

Complaint Transmittal Cover Sheet

To: Polina Dolginov, Respondent
From: Anna Bove, Complainant
Cc: National Arbitration Forum
Date: July 3, 2008
Re: abc-cross-stitch-patterns.com; abc-embroidery-designs.com

The attached Complaint is being filed against you with the National Arbitration Forum (the "Forum") pursuant to the Uniform Domain Name Dispute Resolution Policy (the "Policy") adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN") on October 24, 1999 and incorporated in your Registration Agreement with the Registrar of your domain name(s). By submitting this Complaint to the Forum, the Complainant agrees to abide and be bound by the provisions of the Policy, the ICANN Rules, and the Forum's Supplemental Rules.

Until you are notified by the Forum that a proceeding has commenced, you have no duty to act with regard to this Complaint

- The Forum will examine the Complaint to determine whether it conforms to the ICANN Policy, Rules, and the Supplemental Rules
- If the Complaint conforms to those standards, the Forum will forward an official copy of the Complaint to you.
- *Once the official Complaint is forwarded to you, you will have twenty (20) calendar days to submit a Response to both the Forum and the Complainant in accordance with the Policy, Rules, and Supplemental Rules.*
- You may seek legal assistance to represent you in this administrative proceeding.

The Policy and Rules governing this proceeding can be found at:

ICANN Policy <http://www.icann.org/udrp/udrp-policy-24oct99.htm>
ICANN Rules <http://www.icann.org/udrp/udrp-rules-24oct99.htm>
Forum Supplemental Rules
<http://domains.adrforum.com/main.aspx?itemID=631&hideBar=False&navID=237&news=26>

Alternatively, you may contact the Forum to obtain any of the above documents

Telephone: (800) 474-2371 or (952) 516-6400
E-mail: domaindispute@adrforum.com

Please provide the Forum with the contact information (mailing address, e-mail address, telephone number) where the official Complaint and other communications in the administrative proceeding should be sent.

IN THE NATIONAL ARBITRATION FORUM

ANNA BOVE
2100 East 21st St.
Brooklyn N.Y , 11229

(Complainant)

v.

POLINA DOLGINOV
Dolinsky 44/24
Rehovot, 76569, Israel

(Respondent)

Domain Names In Dispute:

abc-cross-stitch-patterns.com
abc-embroidery-designs.com

**COMPLAINT IN ACCORDANCE WITH
THE UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY**

[1.] This Complaint is hereby submitted for decision in accordance with the Uniform Domain Name Dispute Resolution Policy, adopted by the Internet Corporation for Assigned Names and Numbers (ICANN) on August 26, 1999 and approved by ICANN on October 24, 1999 (ICANN Policy), and the Rules for Uniform Domain Name Dispute Resolution Policy (ICANN Rules), adopted by ICANN on August 26, 1999 and approved by ICANN on October 24, 1999, and the National Arbitration Forum (NAF) Supplemental Rules (Supp. Rules). ICANN Rule 3(b)(i).

[2.] COMPLAINANT INFORMATION

[a.] Name: Anna Bove
[b.] Address: 2100 East 21st St
Brooklyn N.Y , 11229
[c.] Telephone: (718) 743-9005
[d.] E-Mail: anna.bove@fusemail.com

Authorized Representative

[a.] Name: Lévisohn Berger, LLP
[b.] Address: 61 Broadway, 32nd Floor
New York, New York 10006
[c.] Telephone: (212) 486-7272
[d.] Fax: (212) 486-0323

[e.] E-Mail: trotberg@llbl.com

The Complainant's preferred method for communications directed to the Complainant in the administrative proceeding:

Electronic-Only Material

[a.] Method: E-Mail
[b.] Address: trotberg@llbl.com
[c.] Contact: Tuvia Rotberg

Material Including Hard Copy

[a.] Method: Fax
[b.] Fax: (212) 486-0323
[c.] Contact: Tuvia Rotberg

Panel

The Complainant chooses to have this dispute heard before a single-member administrative panel ICANN Rule 3(b)(iv).

[3.] RESPONDENT INFORMATION

[a.] Name: Polina Dolginov
[b.] Address: Dolinsky 44/24
Rehovot, 76569, Israel
[c.] Tel: 972-8-935-1083
[d.] E-Mail: demonmx@hotmail.com

[4.] DISPUTED DOMAIN NAMES

[a.] The following domain names are the subject of this Complaint pursuant to ICANN Rule 3(b)(vi):

abc-cross-stitch-patterns.com
abc-embroidery-designs.com

[b.] Registrar Information: ICANN Rule 3(b)(vii).

[i.] Registrar's Name: GODADDY.COM, INC.
[ii.] Registrar Address: 14455 N. Hayden Rd., Suite 219
Scottsdale, AZ 85260
[iii.] Telephone Number: (480) 505-8877
[iv.] E-Mail Address: abuse@godaddy.com

[c.] Trademark Information: ICANN Rule 3(b)(viii).

ABC (ANNA BOVE COLLECTIONS)
ABC-CROSS-STITCH-PATTERNS
ABC-EMBROIDERY-DESIGNS

FOR: EMBROIDERY PATTERNS AND DESIGNS

[5.] FACTUAL AND LEGAL GROUNDS

This Complaint is based on the following factual and legal grounds pursuant to ICANN Rule 3(b)(ix):

The Domains that are the subject of this Complaint ("Domains" herein) were registered for websites created to sell Complainant's original work. The Domains were the property of Complainant and were misappropriated by Respondents.

Complainant, Anna Bove, is an artist who creates pattern designs for embroidery. In 2002, Complainant started a business selling these designs on the Internet. She hired Polina Dolginov to work for her. Complainant was in charge of creating the designs and Ms. Dolginov was responsible for creating and maintaining various websites to market and sell the same. All designs were sold under the "ABC" or "Anna Bove Collections" designation (See Exhibits G, H).

In June of 2002, Ms. Dolginov registered the Domains with DirectNIC. She was the contact person for the Domains and has maintained the websites from 2002 until June of 2007 including making payments for hosting services and renewal payments for the Domain registrations. See Exhibit A. She made payments to DirectNIC from her personal credit card and from that bearing her mother's name Nataly Dolginov (See Exhibit B) and set up Paypal accounts (See Exhibit C).

Complainant and Ms. Dolginov were living in Israel at the time they started the business. They hired Vadim Mikhlin and his wife, Inga Mikhlin, to run the business in the United States.

In June of 2007, for the sole purpose of transferring the websites to a new platform, the username/passwords for the Domains were given to Vadim Mikhlin and Inga Mikhlin.

