

EXHIBIT A

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

GODADDY.COM, INC.,)	
an Arizona corporation,)	
)	Cancellation No.
Petitioner,)	
)	
v.)	
)	<u>PETITION FOR CANCELLATION</u>
PETROLIAM NASIONAL BERHAD,)	
a Federation of Malaysia corporation,)	
)	
Respondent.)	
)	
)	
)	

Re: Mark: PETRONAS AND DESIGN
 Registration No.: 2969707
 International Classes: 1, 4, 11
 Filed: December 28, 2001
 Registered: July 19, 2005

GoDaddy.com, Inc. ("Petitioner"), a corporation organized and existing under the laws of the State of Arizona, with its principal place of business at 14455 N. Hayden Rd. Suite 219, Scottsdale, AZ 85260, believes that it has been and will be damaged by the registration of the mark shown in Registration No. 2969707, and thus hereby petitions to cancel the registration.

As grounds for this Petition, Petitioner alleges that:

1. Petitioner is the world's largest domain name registrar and is accredited by the Internet Corporation for Assigned Names and Numbers ("ICANN").
2. Upon information and belief, Respondent is the national oil and gas company of Malaysia and is the record owner of federal trademark Registration No. 2969707 for the mark PETRONAS AND DESIGN (the "Registered Mark").

3. According to public records of the United States Patent and Trademark Office (“USPTO”), the current information regarding Registration No. 2969707 is as follows:

Registrant: Petroliam Nasional Berhad
Mark: PETRONAS AND DESIGN
Last listed address: Petronas Twin Towers, Tower 1
Kuala Lumpur City Centre 50088
Kuala Lumpur, Malaysia
Registration date: July 19, 2005
International Class: 001
Goods & Services: Chemicals and petrochemicals for use in the manufacture of pharmaceuticals, cosmetics, detergents, packaging, wire and cable installation, cassette tapes, pipes, toys, films, floorings, synthetic rubber, paints and coatings, adhesives, fuel additives and lubricants, textiles, agriculture, electrical and electronic components, automotive parts, aerospace and aviation, building and construction materials, plastics, foods, and diagnostic equipment; chemical and petrochemical in the nature of methanol, ethylene, methyl tertiary butyl ether (MTBE), vinyl chloride monomer, polyvinyl chloride, polyethylene, polypropylene, propylene, ethyl benzene, and styrene monomer all for use in industrial, forestry, agricultural, horticultural, and scientific applications; photographic chemicals; artificial and synthetic resins for use in the manufacture of fibers, polymers and coatings, and molding compounds; plastic molding compounds for use in plastic extrusion operations plastic molding compounds for use the manufacture of molded plastic articles and plastic sheets and films; composts; manures; fertilizers for agricultural and domestic use; glue for industrial purposes, adhesives for general industrial use, contact cements; gases for heating, lighting, steam generating, cooking, refrigeration, drying and ventilating for industrial use in liquid and gaseous forms; oil dispersants; chemicals for separating oils; hydraulic fluids for general use; chemical additives for use in the manufacture of fuels, lubricants, gasoline and drilling lubricants; drilling muds for use in oil well drilling, coolants for vehicle engines, heat transfer fluids for industrial use, hydraulic fluids for general use, acidulated water for recharging accumulators and batteries; chemical additives for use with internal combustion engines. chemical additives for fuel saving treatments, catalysts for use in the oil processing industry, oil for preservation of masonry.
International Class: 004
Goods & Services: Transmission fluids, cutting oil for industrial metalworking, Crude oil, natural gasoline, fuel oil and general purpose greases, all purpose lubricants; gasoline; fuel gas; fuel oils; fuel alcohol; diesel fuel; gas; gasoline as lubricant; kerosene, unleaded fuel; oil gas;

paraffin; petroleum; petroleum ether, fuels in liquid, gaseous and solid form, dust lying and absorbing compositions for use on unpaved roads; non-chemical additives for oils and fuels; petroleum jelly for industrial purposes, tallow, automatic transmission fluids; methanol petrochemicals for use in fuel, petroleum based dust suppressing compositions for use in manufacture

International Class: 011

Goods & Services: Air conditioners, water distillation units, flares, gas and petrol burners for industrial purposes; gas regulators, heat exchangers, heat pumps, pasteurizers for use in food and beverage industry; electric radiators not for motors or engines, solar collectors for heating solar furnaces, water filters

This registration is referred to hereinafter as the "Registration."

