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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 LAS VEGAS SANDS CORP., a Nevada
 12 corporation,
 13 Plaintiff,
 14 v.
 15 TRAFFIC LABEL LIMITED, a business
 organization of the United Kingdom,
 16 Defendant.
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**TEMPORARY RESTRAINING ORDER,
 ORDER FOR ALTERNATIVE
 SERVICE, AND ORDER SETTING
 HEARING AND BRIEFING SCHEDULE
 ON PLAINTIFF’S MOTION FOR
 PRELIMINARY INJUNCTION**

18 **UPON CONSIDERATION** of the motion filed by Plaintiff Las Vegas Sands Corp.
 19 (“LVSC”) for an *ex parte* temporary restraining order, for alternative service, and for a
 20 preliminary injunction, the supporting memorandum of points and authorities, the supporting
 21 declarations of Gayle M. Hyman and Jonathan W. Fountain, the record in this case, and for other
 22 good cause shown;

23 **THE COURT HEREBY FINDS THAT:**

24 1. LVSC will suffer irreparable injury to its valuable trademarks and associated
 25 goodwill if the Defendant is not temporarily enjoined and restrained from transferring the
 26 <lasvegassandscorp.com> domain name to other domain name registrars located outside the
 27 Court’s jurisdiction, or from transferring its registration for the <lasvegassandscorp.com>
 28 domain name to other persons or entities located outside the Court’s jurisdiction;

1 2. LVSC is likely to succeed on the merits of its claims for cybersquatting,
2 trademark infringement and false designation of origin;

3 3. The balance of hardships tips in LVSC's favor because a temporary restraining
4 order would merely place the <lasvegassandscorp.com> domain name on hold and lock pending
5 trial, and the failure to issue a temporary restraining order would cause LVSC to suffer additional
6 irreparable injury and incur additional expense if the <lasvegassandscorp.com> domain name is
7 transferred to other registrants during the pendency of this action, requiring LVSC to file
8 additional lawsuit(s) in other jurisdictions;

9 4. The issuance of a temporary restraining order is in the public interest because it
10 would protect consumers against deception and confusion arising from domain names containing
11 the Las Vegas Sands Corp. corporate name or LVSC's trademarks, and from the use of the Las
12 Vegas Sands Corp. corporate name or LVSC's trademarks, by persons other than LVSC; and

13 5. Defendant will suffer minimal damage, if any damage at all, by the issuance of a
14 temporary restraining order; accordingly, a nominal bond in the amount of \$100 is reasonable
15 security.

16 **THEREFORE, IT IS HEREBY ORDERED THAT**, pending a full trial on the merits:

17 1. GoDaddy.com, Inc. ("GoDaddy") (the domain name registrar) shall immediately
18 remove or disable the domain name server ("DNS") information for the
19 <lasvegassandscorp.com> domain name, shall place the <lasvegassandscorp.com> domain name
20 on hold and lock, and deposit it into the registry of the Court; and

21 2. Defendant, including without limitation, all of its respective partners, officers,
22 agents, servants, employees, and all other persons acting in concert or participation with
23 Defendant, are hereby temporarily restrained and enjoined from: (A) registering or trafficking in
24 any domain name containing the Las Vegas Sands Corp. corporate name or the SANDS Marks
25 or any confusingly similar variations thereof, alone or in combination with any other letters,
26 words, phrases or designs; and (B) using the Las Vegas Sands Corp. corporate name or the
27 SANDS Marks or any confusingly similar variations thereof, alone or in combination with any
28 other letters, words, letter strings, phrases or designs in commerce (including, but not limited to,

1 on any website or within any hidden text or metatags within any website).

2 **IT IS HEREBY FURTHER ORDERED THAT:**

3 1. Upon the issuance of this order, LVSC shall provide security for this temporary
4 restraining order by tendering \$100 cash to the Clerk of the Court pursuant to Local Rule 67-1;

5 2. LVSC may serve the Summons and Complaint by email to the email address
6 Defendant has maintained with GoDaddy (*i.e.*, support@trafficlabel.com), and by registered
7 mail, in lieu of any other method of service required or permitted by Rules 4 and/or 5 of the
8 Federal Rules of Civil Procedure;

9 5. LVSC may serve all other pleadings, orders, motions, notices, and papers in this
10 case upon Defendant by e-mail transmission to the email address Defendant has maintained with
11 GoDaddy (*i.e.*, support@trafficlabel.com) in lieu of any other method of service required or
12 permitted by Rules 4 and/or 5 of the Federal Rules of Civil Procedure;

13 6. The parties shall appear for hearing and oral argument on LVSC's motion for
14 preliminary injunction on July 2, 2012, at 9:00 a.m. in Courtroom 6D, at the
15 Lloyd D. George Federal Courthouse, 333 South Las Vegas Boulevard, Las Vegas, Nevada;

16 7. Defendant shall file and serve its opposition brief to LVSC's motion for
17 preliminary injunction, if any, no later than June 26, 2012; and

18 8. LVSC shall file and serve its reply brief in support of its motion for preliminary
19 injunction no later than June 29, 2012.

20 ENTERED: this 20th day of June, 2012 at 9:45 am.

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22 **UNITED STATES DISTRICT JUDGE**

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