In 2008, Complainant discovered that she no longer had access to the websites and that they were transferred to GODADDY.COM with Domains By Proxy listed as the Registrant. See Exhibit D. The username/password and all contact information were changed thus preventing Complainant from accessing her own websites. This was done without the knowledge or authority of Complainant or Ms. Dolginov. See Exhibit E.

Upon information and belief Vadim Mikhlin and/or Inga Mikhlin having gained access to the Domain's username/passwords have transferred the Domains to themselves or to a third party. Complainant, through an attorney, has sent a cease and desist letter to Vadim and Inga Mikhlyn (Exhibit F) and immediately thereafter, the website began selling Anna Bove's work at reduced rates. The websites are still active (See Exhibits G, H) and continue to sell Complainant's work. Respondent thus having misappropriated the websites, are profiting from unauthorized sale of Ms. Bove's artwork and in violation of her common law trademarks listed above.

Complainant has built significant good will in the ABC marks, having used them uninterrupted since 2002. Complainant has generated a great deal interest in her unique designs. She has amassed an e-mail list of over 300,000 customers of her works and she has continuously advertised her websites and products on various Internet listings. (See Exhibit I). The websites bear the ABC (Anna Bove Collection) designation in the Domain names and are displayed on the site. See Exhibits G, H.

[a.] Complainant owns common law trademark rights in the name ABC, ABC-CROSS-STITCH-PATTERNS and ABC-EMBROIDERY-DESIGNS.

Complainant is the owner of common law trademarks Anna Bove Collections (ABC), ABC-Cross-Stitch-Patterns and ABC-Embroidery-Designs. These marks have been used to sell patterns and designs for embroidery since 2002 and have become well known designations of source for Anna Bove's work.

Respondant's domain name is identical to Complainant's common law trademark. Note that a trademark registration is not necessary for a complainant to have trademark rights under the UDRP. *See Julia Fiona Roberts v. Russell Boyd*, D2000-0210 (WIPO May 29, 2000). *See also Great Plains Metromall, LLC v. Creach*, FA 97044 (Nat Arb. Forum May 18, 2001) ("The policy does not require that a trademark be registered by a government authority for such rights to exist.").

[b.] The Respondent has no rights or legitimate interests in respect of the domain name that are the subject of the complaint.

Complainant has not authorized or consented to Respondent's use of the marks, nor has Complainant made any statements or representations that may have been construed as such.

Respondents having illicitly transferred the Domains have no rights thereto. Moreover, Respondents interest in misappropriating Complainant's good will and copyrighted authored works for their own benefit is not a *legitimate* interest under ¶ 4 (c) (ii) of the Policy.

A "complainant's allegation that respondent has no rights or legitimate interests in the domain name at issue shifts the burden to the respondent to show by "concrete evidence" that respondent has rights or legitimate interests in respect of the domain name." *See*

Kevin Garnett v. Trap Block Technologies, FA 0210000128073 (Nat. Arb. Forum Nov. 21, 2002); *Kate Spade, LLC v Darmstadter Designs*, D2001-1384 (WIPO Jan 3, 2002) citing UDRP Policy ¶ 4(c). Concrete evidence requires documents and/or third party declarations in support of such assertions. Personal assertions are not enough. See *Kate Spade, LLC v Darmstadter Designs*, D2001-1384 (WIPO Jan 3, 2002) citing UDRP Policy ¶ 4(c). The failure of respondent to produce such evidence entitles the panel to conclude that the respondent has no such legitimate interests or rights.

[c.] The domain name was registered and is being used in bad faith.

Respondent's bad faith *registration* is clearly illustrated by its unauthorized transfer of the Domains, depriving Complainant access to her own websites and thereby effectively stealing her business. Their continued use of the Domains to sell Complainant's intellectual property in violation of Complainant's copyrights is evidence of bad faith *use*. Upon information and belief, Respondents had actual knowledge of Complainant's rights in the marks. See *Arab Bank for Inv. & Foreign Trade v Akkou*, D2000-1399 (WIPO Dec. 19, 2000) (finding bad faith registration, where the respondent was formerly employed by the complainant, was fully aware of the name of her employer).

Having illicitly received control of Complainant's Domains, Respondents have as such misleadingly diverted consumers away from Complainant. More than the average cybersquatter who trades for commercial gain on the reputation of another, Respondents are not only benefiting commercially from Complainant's reputation – they are diverting all of Complainant's revenue to themselves. Complainant having lost access to her websites cannot collect any profits she should rightfully receive from the sale of her goods. She also cannot post new works for sale.

Respondents needed Complainant's username/password to have transferred the Domains. They were as such actually aware of Complainant's trademarks. They have registered the Domains for the sole purpose of disrupting Complainant's business and intentionally attracted, for commercial gain, Internet users to the websites bearing the domain names that are the subject of this complaint demonstrating bad faith registration and use. See *Digi Int'l v DDI Sys.*, FA 124506 (Nat. Arb. Forum Oct. 24, 2002) (“[T]here is a legal presumption of bad faith, when Respondent reasonably should have been aware of Complainant's trademarks, actually or constructively.”)

[6.] REMEDY SOUGHT

The Complainant requests that the Panel issue a decision that the domain-name registrations be transferred to Complainant.

[7.] OTHER LEGAL PROCEEDINGS

Pursuant to ICANN Rule 3(b)(xi), there are no other legal proceedings that have been commenced or terminated in connection with or relating to any of the domain name(s) that are the subject of the complaint.

[8] COMPLAINT TRANSMISSION

The Complainant asserts that a copy of this Complaint, together with the cover sheet as prescribed by NAF's Supplemental Rules, has been sent or transmitted to the Respondent (domain-name holder), in accordance with ICANN Rule 2(b) and to the Registrar of the domain names, in accordance with NAF Supp. Rule 4(e). ICANN Rule 3(b)(xii); NAF Supp. Rule 4(c).

