to the generic TLD .com and is a common  
11 misspelling thereof.

12 15. pragmaticplay.app is an Internet domain name which, according to the WhoIs  
13 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
14 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
15 location. A copy of the domain name registration record is attached hereto as **Exhibit 9.** The  
16 domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark, with the  
17 addition of the TLD .app which is a descriptive term that relates to Pragmatic Play’s online  
18 services.

19 16. pragmaticplay.rsvp is an Internet domain name which, according to the WhoIs  
20 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
21 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
22 location. A copy of the domain name registration record is attached hereto as **Exhibit 10.**  
23 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
24 with the addition of the TLD .rsvp which is a descriptive term that relates to Pragmatic Play’s  
25 live gaming services.

26 17. ppgames.games is an Internet domain name which, according to the WhoIs  
27 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
28 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and

1 location. A copy of the domain name registration record is attached hereto as **Exhibit 11**.  
2 The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC PLAY mark  
3 with consists entirely of Pragmatic Play’s protected PPGAMES mark, with the addition of  
4 the TLD .games which is a descriptive term that relates to Pragmatic Play’s online gaming  
5 services. The website to which the domain resolves includes pay-per-click advertising.

6 18. pragmaticplay.club is an Internet domain name which, according to the WhoIs  
7 registration data, is registered with the registrar Dynadot to an unidentified person/entity  
8 using a privacy service to conceal his/her/its identity and location. A copy of the domain  
9 name registration record is attached hereto as **Exhibit 12**. The domain wholly incorporates  
10 Pragmatic Play’s protected PRAGMATIC PLAY mark with consists entirely of Pragmatic  
11 Play’s protected PRAGMATIC PLAY mark, with the addition of the TLD .club. The  
12 website to which the domain resolves includes pay-per-click advertising.

13 19. pragmaticplaydemo.live is an Internet domain name which, according to the  
14 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
15 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
16 identity and location. A copy of the domain name registration record is attached hereto as  
17 **Exhibit 13**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
18 PLAY mark with the addition of the descriptive term “demo” and the TLD .live which are  
19 descriptive terms that relate to Pragmatic Play’s live gaming services. The website to which  
20 the domain resolves includes pay-per-click advertising.

21 20. pragmaticplays.live is an Internet domain name which, according to the WhoIs  
22 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
23 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
24 location. A copy of the domain name registration record is attached hereto as **Exhibit 14**.  
25 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
26 pluralized, with the addition of the TLD .live which is a descriptive term that relates to  
27 Pragmatic Play’s live gaming services.

28



1           21. pragmaticplay.download is an Internet domain name which, according to the  
2 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
3 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
4 identity and location. A copy of the domain name registration record is attached hereto as  
5 **Exhibit 15**. The domain consists entirely of Pragmatic Play’s protected PRAGMATIC  
6 PLAY mark, with the addition of the TLD .download which is a descriptive term that relates  
7 to Pragmatic Play’s online services. The website to which the domain resolves includes pay-  
8 per-click advertising.

9           22. pragmaticplay.asia is an Internet domain name which, according to the WhoIs  
10 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
11 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
12 location. A copy of the domain name registration record is attached hereto as **Exhibit 16**.  
13 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
14 with the addition of the TLD .asia which is a geographically descriptive term that relates to  
15 Pragmatic Play’s multi-national services.

16           23. pragmaticplayindonesia.asia is an Internet domain name which, according to  
17 the WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
18 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
19 identity and location. A copy of the domain name registration record is attached hereto as  
20 **Exhibit 17**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
21 PLAY mark with the addition of the geographically descriptive term “Indonesia” and the  
22 TLD .asia which is also geographically descriptive, both of which relate to Pragmatic Play’s  
23 multi-national services. The website to which the domain resolves includes pay-per-click  
24 advertising.

25           24. pp-games.net is an Internet domain name which, according to the WhoIs  
26 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
27 using a privacy service to conceal his/her/its identity, and identifying his or her location only  
28 generally as “KR.” A copy of the domain name registration record is attached hereto as



1 **Exhibit 18.** The domain consists entirely of Pragmatic Play’s protected PPGAMES mark,  
2 with the addition of a hyphen and the generic TLD .net.

3 25. pragmaticplay.mobi is an Internet domain name which, according to the WhoIs  
4 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
5 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
6 location. A copy of the domain name registration record is attached hereto as **Exhibit 19.**  
7 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
8 with the addition of the TLD .mobi which is a descriptive term that relates to Pragmatic  
9 Play’s online services. The website to which the domain resolves includes pay-per-click  
10 advertising.