4. Respondent's trademark application stated Respondent's bona fide intent to use the Registered Mark in connection with each of the goods and services in the application.

5. Respondent did not, in fact, have a bona fide intent to use the Registered Mark in connection with each of the goods and services in the application.

6. Upon information and belief, Respondent has not used the Registered Mark in connection with all of the goods and services in the Registration.

7. Upon information and belief, Respondent has ceased use of the Registered Mark in connection with some or all of the goods and services in the Registration.

8. Upon information and belief, Respondent has no intent to resume use of the Registered Mark in connection with all of the goods and services in the Registration.

9. Respondent has abandoned the Registered Mark, in whole or in part.

10. Respondent applied for the Registration pursuant to Section 44 of the Lanham Act, 15 U.S.C. § 1126, claiming a registration for the Registered Mark in Respondent's country of origin.

11. Respondent was required to submit to the USPTO a registration or registrations for the Registered Mark in Respondent's country of origin, with the foreign registration(s) covering all or substantially all of the goods and services in its U.S. trademark application.

12. Respondent submitted registrations for the Registered Mark in Respondent's country of origin to the USPTO.

13. The registrations submitted by Respondent to the USPTO are considerably more limited and narrow than, and thus do not support, the Registration.

14. For the reasons above, the Registration was issued improperly and is invalid.

15. Respondent has filed a complaint against Petitioner in the United States District Court for the Northern District of California, asserting trademark-related claims based on the Registration. Respondent states in its complaint that "PETRONAS owns all right, title, and interest in U.S. Trademark No. 2969707 for 'PETRONAS.'" Respondent is seeking injunctive relief and monetary damages in this action.

16. Petitioner has been and will be damaged by Respondent's registration.

WHEREFORE, Petitioner prays that the Registration be cancelled and that this petition be sustained in favor of Petitioner.

Petitioner authorizes payment of the required filing fee of \$300.00 from its counsel's USPTO Deposit Account. Please charge the fee to Deposit Account No. 232415.

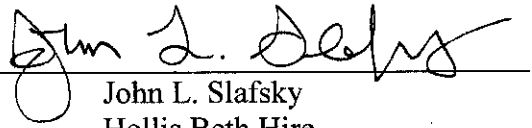
Please address all USPTO communications regarding this Petition for Cancellation to:

John L. Slafsky
Hollis Beth Hire
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, California 94304-1050
Tel: (650) 493-9300
Fax: (650) 493-6811
E-mail: trademarks@wsgr.com

Date: July 12, 2010

Respectfully Submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: 

John L. Slafsky
Hollis Beth Hire
Attorneys for Petitioner
GoDaddy.com, Inc.

CERTIFICATE OF SERVICE BY MAIL

I, Jo Ann Hylton, declare:

I am employed in Santa Clara County. I am over the age of 18 years and not a party to the within action. My business address is Wilson Sonsini Goodrich & Rosati, 650 Page Mill Road, Palo Alto, California 94304-1050.

I am readily familiar with Wilson Sonsini Goodrich & Rosati's practice for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence would be deposited with the United States Postal Service on this date.

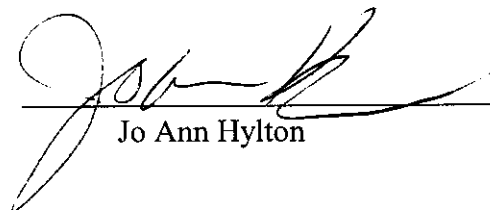
On this date, I served:

PETITION FOR CANCELLATION

on each person listed below, by placing the document described above in an envelope addressed as indicated below, which I sealed. I placed the envelope for collection and mailing with the United States Postal Service on this day, following ordinary business practices at Wilson Sonsini Goodrich & Rosati.

Brian E. Banner
Banner & Witcoff, Ltd.
1001 G. Street, NW
Washington DC 20001-4597

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Palo Alto, California on July 12, 2010.


Jo Ann Hylton

**United States Patent and Trademark Office**

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**Electronic System for Trademark Trials and Appeals****Receipt**

Your submission has been received by the USPTO.
The content of your submission is listed below.
You may print a copy of this receipt for your records.