[9.] MUTUAL JURISDICTION

The Complainant will submit, with respect to any challenges to a decision in the administrative proceeding canceling or transferring the domain name, to where the Respondent is located, as shown by the address given for the domain name holder in the Whois Database at the time of the submission of the Complaint to NAF ICANN Rule 3(b)(xiii)

[10.] CERTIFICATION

Complainant agrees that its claims and remedies concerning the registration of the domain name, the dispute, or the dispute's resolution shall be solely against the domain-name holder and waives all such claims and remedies against (a) the National Arbitration Forum and panelists, except in the case of deliberate wrongdoing, (b) the registrar, (c) the registry administrator, and (d) the Internet Corporation for Assigned Names and Numbers, as well as their directors, officers, employees, and agents

Complainant certifies that the information contained in this Complaint is to the best of Complaint's knowledge complete and accurate, that this Complaint is not being presented for any improper purpose, such as to harass, and that the assertions in this Complaint are warranted under these Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully Submitted on behalf of the Complainant,



Tuvia Rotberg
LEVISOHN BERGER, LLP

Dated: 7/3/08

INDEX OF EXHIBITS

- EXHIBIT A** Whois information for the Domains showing Registrant Ms. Dolginov as contact for the Doamins.
- EXHIBIT B** Receipts for payments made by Ms. Dolginov for renewal of registration and hosting services.
- EXHIBIT C** Correspondence with Paypal signed by Complainant and Ms. Dolginov
- EXHIBIT D** Whois information for the Domains after the transfer to GODADDY.COM
- EXHIBIT E** Declaration of Ms. Dolginov.
- EXHIBIT F** Copy of cease and desist letter sent to Mr. and Mrs. Mikhlyn.
- EXHIBIT G** Print-out of "ABC Embroidery Designs" website (06/25/08). The "Anna Bove Collection" designation is prominently displayed above the PayPal page. The "about us" page references sister website "ABC cross stitch patterns."
- EXHIBIT H** Print-out of "ABC Cross Stitch Patterns" website (06/25/08). "Welcome to Anna Bove Collection, Inc." is prominently displayed. The page is signed by the ABC team, which include Anna Bove, Polina Dolginov and Inga Mikhlyn – a party believed to be involved in the illicit transfer of the Domains
- EXHIBIT I** Confirmations of payments for and screen captures of various Internet advertisements and listings.

EXHIBIT A



Abc-cross-stitch-patterns.com on 2007-04-20 - Domain History

[« Previous](#)

[Next »](#)

Domain: [abc-cross-stitch-patterns.com](#) - [Domain History](#)
Cache Date: 2007-04-20
Registrar: INTERCOSMOS MEDIA GROUP, INC. D/B/A DIRECTNIC.COM
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[info@abc-cross-stitch-patterns.com](#)

Registrant:

Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Domain Name: ABC-CROSS-STITCH-PATTERNS.COM

Administrative Contact:

Dolginov, Polina [info@abc-cross-stitch-patterns.com](#)
Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Technical Contact:

Dolginov, Polina [info@abc-cross-stitch-patterns.com](#)
Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Record last updated 01-12-2005 09:02:45 PM

Record expires on 06-01-2007

Record created on 06-01-2002

Domain servers in listed order:

NS1 ABAC.COM 216.55 128 4

NS2 ABAC.COM

216 55 144 4



Abc-embroidery-designs.com on 2007-06-27 - Domain History

[« Previous](#)

[Next »](#)

Domain: [abc-embroidery-designs.com](#) - [Domain History](#)
Cache Date: 2007-06-27
Registrar: INTERCOSMOS MEDIA GROUP, INC. D/B/A DIRECTNIC.COM
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[info@abc-cross-stitch-patterns.com](#)

Registrant:

Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Domain Name: ABC-EMBROIDERY-DESIGNS.COM

Administrative Contact:

Dolginov, Polina [info@abc-cross-stitch-patterns.com](#)
Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Technical Contact:

Dolginov, Polina [info@abc-cross-stitch-patterns.com](#)
Dolinsky 44/24
Rehovot, Shfela 76569
IL
972-3-9351083

Record last updated 06-12-2007 10:02:59 AM

Record expires on 07-26-2009

Record created on 07-25-2002

Domain servers in listed order:

NS1 ALL2FIND.COM 69.60 134 50

NS2 ALL2FIND COM	85.9.234.25
NS3 ALL2FIND.COM	62.205.217.10



Welcome paol

[Home](#) [Search](#) [Sign-Up](#) [My Account](#) [Help](#)
[Shopping Cart](#) [Logout](#)

April 05, 2003

Thank you! Your payment has been accepted.
Please print or save a copy of this page, as it is your proof of payment

Intercosmos Media Group, Inc ,
DBA DirectNIC
650 Poydras Street, Suite 1150
New Orleans, Louisiana 70130
+1 (504) 679-5170 telephone
+1 (504) 566-0484 fax
04/05/2003 03:35:44

Billed To:

Nataly Dolginov
Dolinsky 44/24
Rehovot, Shfela 76569
972-8-9351083

Customer No : 254765
Sales Draft#: 1427791
Pin Ref: VPVE93237406
Authorization Code: 304745
Nataly Dolginov,

Thank you for purchasing the following service(s) through DirectNIC:

<u>Type</u>	<u>Description</u>	<u>Quantity</u>	<u>Price</u>	<u>Subtotal</u>
directNIC_Renewal_COM	abc-cross-stitch-patterns com	1	\$15 00	\$15 00

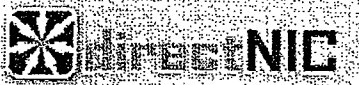
Total Amount Charged: US \$15.00

Remote IP Address: 80 179 188 111

**This is an official Intercosmos Media Group Inc receipt/sales draft for proof of payment

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Welcome pac

May 19, 2006

Thank you! Your payment has been accepted.
Please print or save a copy of this page, as it is your proof of payment.

Intercosmos Media Group, Inc.,
DBA DirectNIC
650 Poydras Street, Suite 1150
New Orleans, Louisiana 70130
+1 (504) 679-5170 telephone
+1 (504) 566-0484 fax
05/19/2006 00:56:25

Billed To:

Polina Dolginov
Dolinsky 44/24
Rehovot, Shfela 76569
972-3-9351083

Customer No : 254765
Sales Draft#: 3760927
Pin Ref: VDYE1D784726
Authorization Code: 856922

Polina Dolginov,

Thank you for purchasing the following service(s) through DirectNIC:

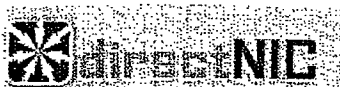
<u>Type</u>	<u>Description</u>	<u>Quantity</u>	<u>Price</u>	<u>Subtotal</u>
directNIC_Renewal_COM	abc-cross-stitch-patterns.com	1	\$15.00	\$15 00
directNIC_Renewal_COM	abc-embroidery-designs.com	1	\$15 00	\$15 00

Total Amount Charged: US \$30.00

Remote IP Address: 80 178.21 155

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Welcome paolarefy

May 04, 2007

Thank you! Your payment has been accepted.
Please print or save a copy of this page, as it is your proof of payment

Intercosmos Media Group, Inc.,
DBA DirectNIC
650 Poydras Street, Suite 1150
New Orleans, Louisiana 70130
+1 (504) 679-5170 telephone
+1 (504) 566-0484 fax
05/04/2007 00:31:48