11 26. pragmaticplaydemo.info is an Internet domain name which according to the  
12 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
13 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
14 identity and location. A copy of the domain name registration record is attached hereto as  
15 **Exhibit 20.** The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
16 PLAY mark with the addition of the descriptive term “demo” and the TLD .info, both of  
17 which relate to Pragmatic Play’s online gaming services. The website to which the domain  
18 resolves includes pay-per-click advertising.

19 27. pragmaticplays.info is an Internet domain name which, according to the WhoIs  
20 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
21 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
22 location. A copy of the domain name registration record is attached hereto as **Exhibit 21.**  
23 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
24 pluralized, with the addition of the TLD .info which is a descriptive term that relates to  
25 Pragmatic Play’s online services.

26 28. pragmaticplayslot.biz is an Internet domain name which, according to the  
27 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
28 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its

1 identity and location. A copy of the domain name registration record is attached hereto as  
2 **Exhibit 22**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
3 PLAY mark with the addition of the descriptive term “slot” which relates to Pragmatic  
4 Play’s online gaming services, and the TLD .biz.

5 29. pragmaticplayslot.club is an Internet domain name which, according to the  
6 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
7 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
8 identity and location. A copy of the domain name registration record is attached hereto as  
9 **Exhibit 23**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
10 PLAY mark with the addition of the descriptive term “slot” which relates to Pragmatic  
11 Play’s online gaming services, and the TLD .club.

12 30. ppgamescenter.click is an Internet domain name which, according to the WhoIs  
13 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
14 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
15 location. A copy of the domain name registration record is attached hereto as **Exhibit 24**.  
16 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
17 addition of the descriptive term “center” and the TLD .click, both of which relate to  
18 Pragmatic Play’s online gaming services.

19 31. ppgames-center.click is an Internet domain name which, according to the  
20 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
21 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
22 identity and location. A copy of the domain name registration record is attached hereto as  
23 **Exhibit 25**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
24 with the addition of a hyphen, the descriptive term “center,” and the TLD .click, which relate  
25 to Pragmatic Play’s online gaming services.

26 32. ppgames-hub.click is an Internet domain name which, according to the WhoIs  
27 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
28 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and

1 location. A copy of the domain name registration record is attached hereto as **Exhibit 26**.  
2 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
3 addition of a hyphen, the descriptive term “hub,” and the TLD .click, which relate to  
4 Pragmatic Play’s online gaming services.

5 33. ppgameshub-tr.click is an Internet domain name which, according to the WhoIs  
6 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
7 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
8 location. A copy of the domain name registration record is attached hereto as **Exhibit 27**.  
9 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
10 addition of a hyphen, the lettering “TR” which is an abbreviation of the geographically  
11 descriptive term “Turkey,” and the descriptive term “hub” and the TLD .click which relate  
12 to Pragmatic Play’s online gaming services.

13 34. ppgameshub-trk.click is an Internet domain name which, according to the  
14 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
15 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
16 identity and location. A copy of the domain name registration record is attached hereto as  
17 **Exhibit 28**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
18 with the addition of a hyphen, the lettering “TRK” which is an abbreviation of the  
19 geographically descriptive term “Turkey,” and the descriptive term “hub” and the TLD  
20 .click which relate to Pragmatic Play’s online gaming services.

21 35. ppgames-hubtrk.click is an Internet domain name which, according to the  
22 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
23 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
24 identity and location. A copy of the domain name registration record is attached hereto as  
25 **Exhibit 29**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
26 with the addition of a hyphen, the lettering “TRK” which is an abbreviation of the  
27 geographically descriptive term “Turkey,” and the descriptive term “hub” and the TLD  
28 .click which relate to Pragmatic Play’s online gaming services.

1           36. ppgameshub-tur.click is an Internet domain name which, according to the  
2 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
3 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
4 identity and location. A copy of the domain name registration record is attached hereto as  
5 **Exhibit 30**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
6 with the addition of a hyphen, the lettering “TUR” which is an abbreviation of the  
7 geographically descriptive term “Turkey,” and the descriptive term “hub” and the TLD  
8 .click which relate to Pragmatic Play’s online gaming services.

9           37. ppgameshub-turk.click is an Internet domain name which, according to the  
10 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
11 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
12 identity and location. A copy of the domain name registration record is attached hereto as  
13 **Exhibit 31**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
14 with the addition of a hyphen, the lettering “TURK” which is an abbreviation of the  
15 geographically descriptive term “Turkey,” and the descriptive term “hub” and the TLD  
16 .click which relate to Pragmatic Play’s online gaming services.

