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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF ARIZONA

13 True Names, Ltd. d/b/a Ethereum Name
14 Service, a Singapore corporation, and Virgil
15 Griffith, an individual,

No. 2:22-CV-01494-JJT
ANSWER

16 Plaintiffs,

17 v.

18 GoDaddy, Inc., a Delaware corporation,
19 GoDaddy.com LLC, a Delaware
20 corporation, Dynadot LLC, a California
21 corporation, and Manifold Finance, Inc., a
22 Delaware corporation,

23 Defendants.

24 Defendant, Dynadot, LLC (“Dynadot”) files its Answer to Plaintiffs’ Amended
25 Complaint.

INTRODUCTION

26 1. Dynadot is without knowledge or information sufficient to form a belief as to
the truth of the allegations in paragraph 1 and therefore denies each and every such
allegation.

2. Dynadot is without knowledge or information sufficient to form a belief as to
the truth of the allegations in paragraph 2 and therefore denies each and every such
allegation.

1 3. Dynadot admits only the factual averments in paragraph 3 as to the syncing
2 of the domain names and internet protocol addresses and the Domain Name System. As to
3 the remainder of the allegations, Dynadot is without knowledge or information sufficient to
4 form a belief as to the truth of the remaining allegations in paragraph 3 and therefore denies
5 each and every such allegation.

6 4. Dynadot is without knowledge or information sufficient to form a belief as to
7 the truth of the allegations in paragraph 4 and therefore denies each and every such
8 allegation.

9 5. Dynadot is without knowledge or information sufficient to form a belief as to
10 the truth of the allegations in paragraph 5 and therefore denies each and every such
11 allegation.

12 6. Dynadot is without knowledge or information sufficient to form a belief as to
13 the truth of the allegations in paragraph 6 and therefore denies each and every such
14 allegation.

15 7. Dynadot is without knowledge or information sufficient to form a belief as to
16 the truth of the allegations in paragraph 7 and therefore denies each and every such
17 allegation.

18 8. Dynadot is without knowledge or information sufficient to form a belief as to
19 the truth of the allegations in paragraph 8 and therefore denies each and every such
20 allegation.

21 9. Dynadot is without knowledge or information sufficient to form a belief as to
22 the truth of the allegations in paragraph 9 and therefore denies each and every such
23 allegation.

24 10. Dynadot is without knowledge or information sufficient to form a belief as to
25 the truth of the allegations in paragraph 10 and therefore denies each and every such
26 allegation.

1 11. Dynadot is without knowledge or information sufficient to form a belief as to
2 the truth of the allegations in paragraph 11 and therefore denies each and every such
3 allegation.

4 12. Dynadot is without knowledge or information sufficient to form a belief as to
5 the truth of the allegations in paragraph 12 and therefore denies each and every such
6 allegation.

7 13. Dynadot is without knowledge or information sufficient to form a belief as to
8 the truth of the allegations in paragraph 13 and therefore denies each and every such
9 allegation.

10 14. Dynadot admits the allegations contained in paragraph 14.

11 15. Dynadot is without knowledge or information sufficient to form a belief as to
12 the truth of the allegations in paragraph 15 and therefore denies each and every such
13 allegation.

14 **JURISDICTION**

15 16. Dynadot admits only that it is a California company with its principal place
16 of business in California; Dynadot is without knowledge or information sufficient to form
17 a belief as to the truth of the remaining allegations in paragraph 16 and therefore denies
18 each and every remaining allegation.

19 **VENUE**

20 17. Dynadot is without knowledge or information sufficient to form a belief as to
21 the truth of the allegations in paragraph 17 and therefore denies each and every such
22 allegation.

23 **FACTUAL ALLEGATIONS**

24 18. Dynadot is without knowledge or information sufficient to form a belief as to
25 the truth of the allegations in paragraph 18 and therefore denies each and every such
26 allegation.

1 19. Dynadot is without knowledge or information sufficient to form a belief as to
2 the truth of the allegations in paragraph 19 and therefore denies each and every such
3 allegation.

4 20. Dynadot is without knowledge or information sufficient to form a belief as to
5 the truth of the allegations in paragraph 20 and therefore denies each and every such
6 allegation.

7 21. Dynadot is without knowledge or information sufficient to form a belief as to
8 the truth of the allegations in paragraph 21 and therefore denies each and every such
9 allegation.