Billed To:

Polina Dolginov
Dolinsky 44/24
Rehovot, Shfela 76569
972-3-9351083

Customer No.: 254765
Sales Draft#: 4205362
Pin Ref: VUHE0FE9CFB5
Authorization Code: 315168

Polina Dolginov,

Thank you for purchasing the following service(s) through DirectNIC:

<u>Type</u>	<u>Description</u>	<u>Quantity</u>	<u>Price</u>	<u>Subtotal</u>
directNIC_Renewal_COM	abc-cross-stitch-patterns.com	2	\$15 00	\$30.00
directNIC_Renewal_COM	abc-embroidery-designs.com	2	\$15 00	\$30.00

Total Amount Charged: US \$60 00

Remote IP Address: 88 154 21 194

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Recurring Credit Card Charge Authorization

- Please complete and sign this Credit Card Charge Authorization form
- Return the form via Fax to: (408) 998-3363 or via postal mail to the address shown above

All requested information is required. Upon approval, we will automatically bill your credit card at the beginning of each billing cycle for the amounts indicated and your total charges will appear on your monthly credit card statement. You may cancel this automatic billing authorization at any time by requesting in writing.

NOTE: The charges will appear on your Credit Card Statement as: **INFORTECH CORPORATION**

This is a: ☒ New Authorization ☐ Replacement of a previous authorization

Customer Number:

Order number: 200506131501-280

Customer / Company Name: Anna Bove Collections, Inc.

Credit Card Holder Name: Polina Dolginov

Mailing Address: Dolinsky 44/28 (as shown on Credit Card Statement)

Rehovot, 76569
Israel

Cardholder Telephone No.: 972-8-9351144 (include Country Code and City/Area Code)

Cardholder Email Address: polina80@012.net.il

Card Type (Check One):

☐ VISA ☒ Master Card ☐ American Express ☐ Discover

Credit Card No.: ~~XXXXXXXXXXXXXXXXXXXX~~

Expiration Date: 01-2006

Charge Schedule: 1. Initial Charges: \$ 338.00 (US Dollars)

2. Recurring Charges: \$ 338.00 (US Dollars)

(check one) ☒ Monthly ☐ Quarterly ☐ Half-Yearly ☐ Yearly

3. Incidental and additional charges as authorized by Service Agreement/s between Infotech Corporation and above named Customer.

I, an authorized signer of the credit card account stated above, hereby authorize Infotech Corporation to make charges to the credit card account shown above in the schedule as described above. I may, from time to time modify the Credit Card details using Infotech's Service Management System to reflect new expiration date, change in Credit Card Number, etc. This authorization will extend to any such modified Credit Card information I provide in the future. I hereby agree that this authorization will remain valid until revoked in writing. I agree not to submit a chargeback request on charges authorized by this form.

Signature: X *Polina Dolginov*

Date: June 16, 2005

Print Name: Polina Dolginov

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Your order has been processed, confirmation of your order and everything you need to get started will be sent to polina80@012.net.il, you may also wish to save or print this page for your records.

A summary of your order is shown below, please have this information to hand when contacting us regarding your order. This information will also be sent to you by email.

Order Summary

Date/Time Mon Mar 10 14:28:11 PST 2003

Username abcembro

Domain Name abc-cross-stitch-patterns.com

Plan Start-Up (Annually + 3 Months Free) (\$119.40)

Order Total \$119.40

Additional Services

If you would like to request additional services from Global Internet Solutions, please click the links provided below for the order forms

PromoPack 490+ <https://order.gisol.com/marketing/promo/>Banner Ads <https://order.gisol.com/marketing/banners/>Web Design <http://www.gisol.com/design/>Dial-Up Internet <http://www.gisol.com/dialup/>

Call Us NOW	Call TOLL FREE 1-888-616-0409 Local Number 1-323-455-1151	Domain Name Search	<input type="text" value="YourDomain"/> <input type="text" value="com"/>
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All content, images and text within are ©1998-2003 GISOL Inc. Global Internet Solutions. Trademarks are property of their legal owners.

| Username: abcembro

| Please place your credit card in this | ~~space~~ ~~front~~ ~~side~~ ~~up~~ ~~and~~ ~~make~~ ~~a~~ ~~photocopy~~ ~~or~~ ~~scan~~ ~~it~~ ~~as~~ ~~an~~ ~~image~~ | Email: info@abc-cross-stitch-patterns.ca

| Signature: [Signature]

| Fax the copy to: 323-653-6232 or

| toll-free at 888-616-3107, or email | Date: 03/13/2003

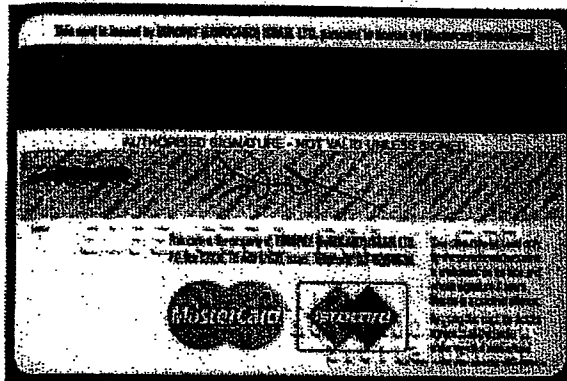
| your image to verify@gisol.com |

| Comments:

| If you are unable to fax or email us |

| this information, please contact us |

| by email at verify@gisol.com |





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May 16 2004

Purchase**Ordering**

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- ▶ [Ordering](#)
- ▶ [Pricing](#)
- ▶ [Contact Sales](#)

[Order Now](#)[Join Our Mailing List](#)

E-Mail Address:

[Other Options](#)**INVOICE**

05-16-2004 @ 17:50:31

View a [printer-friendly invoice](#) which you can print for your records. You will also receive an invoice via e-mail.

TO: Miss Polina Dolginov
Dolinsky 44/24
Rehovot, Shfela Israel
76569

Web Hosting Package	Setup Fee	Package Fee
Professional Web Hosting (one month) One month of Professional Web Hosting.	\$25	\$19.95
Total Fees	\$25.00	\$19.95
TOTAL PAYMENT	\$44.95	

Order Number: 1084744231-151421**Card:** master_card**Card Number:** xxxx xxxx xxxx**Expiration:** 09-2004**Name on Card:** Polina Dolginov

Your account will be created after your payment information has been verified, usually within a few hours. You will receive an e-mail when your account is ready.