17           38. ppgames-hubturk.click is an Internet domain name which, according to the  
18 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
19 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
20 identity and location. A copy of the domain name registration record is attached hereto as  
21 **Exhibit 32**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
22 with the addition of a hyphen, the lettering “TURK” which is an abbreviation of the  
23 geographically descriptive term “Turkey,” and the descriptive term “hub” and the TLD  
24 .click which relate to Pragmatic Play’s online gaming services.

25           39. ppgames-net.click is an Internet domain name which, according to the WhoIs  
26 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
27 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
28 location. A copy of the domain name registration record is attached hereto as **Exhibit 33**.

1 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
2 addition of a hyphen, the descriptive term “net,” and the TLD .click, both of which relate to  
3 Pragmatic Play’s online gaming services.

4 40. ppgames-new.click is an Internet domain name which, according to the WhoIs  
5 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
6 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
7 location. A copy of the domain name registration record is attached hereto as **Exhibit 34**.  
8 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
9 addition of a hyphen, the descriptive term “new,” and the TLD .click, both of which relate  
10 to Pragmatic Play’s online gaming services.

11 41. ppgames-spot.click is an Internet domain name which, according to the WhoIs  
12 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
13 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
14 location. A copy of the domain name registration record is attached hereto as **Exhibit 35**.  
15 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
16 addition of a hyphen, the descriptive term “spot,” and the TLD .click, both of which relate  
17 to Pragmatic Play’s online gaming services.

18 42. ppgamestr.click is an Internet domain name which, according to the WhoIs  
19 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
20 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
21 location. A copy of the domain name registration record is attached hereto as **Exhibit 36**.  
22 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
23 addition of the lettering “TR” which is an abbreviation of the geographically descriptive  
24 term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online gaming services.

25 43. ppgames-tr.click is an Internet domain name which, according to the WhoIs  
26 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
27 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
28 location. A copy of the domain name registration record is attached hereto as **Exhibit 37**.

1 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
2 addition of a hyphen, the lettering “TR” which is an abbreviation of the geographically  
3 descriptive term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online  
4 gaming services.

5 44. ppgamestrk.click is an Internet domain name which, according to the WhoIs  
6 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
7 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
8 location. A copy of the domain name registration record is attached hereto as **Exhibit 38**.

9 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
10 addition of the lettering “TRK” which is an abbreviation of the geographically descriptive  
11 term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online gaming services.

12 45. ppgames-trk.click is an Internet domain name which, according to the WhoIs  
13 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
14 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
15 location. A copy of the domain name registration record is attached hereto as **Exhibit 39**.

16 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
17 addition of a hyphen, the lettering “TRK” which is an abbreviation of the geographically  
18 descriptive term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online  
19 gaming services.

20 46. ppgamestur.click is an Internet domain name which, according to the WhoIs  
21 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
22 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
23 location. A copy of the domain name registration record is attached hereto as **Exhibit 40**.

24 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
25 addition of the lettering “TUR” which is an abbreviation of the geographically descriptive  
26 term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online gaming services.

27 47. ppgames-tur.click is an Internet domain name which, according to the WhoIs  
28 registration data, is registered with the registrar Namecheap to an unidentified person/entity

1 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
2 location. A copy of the domain name registration record is attached hereto as **Exhibit 41**.  
3 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
4 addition of a hyphen, the lettering “TUR” which is an abbreviation of the geographically  
5 descriptive term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online  
6 gaming services.

7 48. ppgamesturk.click is an Internet domain name which, according to the WhoIs  
8 registration data, is Withheld for Privacy ehf with the registrar Namecheap to an unidentified  
9 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
10 identity and location. A copy of the domain name registration record is attached hereto as  
11 **Exhibit 42**. The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark  
12 with the addition of the lettering “TURK” which is an abbreviation of the geographically  
13 descriptive term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online  
14 gaming services.

15 49. ppgames-turk.click is an Internet domain name which, according to the WhoIs  
16 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
17 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
18 location. A copy of the domain name registration record is attached hereto as **Exhibit 43**.  
19 The domain wholly incorporates Pragmatic Play’s protected PPGAMES mark with the  
20 addition of a hyphen, the lettering “TURK” which is an abbreviation of the geographically  
21 descriptive term “Turkey,” and the TLD .click which relates to Pragmatic Play’s online  
22 gaming services.

23 50. pragmaticplays.click is an Internet domain name which, according to the WhoIs  
24 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
25 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
26 location. A copy of the domain name registration record is attached hereto as **Exhibit 44**.  
27 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
28



1 pluralized, with the addition of the TLD .click which is a descriptive term that relates to  
2 Pragmatic Play's online services.

