

Dreyfus & associés Paris - Lyon - Strasbourg

78 avenue Raymond Poincaré 75116 Paris - France T.: +33 (0)1 44 70 07 04 F.: +33 (01) 40 06 99 64 contact@dreyfus.fr www.dreyfus.fr

SARL au capital de 388 400 € RCS Paris B 453 207 383 Code NAF : 6910Z TVA : FR 30 453 207 383 Ning Bo Shi Zhen Hai 9D new media design Co.,Ltd. ning bo shi zhen hai qu zhao bao shan jie dao ping hai lu 1188 hao 315200 Ning Bo Shi CHINE

Attention to: Ma Xian Chun

Paris, April 25, 2018

Via registered letter and email

To: <u>3569552836@qq.com</u>

Re: Domain name <novotel.online> O/Ref:F1667OPND3419/EH/FMA/SPI

Dear Sir,

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

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

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

Our client has become aware of the registration of the domain name <novotel.online> which reproduces entirely our client's trademark NOVOTEL.

To the best of our knowledge, our client has never granted you any authorization to use its trademark NOVOTEL and to register the domain name <novotel.online>.



Therefore, the registration of the said domain name appears to constitute free riding.

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

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

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

We remain at the disposal of your legal advisor.

Yours faithfully,

Nathalie Dreyfus