HagenHosting.com
<http://www.hagenhosting.com/>
 730 24th St., N.W., Suite 14
 Washington, DC 20037
 USA

EXHIBIT C



My Account | Send Money | Request Money | Merchant Services | Auction Tools

Overview | Add Funds | Withdraw | History | Resolution Center | Profile

My Account Overview

Set up your account

• Add Credit Card

What's New

- Learn about important updates to Recent Activity
- Protect Yourself from Fraudulent Emails
- Security Tips
- Policy Updates

- July 9, 2008

Your account access is limited. [Learn how to remove this limitation.](#)

Welcome, **Polina Dolginov** ([support@abc-cross-stitch-patterns.com](#)) [Edit profile](#)

Business Name: **Polina Dolginov ABC-cross-stitch-patterns.com**

Account holder since 2001

Account type: **Business**

Status: **Verified (831)**

PayPal Balance		View limits
Currency	Balance	
U.S. Dollar	\$193.55 USD	

Account history: [All account activity](#) | [Payments sent](#) | [Payments received](#)

Recent activity: Last updated 5/4/2008 16:24 PDT

-No New Items-

[Mass Pay](#) | [Referrals](#) | [About Us](#) | [Accounts](#) | [Fees](#) | [Privacy](#) | [Security Center](#) | [Contact Us](#) | [User Agreement](#) | [Developers](#)



About SSL Certificates

Copyright © 1999-2008 PayPal. All rights reserved.
Consumer Advisory: PayPal Pte. Ltd. the holder of PayPal's stored value facility, does not require the approval of the Monetary Authority of Singapore. Users are advised to read the [terms and conditions](#) carefully.

[Log Out](#) | [Help](#) | [Security Center](#)[My Account](#) [Send Money](#) [Request Money](#) [Merchant Services](#) [Auction Tools](#)

Transaction Details

Your account access is limited [Learn how to remove this limitation](#)

Payment Sent (Unique Transaction ID #53E849604J527344U)

Transfer to: Walter Johnson

Email: walt@waltjohnson.us

Payment Sent to: walt_j@hotmail.com

Total Amount: -\$300.00 USD

Date: Oct 21, 2003

Time: 14:14:10 PDT

Status: Completed

Subject: Walter Johnson

Note: Hello Walt!

Here's the fee for our new site's advertisement

Please let us know if you received the money

We will email you the banner & link in a couple of minutes. Please just let us know when you will be able to feature it in your newsletter - we will send a text. Looking forward to your reply.

Kindest Regards,

Polina & Anna

<http://www.abc-embroidery-designs.com>

<http://www.abc-cross-stitch-patterns.com>

info@abc-cross-stitch-patterns.com

Shipping Address: No Address Provided

Funding Type: PayPal Funds

Funding Source: \$300.00 USD - PayPal Account

[Return to Log](#)

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About SSL Certificates

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facility does not require the approval of the Monetary Authority of Singapore
Users are advised to read the terms and conditions carefully.

EXHIBIT D



Abc-cross-stitch-patterns.com on 2007-12-06 - Domain History

[« Previous](#)

[Next »](#)

Domain: [abc-cross-stitch-patterns.com](#) - [Domain History](#)
Cache Date: 2007-12-06
Registrar: GODADDY.COM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[abc-cross-stitch-patterns.com@domainsbyproxy.com](#)

Registrant:

Domains by Proxy, Inc
DomainsByProxy.com
15111 N Hayden Rd., Ste 160. PMB 353
Scottsdale, Arizona 85260
United States

Domain Name: ABC-CROSS-STITCH-PATTERNS.COM

Created on: 01-Jun-02
Expires on: 01-Jun-11
Last Updated on: 24-Jul-07

Administrative Contact:

Private. Registration ABC-CROSS-STITCH-PATTERNS.COM@domainsbyproxy.com
Domains by Proxy, Inc
DomainsByProxy.com
15111 N Hayden Rd., Ste 160. PMB 353
Scottsdale, Arizona 85260
United States
(480) 624-2599 Fax -- (480) 624-2599

Technical Contact:

Private. Registration ABC-CROSS-STITCH-PATTERNS.COM@domainsbyproxy.com
Domains by Proxy, Inc.
DomainsByProxy.com
15111 N Hayden Rd Ste 160 PMB 353
Scottsdale, Arizona 85260
United States
(480) 624-2599 Fax -- (480) 624-2599

Domain servers in listed order:

NS1.ALL2FIND.COM

NS3.ALL2FIND.COM

NSB.ALL2FIND.COM



Abc-embroidery-designs.com on 2007-07-17 - Domain History

[« Previous](#)

[Next »](#)

Domain: [abc-embroidery-designs.com](#) - [Domain History](#)
Cache Date: 2007-07-17
Registrar: GODADDY.COM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[abc-embroidery-designs.com@domainsbyproxy.com](#)

Registrant:

Domains by Proxy, Inc.
DomainsByProxy.com
15111 N Hayden Rd., Ste 160, PMB 353
Scottsdale, Arizona 85260
United States

Domain Name: ABC-EMBROIDERY-DESIGNS.COM

Created on: 25-Jul-02
Expires on: 25-Jul-11
Last Updated on: 09-Jul-07

Administrative Contact:

Private, Registration ABC-EMBROIDERY-DESIGNS.COM@domainsbyproxy.com
Domains by Proxy, Inc
DomainsByProxy.com
15111 N. Hayden Rd. Ste 160, PMB 353
Scottsdale Arizona 85260
United States
(480) 624-2599 Fax -- (480) 624-2599

Technical Contact:

Private Registration ABC-EMBROIDERY-DESIGNS.COM@domainsbyproxy.com
Domains by Proxy, Inc
DomainsByProxy.com
15111 N Hayden Rd , Ste 160, PMB 353
Scottsdale, Arizona 85260
United States
(480) 624-2599 Fax -- (480) 624-2599

Domain servers in listed order:

NS1 ALL2FIND COM

NS3 ALL2FIND COM

NSB ALL2FIND COM

EXHIBIT E

Policy | Terms & Conditions | Links
ABC Counted Cross-Stitch Patterns online!
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[Home](#) [Help](#) [About Us](#) [Guestbook](#) [Contact Us](#)

COUNTED CROSS STITCH PATTERNS - PRINTABLE PDF FORMAT CHARTS

[Top 100 Cross Stitch Sites](#)

- ✂ Free Patterns
- ✂ ABC Samplers
- ✂ Alphabets & Monograms
- ✂ Ancient Egypt
- ✂ Angels
- ✂ Birds
- ✂ Christmas
- ✂ Dogs
- ✂ Easter
- ✂ Flowers
- ✂ Fruits & Berries
- ✂ Greetings
- ✂ Halloween
- ✂ Holidays
- ✂ Magic
- ✂ Marine Motifs
- ✂ Babies & Kids
- ✂ Native American
- ✂ Patriotic
- ✂ Romance & Valentine
- ✂ Teddy Bears
- ✂ Wedding
- ✂ Projects

Welcome to Anna Bove Collections, Inc.