3 51. pragmaticplayslot.top is an Internet domain name which, according to the  
4 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
5 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
6 identity and location. A copy of the domain name registration record is attached hereto as  
7 **Exhibit 45**. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC  
8 PLAY mark with the addition of the descriptive term slot which relates to Pragmatic Play's  
9 online gaming services, and the superlative TLD .top. The website to which the domain  
10 resolves misrepresents itself as a Pragmatic Play slot provider, and uses Pragmatic Play's  
11 registered stylization of its mark as well as images from its copyrighted gaming software.

12 52. pragmaticplay.one is an Internet domain name which, according to the WhoIs  
13 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
14 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
15 location. A copy of the domain name registration record is attached hereto as **Exhibit 46**.  
16 The domain consists entirely of Pragmatic Play's protected PRAGMATIC PLAY mark,  
17 with the addition of the TLD .one.

18 53. pragmaticplay.rest is an Internet domain name which, according to the WhoIs  
19 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
20 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
21 location. A copy of the domain name registration record is attached hereto as **Exhibit 47**.  
22 The domain consists entirely of Pragmatic Play's protected PRAGMATIC PLAY mark,  
23 with the addition of the TLD .rest.

24 54. pragmaticplayindonesia.online is an Internet domain name which, according to  
25 the WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
26 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
27 identity and location. A copy of the domain name registration record is attached hereto as  
28 **Exhibit 48**. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC

1 PLAY mark with the addition of the geographically descriptive term “Indonesia” and the  
2 TLD .online, both of which relate to Pragmatic Play’s multi-national online services. The  
3 website to which the domain resolves includes pay-per-click advertising.

4 55. pragmaticplays.website is an Internet domain name which, according to the  
5 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
6 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
7 identity and location. A copy of the domain name registration record is attached hereto as  
8 **Exhibit 49**. The consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
9 pluralized, with the addition of the TLD .website.

10 56. pragmaticplays.biz is an Internet domain name which, according to the WhoIs  
11 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
12 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
13 location. A copy of the domain name registration record is attached hereto as **Exhibit 50**.  
14 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
15 pluralized, with the addition of the TLD .biz.

16 57. pragmaticplayslot.vip is an Internet domain name which, according to the  
17 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
18 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
19 identity and location. A copy of the domain name registration record is attached hereto as  
20 **Exhibit 51**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
21 PLAY mark with the addition of “slot” which is related to Pragmatic Play’s online gaming  
22 services, and the superlative TLD .vip.

23 58. pragmaticplay.cfd is an Internet domain name which, according to the WhoIs  
24 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
25 using the privacy service Withheld for Privacy Purposes to conceal his/her/its identity and  
26 location. A copy of the domain name registration record is attached hereto as **Exhibit 52**.  
27 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
28 with the addition of the TLD .cfd.

1           59. pragmaticplay123.xyz is an Internet domain name which, according to the  
2 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
3 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
4 identity and location. A copy of the domain name registration record is attached hereto as  
5 **Exhibit 53**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
6 PLAY mark with the addition of the arbitrary numbering “123” and the TLD .xyz. The  
7 website to which the domain resolves misuses Pragmatic Play’s registered stylization of its  
8 mark, and purports to offer online gaming services of the type Pragmatic Play offers.

9           60. pragmaticplayslot.xyz is an Internet domain name which, according to the  
10 WhoIs registration data, is registered with the registrar Namecheap to an unidentified  
11 person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its  
12 identity and location. A copy of the domain name registration record is attached hereto as  
13 **Exhibit 54**. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC  
14 PLAY mark with the addition of the descriptive term “slot” which relates to Pragmatic  
15 Play’s online gaming services, and the TLD .xyz.

16           61. pragmaticplay.win is an Internet domain name which, according to the WhoIs  
17 registration data, is registered with the registrar NameSilo to an unidentified person/entity  
18 using the privacy service PrivacyGuardian.org to conceal his/her/its identity and location. A  
19 copy of the domain name registration record is attached hereto as **Exhibit 55**. The domain  
20 consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark, with the addition  
21 of the TLD .win which relates to Pragmatic Play’s online gaming services.

22           62. pragmaticplay.today is an Internet domain name which, according to the WhoIs  
23 registration data, is registered with the registrar GoDaddy to an unidentified person/entity  
24 using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and  
25 location. A copy of the domain name registration record is attached hereto as **Exhibit 56**.  
26 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
27 with the addition of the TLD .today. The website to which the domain resolves includes pay-  
28 per-click advertising.