10 22. Dynadot admits only that GoDaddy, Inc. acquired Uniregistry, Corp.
11 Dynadot is without knowledge or information sufficient to form a belief as to the truth of
12 the remainder of the allegations in paragraph 22 and therefore denies the remainder of the
13 allegations.

14 23. Dynadot is without knowledge or information sufficient to form a belief as to
15 the truth of the allegations in paragraph 23 and therefore denies each and every such
16 allegation.

17 24. Dynadot is without knowledge or information sufficient to form a belief as to
18 the truth of the allegations in paragraph 24 and therefore denies each and every such
19 allegation.

20 25. Dynadot is without knowledge or information sufficient to form a belief as to
21 the truth of the allegations in paragraph 25 and therefore denies each and every such
22 allegation.

23 26. Dynadot is without knowledge or information sufficient to form a belief as to
24 the truth of the allegations in paragraph 26 and therefore denies each and every such
25 allegation.

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1 27. Dynadot is without knowledge or information sufficient to form a belief as to
2 the truth of the allegations in paragraph 27 and therefore denies each and every such
3 allegation.

4 28. Dynadot is without knowledge or information sufficient to form a belief as to
5 the truth of the allegations in paragraph 28 and therefore denies each and every such
6 allegation.

7 29. Dynadot is without knowledge or information sufficient to form a belief as to
8 the truth of the allegations in paragraph 29 and therefore denies each and every such
9 allegation.

10 30. Dynadot is without knowledge or information sufficient to form a belief as to
11 the truth of the allegations in paragraph 30 and therefore denies each and every such
12 allegation.

13 31. Dynadot is without knowledge or information sufficient to form a belief as to
14 the truth of the allegations in paragraph 31 and therefore denies each and every such
15 allegation.

16 32. Dynadot is without knowledge or information sufficient to form a belief as to
17 the truth of the allegations in paragraph 32 and therefore denies each and every such
18 allegation.

19 33. Dynadot denies that it purported to have purchased the domain from
20 GoDaddy. Dynadot is without knowledge or information sufficient to form a belief as to
21 the truth of the remainder of the allegations in paragraph 33 and therefore denies the
22 remainder of the allegations.

23 34. Dynadot denies the allegations contained in paragraph 34.

24 35. Dynadot is without knowledge or information sufficient to form a belief as to
25 the truth of the allegations in paragraph 35 and therefore denies each and every such
26 allegation.

1 43. Dynadot is without knowledge or information sufficient to form a belief as to
2 the truth of the allegations in paragraph 43 and therefore denies each and every such
3 allegation.

4 44. Dynadot is without knowledge or information sufficient to form a belief as to
5 the truth of the allegations in paragraph 44 and therefore denies each and every such
6 allegation.

7 45. Dynadot is without knowledge or information sufficient to form a belief as to
8 the truth of the allegations in paragraph 45 and therefore denies each and every such
9 allegation.

10 **SECOND CLAIM FOR RELIEF**

11 **(Breach of the Covenant of Good Faith and Fair Dealing as to GoDaddy Defendants)**

12 46. Paragraph 46 is duplicative and Dynadot incorporates by reference all of its
13 preceding admissions and denials to the corresponding duplicative paragraphs respectively.

14 47. Dynadot is without knowledge or information sufficient to form a belief as to
15 the truth of the allegations in paragraph 47 and therefore denies each and every such
16 allegation.

17 48. Dynadot denies that it played any role in Plaintiffs' alleged attempts to renew
18 the domain name while it was registered with GoDaddy, or that Dynadot possessed the
19 power to impact renewal efforts, if any, during that time period. Dynadot is without
20 knowledge or information sufficient to form a belief as to the truth of the allegations in
21 paragraph 48 and therefore denies each and every such allegation.

22 49. Dynadot denies that it played any role in Plaintiffs' alleged attempts to renew
23 the domain name while it was registered with GoDaddy, or that Dynadot possessed the
24 power to impact renewal efforts, if any, during that time period. Dynadot is without
25 knowledge or information sufficient to form a belief as to the truth of the allegations in
26 paragraph 49 and therefore denies each and every such allegation.

1 50. Dynadot denies that it played any role in Plaintiffs' alleged attempts to renew
2 the domain name while it was registered with GoDaddy, or that Dynadot possessed the
3 power to impact renewal efforts, if any, during that time period. Dynadot is without
4 knowledge or information sufficient to form a belief as to the truth of the allegations in
5 paragraph 50 and therefore denies each and every such allegation.