ABC-cross-stitch-patterns.com & **ABC-embroidery-patterns.com** are maintained by Anna Bove Collections, Inc.

We offer a huge selections of embroidery patterns, and various machine embroidery supplies.

Hope you would love the products we carry. All of them are of great quality. We test stitch and adjust each embroidery pattern until it sews out like it should. Each tangible product - like embroidery thread and stabilizers - is extensively tested as well, before being offered for sale.

If you have any questions not covered in our **help** & **tips** sections - please **contact us**. We will be happy to answer your questions. At least we'll try.

P.S.

We offer free technical support by email in case you encounter any problem with items you've purchased from us, or if you just have a question.

We wish you a wonderful day & happy stitching!

Kindest Regards,
A.B.C. Team (Anna Bove, Polina Dolginov & Inga Mikhlyn)

Anna Bove Collections, Inc.

Our Address:

Anna Bove Collections, Inc.
Brooklyn, NY, United States



Keep up with
special offers, news,
free designs, tips etc

Name:

Email:

Password:

Confirm Password:

[update subscription](#)

Toll Free (for ordering only!): 877-870-5286

If you call before or after 12PM - 3PM Eastern Time, please just leave a message with your name, phone # and best time to reach you. We'll call you back and write down your order.

For customer support, please E-mail us at: info@abc-embroidery-patterns.com

Fax: 718-701-4998

[Counted Cross-Stitch Patterns Home](#) | [Free Cross-Stitch Patterns](#) | [Cross-Stitch Projects](#) | [Christmas Cross-Stitch Patterns](#) | [Contact Us](#) | [Privacy Policy](#) | [Terms & Conditions](#) | [Links](#)

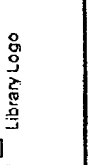
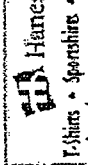
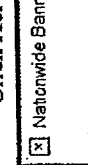




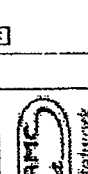

ABC Counted Cross-Stitch Patterns online!

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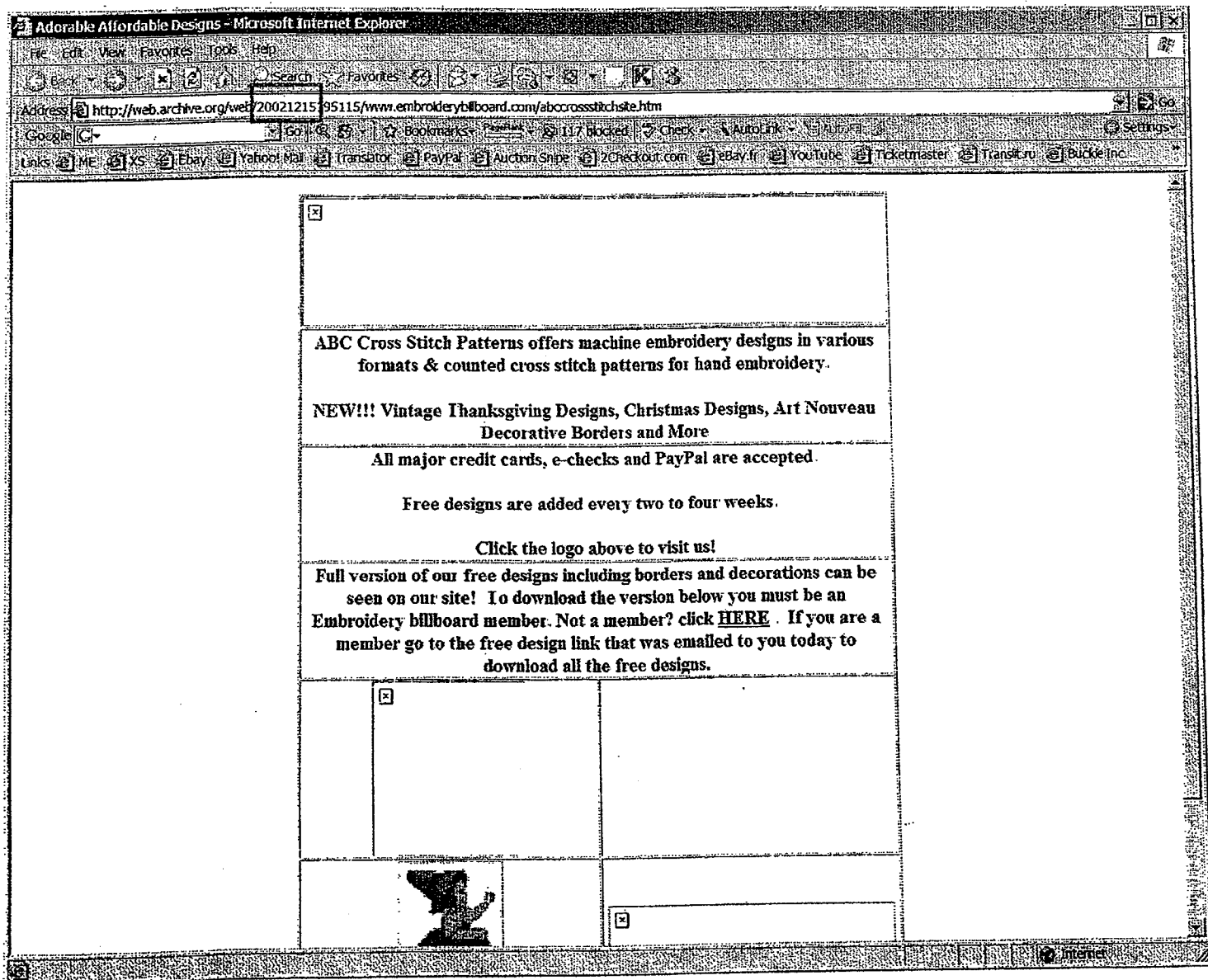
Serving the commercial embroidery industry.

**Buying or selling used equipment?
You've come to the right place!**

We apologize for the long name...Bookmark us now!