1 63. pragmaticplay.ink is an Internet domain name which, according to the WhoIs  
2 registration data, is registered with the registrar Namecheap to an unidentified person/entity  
3 using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and  
4 location. A copy of the domain name registration record is attached hereto as **Exhibit 57**.  
5 The domain consists entirely of Pragmatic Play’s protected PRAGMATIC PLAY mark,  
6 with the addition of the TLD .ink.

7 **JURISDICTION, VENUE AND JOINDER**

8 64. This is a civil action for federal cybersquatting in violation of the Anti-  
9 Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

10 65. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C.  
11 §§ 1331 and 1338(a).

12 66. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant  
13 to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. §  
14 1125(d)(2)(A)(ii) because there is either no registrant field in the WhoIs record for the  
15 Defendant Domain Names, or where there is a registrant field, that field reflects a privacy  
16 service or, a fictitious person/entity, and/or an individual residing outside the United States,  
17 and therefore Pragmatic Play cannot obtain in personam jurisdiction over a person who  
18 would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) and/or  
19 Pragmatic Play, despite its due diligence, has been unable to find a person who would have  
20 been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

21 67. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa), Pragmatic Play will give  
22 notice of the violations of its rights, and its intent to proceed *in rem*, to the contact addresses  
23 set forth in the registration records for each of the Defendant Domain Names.

24 68. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that  
25 the registry operators and/or registrars for each of the Defendant Domain Names are situated  
26 in this judicial district. All of the Defendant Domain Names are registered with the registrars  
27 NameCheap, Inc., GoDaddy.com, LLC, or NameSilo, LLC, and/or the domains are  
28

1 maintained by the domain registry Registry Services, LLC (e.g., domain names with the top-  
2 level domains .biz, .club, and .vip), all of which are located in Arizona.

3 69. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P.  
4 20(a)(2) in that the *in rem* cybersquatting claim set forth herein appears to arise out of the  
5 same series of transactions and the same questions of law are common to all of the Defendant  
6 Domain Names. Specifically, each of the Defendant Domain Names incorporates Pragmatic  
7 Play’s protected PRAGMATIC PLAY and PPGAMES Marks either on their own or  
8 combined with a term that lacks identifying function. The Defendant Domain Names also  
9 use common privacy services to shield the registrant’s identity and resolve to similar  
10 websites that are related to or directly infringe the gaming services offered by Pragmatic  
11 Play.

### 12 PRAGMATIC PLAY’S RIGHTS

13 70. Tamaris (Gibraltar) Limited, operating Pragmatic Play, is the proprietor of  
14 Pragmatic Play’s intellectual property which encompasses trademarks and other assets.  
15 Pragmatic Play is a leading developer and provider of mobile and desktop casino games for  
16 the online gaming industry.

17 71. Since 2016, Pragmatic Play has been actively and continuously developing,  
18 offering, and supplying a wide range of games under the PRAGMATIC PLAY and  
19 PPGAMES trademarks (collectively, the “PRAGMATIC PLAY and PPGAMES Marks”)  
20 to operators in various jurisdictions.

21 72. The PRAGMATIC PLAY mark is often used as a word mark and displayed as  
22 plain text. At times, the PRAGMATIC PLAY mark is displayed in a stylized form with a  
23 design, as shown below:



27 Pragmatic Play has consistently used this composite mark in association with its gaming  
28 services for several years.

1           73. Since receiving its first license in 2016, Pragmatic Play has acquired licenses  
2 in numerous regulated markets.

3           74. Pragmatic Play offers an array of games under the PRAGMATIC PLAY mark,  
4 including online slot games, live casino games, bingo, and sports betting. These services are  
5 all available to U.S. citizens abroad, and a subset of the services are made available by social  
6 casino operators in select states in the U.S in accordance with applicable state and federal  
7 laws.

8           75. Pragmatic Play has actively participated in marketing activities such as year-  
9 round PR campaigns that ensure brand momentum, paid and earned content marketing  
10 including webinars, feature stories, and interviews, paid advertising including display  
11 banners and newsletter sponsorship, virtual events including EGR Awards, Sigma Virtual  
12 and SBC Virtual, social media including LinkedIn, Twitter, Facebook, and Instagram, and  
13 constant recognition as a leading supplier across tier-I industry awards. All of these efforts  
14 prominently feature the PRAGMATIC PLAY mark.

15           76. On October 29, 2014, Pragmatic Play registered the domain name  
16 PragmaticPlay.com. Pragmatic Play began publishing gaming content through use of the  
17 PRAGMATIC PLAY mark on its websites in 2015. Pragmatic Play's websites are  
18 internationally accessible, including within the United States.

19           77. On June 7, 2021, Pragmatic Play registered the domain PPGames.net.

20           78. For over two years, Pragmatic Play has used the domain PPGames.net as its  
21 official API domain.