ESTTA Tracking number: **ESTTA357404**Filing date: **07/12/2010**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Petition for Cancellation

Notice is hereby given that the following party requests to cancel indicated registration.

Petitioner Information

Name	GoDaddy.com, Inc.		
Entity	Corporation	Citizenship	Arizona
Address	14455 N. Hayden Rd., Suite 219 Scottsdale, AZ 85260 UNITED STATES		

Attorney information	John L. Slafsky and Hollis Beth Hire Wilson Sonsini Goodrich & Rosati 650 Page Mill Road Palo Alto, CA 94304-1050 UNITED STATES trademarks@wsgr.com, jslafsky@wsgr.com, hhire@wsgr.com Phone:650-493-9300		
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Registration Subject to Cancellation

Registration No	2969707	Registration date	07/19/2005
International Registration	NONE	International Registration	NONE

No.		Date	
Registrant	Petroliam Nasional Berhad Petronas Twin Towers, Tower 1 Kuala Lumpur City Centre 50088 Kuala Lumpur, MALAYSIA		

Goods/Services Subject to Cancellation

<p>Class 001.</p> <p>All goods and services in the class are cancelled, namely: Chemicals and petrochemicals for use in the manufacture of pharmaceuticals, cosmetics, detergents, packaging, wire and cable installation, cassette tapes, pipes, toys, films, floorings, synthetic rubber, paints and coatings, adhesives, fuel additives and lubricants, textiles, agriculture, electrical and electronic components, automotive parts, aerospace and aviation, building and construction materials, plastics, foods, and diagnostic equipment; chemical and petrochemical in the nature of methanol, ethylene, methyl tertiary butyl ether (MTBE), vinyl chloride monomer, polyvinyl chloride, polyethylene, polypropylene, propylene, ethyl benzene, and styrene monomer all for use in industrial, forestry, agricultural, horticultural, and scientific applications; photographic chemicals; artificial and synthetic resins for use in the manufacture of fibers, polymers and coatings, and molding compounds; plastic molding compounds for use in plastic extrusion operations plastic molding compounds for use the manufacture of molded plastic articles and plastic sheets and films; composts; manures; fertilizers for agricultural and domestic use; glue for industrial purposes, adhesives for general industrial use, contact cements; gases for heating, lighting, steam generating, cooking, refrigeration, drying and ventilating for industrial use in liquid and gaseous forms; oil dispersants; chemicals for separating oils; hydraulic fluids for general use; chemical additives for use in the manufacture of fuels, lubricants, gasoline and drilling lubricants; drilling muds for use in oil well drilling, coolants for vehicle engines, heat transfer fluids for industrial use, hydraulic fluids for general use, acidulated water for recharging accumulators and batteries; chemical additives for use with internal combustion engines; chemical additives for fuel saving treatments, catalysts for use in the oil processing industry, oil for preservation of masonry</p>
<p>Class 004.</p> <p>All goods and services in the class are cancelled, namely: Transmission fluids, cutting oil for industrial metalworking, Crude oil, natural gasoline, fuel oil and general purpose greases, all purpose lubricants; gasoline; fuel gas; fuel oils; fuel alcohol; diesel fuel; gas; gasoline as lubricant; kerosene, unleaded fuel; oil gas; paraffin; petroleum; petroleum ether, fuels in liquid, gaseous and solid form, dust lying and absorbing compositions for use on unpaved roads; non-chemical additives for oils and fuels; petroleum jelly for industrial purposes, tallow, automatic transmission fluids; methanol petrochemicals for use in fuel, petroleum based dust suppressing compositions for use in manufacture</p>
<p>Class 011.</p> <p>All goods and services in the class are cancelled, namely: Air conditioners, water distillation units, flares, gas and petrol burners for industrial purposes; gas regulators, heat exchangers, heat pumps, pasteurizers for use in food and beverage industry; electric radiators not for motors or engines, solar collectors for heating solar furnaces, water filters</p>

Grounds for Cancellation

Abandonment	Trademark Act section 14
Other	Violation of Section 44 of the Lanham Act and absence of bona fide intent.

Attachments	Petition for Cancellation.pdf (6 pages)(215738 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/John Slafsky/
Name	John L. Slafsky
Date	07/12/2010

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