 <p>Small Embroidery Library Logo</p>	<p>Click Here</p>	 <p>Hanes T-Shirts • Socks • Undershirts</p>	<p>Click Here</p>	 <p>Nationwide Banner</p>	<p>Click Here</p>
 <p>EQUIPMENT LEASING</p>	<p>Click Here</p>	 <p>STAR BIRD</p>	<p>Click Here</p>	 <p>CROSS-STITCH MACHINE EMBROIDERY DESIGNS</p>	<p>Click Here</p>
 <p>THE EMBROIDERY SOURCE</p>	<p>Click Here</p>	 <p>MONOGRAMICS A Nationwide Network of Embroidery Stores</p>	<p>Click Here</p>	 <p>STAR BIRD</p>	<p>Click Here</p>

ABC-cross-stitch-patterns listing on Embroidery Billboard 2002



Anna Bove Company, LLC

From: "EmbroideryBillboard" <embroiderybillboard@cox.net>
To: "Anna Bove Company, LLC" <ana_bove@fusemail.com>
Sent: Sunday, June 15, 2008 5:04 PM
Subject: RE: Letter from Pam

To Whom It May Concern---

Anna Bove and Polina Dolginov have been advertising through my service, Embroidery Billboard, since the beginning of October of 2002. The first payment from them was received on September 27, 2002 and they have continually advertised through me from that date to the present. They run two web sites, ABC Cross Stitch and ABC Embroidery (<http://abc-cross-stitch-patterns.com> and <http://abc-embroidery-designs.com>). It has been a pleasure working with them to increase their sales.

Pamela Hanson
Embroidery Billboard and Adorable Affordable Designs Owner and Creator
Doing Business As Adorable Affordable Designs, LLC
8111 Molokai Drive
Papillion, NE 68046 USA
402-597-1978
embroiderybillboard@cox.net

6/15/2008

Advertising Authorization
Primedia Business Magazine and Media
Leigh Hughes
Phone:866-380-9847
Fax:770-914-0672

Advertiser: ABC-Cross Stitch Patterns.com
Contact: Polina Doliginov and Anna Bove
Dolinsky 44/24
Rehovot, Israel 76569
Email: abc-cross-stitch-patterns.com

Magazine: Stitches
Ad Size: word ad- 20 words
Color:
Issues: April 03-Dec.03

Frequency Level: single ad
Color Cost:
Total Cost per Insertion: \$46.00
Materials: per email

Special Instructions: ad also for Profitable Embroiderer-\$23.00
Credit Card: Mastercard; CC#: 5326 1003 0553 3303 ;
Card Holder Name: Nataly Dolginov ; Exp. date: 11/2003

Customer Authorization  **per fax**  **Date** 3/11/03

Terms of Sale: Net Thirty from the date of invoice. Sequential Liability: Advertiser and Advertising Agency are jointly and severally liable for payment. Primedia will not release any advertising agency from liability even if sequential liability clauses are included in contracts, insertion order, purchase order, etc. Correspondence containing sequential liability clauses will not be accepted. Short Rate Protection: Advertisers billed at special contract rates based on frequency, who fail to fulfill the contract, will be billed for the difference to reflect the actual rate that was earned. All terms and conditions associated with this advertising order are detailed on the official publication rate card.

Please sign and return via fax to: Leigh Hughes, 770-914-0672, then *51
Thank You!

PRIMEDIA

Business Magazines & Media

Invoice

Invoice Date 06/18/03

Issue Date PROFITABLE EMBR 6/03

Publishers of: STITCHES MAGAZINE

Sold To:

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT

ISRAEL 76569

Advertiser:

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT

ISRAEL 76569

Account Number 075921101

Invoice #	Description	Amount	Net Price
151023001 ST	STITCHES SUPPLEMENTS 20 WORD PURCHASE ORDER #: P. DOLIGINOV	23.00	23.00

Payment Terms Net 30 Days From Date of Invoice Total Due (U.S. Dollars) 23.00

REMIT TO:

PRIMEDIA BUSINESS MAGAZINES & MEDIA
P.O. BOX 96985
CHICAGO, IL 60693

(Please do not confuse with other PRIMEDIA companies)

Thank you for your business!

(800) 814-9511 X-1696

If you have questions about your account or wish to pay by credit card please call your credit rep at

Please return this portion with your payment

PRIMEDIA

Business Magazines & Media

Customer

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT

ISRAEL 76569

Publication

STITCHES MAGAZINE

Issue Date

PROFITABLE EMBR 6/03

Account Number 075921101

Invoice Amount

23.00

Amount Paid

PRIMEDIA

Business Magazines & Media

Invoice

Invoice Date 04/17/03

Issue Date PROFITABLE EMBR 4/03

Publishers of: **STITCHES MAGAZINE**

Sold To:

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT ISRAEL 76569

Advertiser:

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT ISRAEL 76569

Account Number 075921101

Invoice #	Description	Amount	Net Price
135971001 ST	STITCHES SUPPLEMENTS 20 WORD PURCHASE ORDER #: P. DOLIGINOV	23.00	23.00

Payment Terms Net 30 Days From Date of Invoice Total Due (U.S. Dollars) 23.00

REMIT TO:
PRIMEDIA BUSINESS MAGAZINES & MEDIA (Please do not confuse with other PRIMEDIA companies)
P.O. BOX 96985
CHICAGO, IL 60693

Thank you for your business!

If you have questions about your account or wish to pay by credit card please call your credit rep at: (800) 814-9511 X-1696

Please return this portion with your payment

PRIMEDIA

Business Magazines & Media

Customer

ABC-CROSS STITCH PATTERNS
POLINA DOLIGINOV
DOLINSKY 44/24
REHOVOT ISRAEL 76569

Account Number 075921101

Invoice Number 135971001

Invoice Amount 23.00

Amount Paid

STATEMENT

PRIMEDIA

Special Interest Publications

6405 Flank Drive, Harrisburg, PA 17112 • Phone: 717-657-9555

PLEASE
ATTACH
COPY OF
INVOICE
WITH
REMITTANCE
TO INSURE
PROPER
CREDIT
TO YOUR
ACCOUNT

DATE
ACCOUNT NO.
ABCCS

BILL TO:

NATALY DOLGINOV
ABC CROSS-STITCH-PATTERNS.COM
BOLINSKY 44/24
REHOVOT, 76569
ISRAEL

STATEMENT AS OF 08/04/03

DATE	CODE	REFERENCE	AMOUNT	ISSUE	INVOICE BALANCE
06/05/03	INVC	*CREATIVE MACHINE EMBROIDERY 15100302	450.50	J/A03	450.50
Your account is beyond our standard payment terms. Please remit payment.					TOTAL DUE
					450.50
CURRENT	31 - 60 DAYS	61 - 90 DAYS	91 - 120 DAYS	120 AND OVER	
0.00	0.00	450.50	0.00	0.00	