22           79. Pragmatic Play hosts administrative websites at  
23 backoffice.ppgames.net/admin, using the PPGAMES mark.

24           80. Pragmatic Play also uses the PPGAMES mark to promote its online casino  
25 games via advertisements on social media.

26           81. As a result of Pragmatic Play's efforts, the PPGAMES mark has become  
27 affiliated with Pragmatic Play's business operations and promotion of Pragmatic Play's  
28 games.

1           82. Consumers have come to distinguish and recognize the legitimacy of Pragmatic  
2 Play’s services as a result of the use and widespread promotion of the PRAGMATIC PLAY  
3 and PPGAMES Marks.

4           83. Likely due to the financial elements of online gaming, Pragmatic Play is  
5 constantly combatting malicious third parties’ attempts to misuse the PRAGMATIC PLAY  
6 and PPGAMES Marks to confuse, mislead, and/or deceive consumers. To protect both its  
7 consumers and its valuable marks, Pragmatic Play has engaged in significant enforcement  
8 efforts relating to its intellectual property. Its efforts include defensive domain name  
9 registrations, administrative proceedings under the Uniform Domain Name Dispute  
10 Resolution Policy, take-down notices, and anti-cybersquatting actions, including litigation  
11 in this Court. *See PragmaticPlay Int’l Ltd. v. Agenpragmaticplay.live*, No. 2:23-cv-497 (D.  
12 Ariz. Mar. 23, 2023); *PragmaticPlay International Ltd. v. Agen-pragmaticplay.org*, No.  
13 1:23-cv-174 (E.D. Va. Feb. 7, 2023); *PragmaticPlay Int’l Ltd. v. 51ppgame.com*, No. 1:22-  
14 cv-1016 (E.D. Va. Sept. 8, 2022); *PragmaticPlay Int’l Ltd. v. 789pragmaticplay.com*, No.  
15 1:22-cv-835 (E.D. Va. July 22, 2022).<sup>1</sup>

16           84. Based on Pragmatic Play’s extensive use and promotion of the PRAGMATIC  
17 PLAY and PPGAMES Marks, and the recognition and goodwill the marks have achieved in  
18 the eyes of the consuming public, the PRAGMATIC PLAY and PPGAMES Marks are  
19 distinctive and/or famous, and are entitled to broad common law trademark rights.

20           85. The Defendant Domain Names represent unauthorized colorable imitations of  
21 the PRAGMATIC PLAY and/or PPGAMES Marks, which further demonstrates that the  
22 PRAGMATIC PLAY and PPGAMES Marks have acquired distinctiveness and were  
23 famous and/or distinctive prior to the time of registration of the Defendant Domain Names.  
24 The PRAGMATIC PLAY and PPGAMES Marks have no significance outside being a  
25 source identifier for Pragmatic Play’s products and services. By choosing to register  
26

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27 <sup>1</sup> Past actions asserting these trademark rights have been brought by PragmaticPlay International  
28 Ltd. as the plaintiff. In 2023, Pragmatic Play underwent corporate restructuring, during which the  
trademark rights and that portion of the business to which the rights pertained were transferred to  
Tamaris (Gibraltar) Limited.



1 domains incorporating the PRAGMATIC PLAY and/or PPGAMES Marks, the registrant(s)  
2 of the Defendant Domain Names have recognized that source-indicating significance, and  
3 are seeking to leverage it for their own gain.

4 86. In addition to its common law trademark rights, Pragmatic Play possesses  
5 statutory rights in the PRAGMATIC PLAY mark by virtue of its ownership of U.S.  
6 trademark registrations for both the PRAGMATIC PLAY word mark and composite mark,  
7 directed to “[e]ntertainment services, namely, providing games of chance via the Internet,”  
8 U.S. Reg. Nos. 6848492, 6890979. Copies of these registrations are attached as **Exhibit 58**.

9 87. Plaintiff possesses statutory rights in the PPGAMES mark by virtue of its  
10 ownership of a U.S. trademark registration for the PLAY PPGAMES mark directed to the  
11 following:

12 Downloadable computer gaming software; Computer hardware for games  
13 and gaming; downloadable computer application software featuring games  
14 and gaming; downloadable computer software for the administration of on-  
15 line games and gaming; downloadable gaming software that generates or  
16 displays wager outcomes of gaming machines; downloadable interactive  
17 game software; Downloadable computer games; Downloadable video game  
18 software; downloadable interactive computer game programs; downloadable  
19 computer games programs; downloadable interactive multimedia computer  
20 game programs; Gaming machines; Gaming machines for gambling; Slot  
21 machines; Gaming machines, namely, devices which accept a wager;  
22 Machines for playing games of skill or chance; Providing on-line information  
23 in the field of computer gaming entertainment; Information relating to  
24 computer gaming entertainment provided online from a computer database  
25 or a global communication network; Online gaming services in the nature of  
26 providing games of chance via the internet; Providing online computer  
27 games; Providing online video games; Provision of online computer games;  
28 Provision of online information in the field of computer games