6 51. Dynadot is without knowledge or information sufficient to form a belief as to
7 the truth of the allegations in paragraph 51 and therefore denies each and every such
8 allegation.

9 52. Dynadot is without knowledge or information sufficient to form a belief as to
10 the truth of the allegations in paragraph 52 and therefore denies each and every such
11 allegation.

12 **THIRD CLAIM FOR RELIEF**

13 **(Intentional Interference with Prospective Economic Advantage as to All Defendants)**

14 53. Paragraph 53 is duplicative and Dynadot incorporates by reference all of its
15 preceding admissions and denials to the corresponding duplicative paragraphs respectively.

16 54. Dynadot is without knowledge or information sufficient to form a belief as to
17 the truth of the allegations in paragraph 54 and therefore denies each and every such
18 allegation.

19 55. Dynadot denies the allegations in paragraph 55 as to Dynadot. Dynadot is
20 without knowledge or information sufficient to form a belief as to the truth of the remainder
21 of the allegations in paragraph 55 and therefore denies each and every such allegation.

22 56. Dynadot denies the allegations in paragraph 56 as to Dynadot. Dynadot is
23 without knowledge or information sufficient to form a belief as to the truth of the remainder
24 of the allegations in paragraph 56 and therefore denies each and every such allegation.

25 57. Dynadot denies the allegations in paragraph 57 as to Dynadot, and denies
26 that it is liable to Plaintiffs on any basis.

1 58. Dynadot denies the allegations in paragraph 58 as to Dynadot, and denies that
2 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
3 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 58
4 and therefore denies each and every such allegation.

5 59. Dynadot denies the allegations in paragraph 59 as to Dynadot, and denies that
6 it is liable to Plaintiffs on any basis, and further denies that Plaintiffs have no adequate
7 remedy at law related to its allegations against Dynadot. Dynadot is without knowledge or
8 information sufficient to form a belief as to the truth of the remainder of the allegations in
9 paragraph 59 and therefore denies each and every such allegation.

10 60. Dynadot denies the allegations in paragraph 60 as to Dynadot, and denies that
11 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
12 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 60
13 and therefore denies each and every such allegation.

14 **FOURTH CLAIM FOR RELIEF**

15 **(Unfair Competition as to all Defendants)**

16 61. Paragraph 61 is duplicative and Dynadot incorporates by reference all of its
17 preceding admissions and denials to the corresponding duplicative paragraphs respectively.

18 62. Dynadot is without knowledge or information sufficient to form a belief as to
19 the truth of the allegations in paragraph 62 and therefore denies each and every such
20 allegation.

21 63. Dynadot is without knowledge or information sufficient to form a belief as to
22 the truth of the allegations in paragraph 63 and therefore denies each and every such
23 allegation.

24 64. Dynadot is without knowledge or information sufficient to form a belief as to
25 the truth of the allegations in paragraph 64 and therefore denies each and every such
26 allegation.

1 65. Dynadot denies the allegations in paragraph 65 as to Dynadot. Dynadot is
2 without knowledge or information sufficient to form a belief as to the truth of the remainder
3 of the allegations in paragraph 65 and therefore denies each and every such allegation.

4 66. Dynadot denies the allegation that Manifold Finance purchased the domain
5 eth.link from Dynadot. Dynadot is without knowledge or information sufficient to form a
6 belief as to the truth of remainder of the allegations in paragraph 66 and therefore denies
7 each and every such allegation.

8 67. Dynadot is without knowledge or information sufficient to form a belief as to
9 the truth of the allegations in paragraph 67 and therefore denies each and every such
10 allegation.

11 68. Dynadot denies the allegations in paragraph 68 as to Dynadot. Dynadot is
12 without knowledge or information sufficient to form a belief as to the truth of the remainder
13 of the allegations in paragraph 68 and therefore denies each and every such allegation.

14 69. Dynadot denies the allegations in paragraph 69 as to Dynadot, and denies that
15 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
16 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 69
17 and therefore denies each and every such allegation.

18 70. Dynadot denies the allegations in paragraph 70 as to Dynadot, and denies that
19 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
20 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 70
21 and therefore denies each and every such allegation.

