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3 (Pro hac vice granted on October 5, 2022)  
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10 *Attorneys for Plaintiff Yuming Hao*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF ARIZONA**

13 **YUMING HAO,**

14 Plaintiff,

15 v.

16 **GODADDY.COM, LLC, AND**  
17 **GO DADDY OPERATING**  
18 **COMPANY, LLC,**

19 Defendants.

20 **Civil Action No.**

21 **ORIGINAL COMPLAINT**

22 **JURY TRIAL DEMANDED**

**COMPLAINT**

1  
2 Plaintiff Yuming Hao (“Plaintiff”) files this original complaint against Defendants  
3 GoDaddy.com, LLC and Go Daddy Operating Company, LLC, (collectively,  
4 “Defendants”) and alleges as follows:  
5

6 **NATURE OF THE ACTION**

7 1. This is an action for declaratory judgment of domain name ownership  
8 arising under the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, in which Plaintiff  
9 seeks a declaratory judgment of plaintiff’s ownership of the 968.com domain name as a  
10 bona fide purchaser against Defendants.  
11

12 2. Furthermore, Plaintiff seeks a judgement that Defendants have committed  
13 the tort of conversion as Defendants, without authorization, possessed and is possessing  
14 Plaintiff’s 968.com domain name. Plaintiff also seek a judgement that Defendants  
15 tortiously interfered with a contractual relationship pursuant to the common law of the  
16 state of Arizona.  
17  
18

19 **PARTIES**

20 3. Plaintiff is an individual residing in the People’s Republic of China.

21 4. Upon information and believe, Defendant GoDaddy.com, LLC is a Delaware  
22 limited liability company with a principal place of business located at 14455 N. Hayden  
23 Road, Suite 219, Scottsdale, AZ 85260.  
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1  
2 22. Plaintiff incorporates by reference the preceding paragraphs as though fully  
3 set forth herein.

4 23. An actual and justiciable controversy exists between Plaintiff and Defendants  
5 as to whether Plaintiff is the rightful owner of the 968.com domain name as a bona fide  
6 purchaser.  
7

8 24. As a domain name registrar, Defendants do not have ownership over the  
9 968.com domain name.

10 25. As a domain name registrar, Defendants cannot refuse to transfer the  
11 968.com domain name from Chu Chu to Plaintiff.  
12

13 26. As a domain name registrar, Defendants lack authority to confiscate the  
14 968.com domain name to themselves.  
15

16 27. Defendants' express actions to wrongfully process Plaintiff's 968.com  
17 domain name without authorization and without notifying Plaintiff places the 968.com  
18 domain name solely under Defendants' dominion and control to the exclusion of Plaintiff.  
19

20 28. Defendants have not transferred the 968.com domain name to Plaintiff while  
21 knowing that Plaintiff is the rightful owner of the 968.com domain name.

22 29. Defendants' such overt activities showing it has been denying Plaintiff's  
23 ownership over the 968.com domain name.  
24

25 30. Plaintiff, Defendants, and the public will face uncertainty regarding the entity  
26 with proper title and rights to the 968.com domain name, and this reasonable apprehension  
27 of further litigation to clarify the rights at issue.  
28

1 31. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*,  
2 Plaintiff respectfully requests a declaration and judgment by this Court that he is the  
3 rightful owner of the 968.com domain name.  
4

5 **COUNT II**  
6 **CONVERSION**

7 32. Plaintiff incorporates by reference the preceding paragraphs as though fully  
8 set forth herein.

9 33. Defendants, without authorization, possessed and is possessing Plaintiff's  
10 968.com domain name.  
11

12 34. By taking the 968.com domain name from Chu Chu's account and refusing  
13 to transfer it to Plaintiff, Defendants wrongfully obtained dominion and control over  
14 Plaintiff's 968.com domain name.  
15

16 35. The 968.com domain name constitutes Plaintiff's personal property.

17 36. Plaintiff has an immediate right to possess the 968.com domain name as the  
18 lawful owner of it and its respective registration.  
19

20 37. As a result of Defendants' improper actions, Plaintiff has suffered damage in  
21 the loss of dominion and control of the 968.com domain name.

22 38. Accordingly, Defendants have committed the tort of conversion.  
23

24 **COUNT III**  
25 **INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS**

26 39. Plaintiff incorporates by reference the preceding paragraphs as though fully  
27 set forth herein.  
28

1 40. Plaintiff possessed a valid contractual relationship with Chu Chu for the  
2 968.com domain name.

3 41. Plaintiff paid Chu Chu valuable consideration for the rights associated with  
4 the 968.com domain name  
5

6 42. Defendants had express knowledge of Plaintiff's contractual rights with Chu  
7 Chu because Chu Chu had given Defendants notice of the transaction no later than July 5,  
8 2022.  
9

10 43. Defendants intentionally interfered with Plaintiff's contractual right by  
11 holding the 968.com domain name and refusing to transfer it to Plaintiff.  
12

13 44. Plaintiff did not authorize or approve Defendants' actions to hold the  
14 968.com domain name.  
15

16 45. As a result of Defendants' improper actions, Plaintiff has suffered damage in  
17 the loss of dominion and control of the 968.com domain name and the contractual rights  
18 for which he paid valuable consideration.  
19

20 **DEMAND FOR JURY TRIAL**

21 Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by  
22 jury of any issues so triable by right.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Plaintiff respectfully requests that this Court enter judgment as  
25 follows:  
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a. A declaration that Plaintiff is the rightful owner of the 968.com domain name;

b. A return of the 968.com domain name to Plaintiff’s possession, ownership, and control;

c. A judgment against Defendants and in favor of Plaintiff that Defendants have committed the tort of conversion;

d. A judgment against Defendants and in favor of Plaintiff that Defendants have intentionally interfered with Plaintiff’s contractual relations;

e. An award to Plaintiff of his actual damages, lost profits, consequential damages, exemplary damages, statutory damages, and any other damages allowable under law;

f. An award to Plaintiff of costs, expenses, and reasonable attorneys’ fees incurred in this action; and

g. Further relief as the Court may deem just and proper.

DATED October 6, 2022.

Respectfully submitted,

By: /s/ Timothy T. Wang  
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