1 entertainment; Provision of an online magazine featuring information in the  
2 field of computer games; Conducting multiple player games of chance via  
3 the internet; Video game entertainment services, namely, providing online  
4 video games; Providing an online computer game; On-line gambling services  
5 in the nature of providing games of chance via the internet; Providing  
6 temporary use of online non-downloadable computer gaming software;  
7 providing temporary use of online non-downloadable computer application  
8 software for games and gaming; providing temporary use of online non-  
9 downloadable computer software for the administration of on-line games and  
10 gaming; providing temporary use of online non-downloadable gaming  
11 software that generates or displays wager outcomes of gaming machines;  
12 providing temporary use of online non-downloadable computer game  
13 programs.”

14 U.S. Reg. No. 7186621, copy attached as **Exhibit 59**.

15 88. Plaintiff also owns a pending U.S. trademark application for the PPGAMES  
16 mark, U.S. Serial No. 97450360.

### 17 **UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES**

18 89. The Defendant Domain Names all reflect wholesale incorporations of the  
19 PRAGMATIC PLAY and PPGAMES Marks, with minor variations such as pluralizations,  
20 or additions of descriptive terms (e.g., geographically descriptive terms like “Indonesia,” or  
21 terms descriptive of Pragmatic Play’s online services like “demo,” “hub,” “slot,” or  
22 “center”).

23 90. Upon information and belief, the Defendant Domain Names were registered for  
24 the purpose of, *inter alia*, obtaining Internet visitors when such visitors were attempting to  
25 reach Pragmatic Play’s services.

26 91. The Defendant Domain Names have been configured to display pay-per-click  
27 advertisements, to download malware or bloatware, for email services that could be used to  
28 impersonate Pragmatic Play, or to resolve to websites that display unauthorized copies

1 and/or simulations of Pragmatic Play's intellectual property to mislead viewers into  
2 believing the site is affiliated with Pragmatic Play.

3 92. The registrant(s) of the Defendant Domain Names profit from their use of the  
4 PRAGMATIC PLAY and PPGAMES Marks by, *inter alia*: (a) receiving compensation  
5 when Internet visitors, who were attempting to reach Pragmatic Play's services, click on a  
6 link provided by a Defendant Domain Name to a third-party website and/or when the  
7 Internet visitors are automatically redirected by a Defendant Domain Name to a third-party  
8 website for a sales solicitation; (b) receiving compensation when Internet visitors, often  
9 unknowingly, download and install a computer virus from a website displayed at the  
10 Defendant Domain Names; (c) using the Defendant Domain Names to send email for the  
11 purpose of unlawful impersonation of Pragmatic Play; and (d) diverting consumers away  
12 from legitimate Pragmatic Play offerings to other gaming services including pirated  
13 Pragmatic Play software or imitations thereof, and/or defraud consumers who are misled  
14 into believing that they are providing funds to engage in online gaming.

15 93. The aforementioned use of the PRAGMATIC PLAY and PPGAMES Marks  
16 within the Defendant Domain Names and/or associated websites is without authorization  
17 from Pragmatic Play.

18 94. Upon information and belief, the Defendant Domain Names do not and cannot  
19 reflect the legal name of the registrant(s) of the Domain Names.

20 95. Upon information and belief, the registrant(s) of the Defendant Domain Names  
21 have not engaged in bona fide commercial use of the PRAGMATIC PLAY and PPGAMES  
22 Marks in a website accessible under the Domain Names, and are instead attempting to  
23 misrepresent themselves as Pragmatic Play or affiliates thereof.

24 96. Upon information and belief, the registrant(s) of the Defendant Domain Names  
25 have not engaged in bona fide noncommercial or fair use of the PRAGMATIC PLAY and  
26 PPGAMES Marks in a website accessible under the Domain Names.

27 97. The websites displayed by the registrant(s) of the Defendant Domain Names  
28 are likely to be confused with Pragmatic Play's legitimate online locations.

1 98. Upon information and belief, the registrant(s) of the Defendant Domain Names  
2 registered the Defendant Domain Names with intent to divert consumers away from  
3 Pragmatic Play’s online locations, for commercial gain, by creating a likelihood of  
4 confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain  
5 Names and the sites displayed through use of the Defendant Domain Names.