22 71. Dynadot denies the allegations in paragraph 71 as to Dynadot, and denies that
23 it is liable to Plaintiffs on any basis, and further denies that Plaintiffs have no adequate
24 remedy at law related to its allegations against Dynadot. Dynadot is without knowledge or
25 information sufficient to form a belief as to the truth of the remainder of the allegations in
26 paragraph 71 and therefore denies each and every such allegation.

FIFTH CLAIM FOR RELIEF

(Conversion as to All Defendants)

1
2
3 72. Paragraph 72 is duplicative and Dynadot incorporates by reference all of its
4 preceding admissions and denials to the corresponding duplicative paragraphs respectively.

5 73. Dynadot is without knowledge or information sufficient to form a belief as to
6 the truth of the allegations in paragraph 73 and therefore denies each and every such
7 allegation.

8 74. Dynadot denies the allegations in paragraph 74 as to Dynadot. Dynadot is
9 without knowledge or information sufficient to form a belief as to the truth of the remainder
10 of the allegations in paragraph 74 and therefore denies each and every such allegation.

11 75. Dynadot is without knowledge or information sufficient to form a belief as to
12 the truth of the allegations in paragraph 75 and therefore denies each and every such
13 allegation.

14 76. Dynadot denies the allegations in paragraph 76.

15 77. Dynadot is without knowledge or information sufficient to form a belief as to
16 the truth of the allegations in paragraph 77 and therefore denies each and every such
17 allegation.

18 78. Dynadot denies the allegations in paragraph 78 as to Dynadot, and denies that
19 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
20 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 78
21 and therefore denies each and every such allegation.

22 79. Dynadot denies the allegations in paragraph 79 as to Dynadot, and denies that
23 it is liable to Plaintiffs on any basis. Dynadot is without knowledge or information
24 sufficient to form a belief as to the truth of the remainder of the allegations in paragraph 79
25 and therefore denies each and every such allegation.

26

1 80. Dynadot denies the allegations in paragraph 80 as to Dynadot, and denies that
2 it is liable to Plaintiffs on any basis, and further denies that Plaintiffs have no adequate
3 remedy at law related to its allegations against Dynadot. Dynadot is without knowledge or
4 information sufficient to form a belief as to the truth of the remainder of the allegations in
5 paragraph 80 and therefore denies each and every such allegation.

6 **GENERAL DENIAL**

7 81. Dynadot denies each and every allegation of the complaint that is not
8 expressly admitted above.

9 **AFFIRMATIVE DEFENSES**

10 Without waiver of the right to assert any additional affirmative defenses as may be
11 revealed through discover, Dynadot asserts the following separate affirmative defenses to
12 the Plaintiffs’ Amended Complaint.

13 82. Plaintiffs’ Amended Complaint fails to state a claim upon which relief can be
14 granted.

15 83. This Court lack personal jurisdiction over Dynadot.

16 84. Venue is improper in this Court.

17 85. Failure to join an indispensable party under Fed. R. Civ. P. 19.

18 86. Plaintiffs’ claims are barred, in whole or in part, by waiver, estoppel, and/or
19 laches.

20 87. Dynadot incorporates by reference all affirmative or other defenses pled by
21 any other defendant to the fullest extent that they are applicable to them.

22 88. Defendant incorporates and hereby asserts all affirmative defenses set forth
23 in Fed. R. Civ. P. 8 and 12 as if fully set forth herein, and every other defense and legal
24 theory constituting an avoidance or defense to liability pursuant to statute or the common
25 law which may become applicable as discovery progresses in this matter. Dynadot does
26

1 not assume the burden of proving any fact, issue, or element of a claim for relief where such
2 burden properly belongs to Plaintiffs.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, having fully answered Plaintiffs' Amended Complaint, Dynadot
5 respectfully request that judgment be entered against Plaintiffs as follows:

- 6 A. That Plaintiffs' Complaint be dismissed with prejudice;
- 7 B. That Plaintiffs take nothing;
- 8 C. Awarding Dynadot its costs and attorneys' fees under A.R.S. §§ 12-341, 12-
9 341.01, 12-349, 44-404, and any other applicable statute, rule or agreement;
10 and
- 11 D. Awarding such other and further relief as the Court deems just and proper.

12 DATED this 12th day of December, 2022.

13 GALLAGHER & KENNEDY, P.A.

14
15 By: /s/ Kevin E. O'Malley
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CERTIFICATE OF SERVICE

I certify that on this 12th day of December 2022, a PDF copy of the foregoing was electronically transmitted to the Clerk of the Court using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Rona L. Miller

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