6 99. Upon information and belief, the registrant(s) of the Defendant Domain Names  
7 provided material and misleading false contact information when applying for and  
8 maintaining the registration of the Defendant Domain Names in that the person or entity  
9 identified as the registrant of the Defendant Domain Names is not the true owner of the  
10 Domain Names.

11 100. Upon information and belief, the registrant(s) of certain of the Defendant  
12 Domain Names use services that replace a domain name owner’s contact information with  
13 names such as “REDACTED FOR PRIVACY,” or the WhoIs records contain no registrant  
14 name field, and thereby conceal the identity of the true owner(s) of the domain name.

15 101. Upon information and belief, if the Defendant Domain Names were registered  
16 by different people or entities, the registrants of the Defendant Domain Names acted in  
17 concert given that groups of Defendant Domain Names were registered on the same date,  
18 have been registered with the same registrar, and/or resolve to reflect similar unlawful  
19 content. See Exs. 1-57.

20 **COUNT ONE:**

21 **(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)**

22 102. Pragmatic Play repeats and realleges each and every allegation set forth in the  
23 foregoing paragraphs, as though fully set forth herein.

24 103. Pragmatic Play’s PRAGMATIC PLAY and PPGAMES Marks are famous  
25 and/or distinctive and were famous and/or distinctive prior to the time of registration of the  
26 Defendant Domain Names.

27 104. The aforesaid acts by the registrant(s) of the Defendant Domain Names  
28 constitute registration, maintenance, trafficking in, and/or use of domain names that are

1 confusingly similar to Pragmatic Play’s PRAGMATIC PLAY and PPGAMES Marks, with  
2 bad faith intent to profit therefrom.

3 105. In light of the registrant’s concealment of the identities of the true owners of  
4 the Defendant Domain Names and/or the registrant’s location outside the United States,  
5 Pragmatic Play is not able to obtain in personam jurisdiction over the registrant(s) of the  
6 Defendant Domain Names or any other person who would have been a defendant in a civil  
7 action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, Pragmatic Play, despite its due  
8 diligence, has been unable to find a person who would have been a defendant in a civil action  
9 under 15 U.S.C. § 1125(d)(1)(A).

10 106. The aforesaid acts by the registrant(s) of the Domain Names constitutes  
11 unlawful cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15  
12 U.S.C. § 1125(d)(1).

13 107. The aforesaid acts have caused, and are causing, great and irreparable harm to  
14 Pragmatic Play and the public. The harm to the public includes the potential for fraud  
15 stemming from these domains that are intended to mislead consumers into assuming an  
16 association with Pragmatic Play. The harm to Pragmatic Play includes harm to the value and  
17 goodwill associated with the PRAGMATIC PLAY and PPGAMES Marks that money  
18 cannot compensate. Unless permanently restrained and enjoined by this Court, said  
19 irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), Pragmatic  
20 Play is entitled to an order directing the current registrars of the Defendant Domain Names  
21 to be changed by the registries to Pragmatic Play’s registrar of choice and directing the  
22 registrant(s) to be changed to Pragmatic Play.

23 **PRAYER FOR RELIEF**

24 **WHEREFORE**, Pragmatic Play respectfully requests of this Court:

25 1. That judgment be entered in favor of Pragmatic Play on its claim of  
26 cybersquatting.

27 2. That the Court order the domain registries for the Defendant Domain Names to  
28 change the registrars for the Defendant Domain Names to Pragmatic Play’s registrar of

1 choice and that the domain registrars for the Defendant Domain Names change of the  
2 registrant(s) to Pragmatic Play.

3 3. That the registrar of any other domain names registered by the registrant(s) of  
4 the Defendant Domain Names that resemble or include the PRAGMATIC PLAY and  
5 PPGAMES Marks be replaced with Pragmatic Play's registrar of choice and that such  
6 registrar change the registrant(s) to Pragmatic Play.

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

9 5. That the Court order an award to Pragmatic Play of such other and further relief  
10 as the Court may deem just and proper.

11 RESPECTFULLY SUBMITTED this 3rd day of January, 2024.

12 **THORPE SHWER, P.C.**

13  
14 By /s/ Sara R. Witthoft  
15 William L. Thorpe  
16 Sara R. Witthoft

17 &

18 **WILEY REIN LLP**

19 By /s/ David E. Weslow  
20 David E. Weslow (application for  
21 admission *pro hac vice* forthcoming)  
22 Adrienne J. Kosak (application for  
23 admission *pro hac vice* forthcoming)

24 *Attorneys for Plaintiff*  
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