Payments to Bazar, Inc - Directory Listing

Date	Time	Name	Subject	Amount	Note	From Email	To Email	Transaction ID	Proof
11/21/2003	19:18:09	Bazar, Inc.	Directory Listing	-15	Dear Webmaster, hello! Please include our site in your crafts directory, in category related to needlework, cross stitch & machine embroidery. Here are our site details: ABC-cross-stitch-patterns.com - Machine embroidery designs in cross-stitch technique and various supplies for machine embroidery. The designs are available in most embroidery machines formats! Free designs ARCHIVE, new freebee designs and projects added on regular basis. Thank you very much. Kindest Regards, Polina & Anna	support@abc-cross-stitch-patterns.com	admin@bazar.biz	6PG39269M331713V	PayPal transaction



[My Account - >](#)

Welcome, dolginovp

Yahoo! Directory Listings

[Yahoo! Express Home](#) > [Request New Listing](#)

Request a New Listing: Confirmation

Thank you for using the Yahoo! Express service.

The following is a summary of your order:

Order ID: Order 20619858

Status: Pending

Price: US\$299

URL: <http://www.abc-cross-stitch-patterns.com>

We recommend that you print out a copy of this order and keep a record of your order ID. This is the only way we can track your request. This order number is also included in the order confirmation sent to the email address you entered.

Your credit card has been billed **US\$299**. We will respond to all orders within seven (7) business days from the date we submit your order (excluding holiday periods observed by Yahoo!).

For more information about the Yahoo! Express service, check the [Yahoo! Express Frequently Asked Questions](#).

If your site is in multiple languages, please visit our international Express pages :
[France](#) [Germany](#) [Italy](#) [Denmark](#) [Sweden](#) [Norway](#)

Thanks again!

[Get included in Inktomi search results.](#)

Additional Opportunities to Market Your Web Site on Yahoo!

If your site is listed in the Yahoo! Directory take advantage of an exceptional opportunity to enhance your site's visibility in eligible commercial categories, be among the first few sites shown on the page and highlighted in the alphabetical listing by becoming a Yahoo! Sponsor Listing. [Click to Learn More](#)

Sell online with the most trusted name on the Internet: [Yahoo! Store](#)

Tired of the same old mousetrap? Build a better web site with [Yahoo! Web Hosting](#)

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[My Account - >](#)

Welcome, dolginovp

Yahoo! Directory Listings

[Yahoo! Express Home](#) > [Request New Listing](#)

Request a New Listing: Confirmation

Thank you for using the Yahoo! Express service.

The following is a summary of your order:

Order ID: Order 20620232

Status: Pending

Price: US\$299

URL: <http://www.abc-embroidery-designs.com>

We recommend that you print out a copy of this order and keep a record of your order ID. This is the only way we can track your request. This order number is also included in the order confirmation sent to the email address you entered.

Your credit card has been billed **US\$299**. We will respond to all orders within seven (7) business days from the date you submit your order (excluding holiday periods observed by Yahoo!).

For more information about the Yahoo! Express service, check the [Yahoo! Express Frequently Asked Questions](#)

If your site is in multiple languages, please visit our international Express pages :
[France](#) [Germany](#) [Italy](#) [Denmark](#) [Sweden](#) [Norway](#)

Thanks again!

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Additional Opportunities to Market Your Web Site on Yahoo!

If your site is listed in the Yahoo! Directory take advantage of an exceptional opportunity to enhance your site's visibility in eligible commercial categories, be among the first few sites shown on the page and highlighted in the alphabetical listing by becoming a Yahoo! Sponsor Listing [Click to Learn More](#)

Sell online with the most trusted name on the Internet: [Yahoo! Store](#)

Tired of the same old mousetrap? Build a better web site with [Yahoo! Web Hosting](#)

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Uniform Domain Name Dispute Resolution Policy

Policy Adopted: August 26, 1999
Implementation Documents Approved: October 24, 1999

Notes:

1. This policy is now in effect. See www.icann.org/udrp/udrp-schedule.htm for the implementation schedule.
2. This policy has been adopted by all accredited domain-name registrars for domain names ending in .com, .net, and .org. It has also been adopted by certain managers of country-code top-level domains (e.g., .nu, .tv, .ws).
3. The policy is between the registrar (or other registration authority in the case of a country-code top-level domain) and its customer (the domain-name holder or registrant). Thus, the policy uses "we" and "our" to refer to the registrar and it uses "you" and "your" to refer to the domain-name holder.

Uniform Domain Name Dispute Resolution Policy

(As Approved by ICANN on October 24, 1999)

1. Purpose. This Uniform Domain Name Dispute Resolution Policy (the "Policy") has been adopted by the Internet Corporation for Assigned Names and Numbers ("ICANN"), is incorporated by reference into your Registration Agreement, and sets forth the terms and conditions in connection with a dispute between you and any party other than us (the registrar) over the registration and use of an Internet domain name registered by you. Proceedings under Paragraph 4 of this Policy will be conducted according to the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules of Procedure"), which are available at www.icann.org/udrp/udrp-rules-24oct99.htm, and the selected administrative-dispute-resolution service provider's supplemental rules.

2. Your Representations. By applying to register a domain name, or by asking us to maintain or renew a domain name registration, you hereby represent and warrant to us that (a) the statements that you made in your Registration Agreement are complete and accurate; (b) to your knowledge, the registration of the domain name will not infringe upon or otherwise violate the rights of any third party; (c) you are not registering the domain name for an unlawful purpose; and (d) you will not knowingly use the domain name in violation of any applicable laws or regulations. It is your responsibility to determine whether your domain name registration infringes or violates someone else's

rights.

3. Cancellations, Transfers, and Changes. We will cancel, transfer or otherwise make changes to domain name registrations under the following circumstances:

- a. subject to the provisions of Paragraph 8, our receipt of written or appropriate electronic instructions from you or your authorized agent to take such action;
- b. our receipt of an order from a court or arbitral tribunal, in each case of competent jurisdiction, requiring such action; and/or
- c. our receipt of a decision of an Administrative Panel requiring such action in any administrative proceeding to which you were a party and which was conducted under this Policy or a later version of this Policy adopted by ICANN. (See Paragraph 4(i) and (k) below.)

We may also cancel, transfer or otherwise make changes to a domain name registration in accordance with the terms of your Registration Agreement or other legal requirements.

4. Mandatory Administrative Proceeding.

This Paragraph sets forth the type of disputes for which you are required to submit to a mandatory administrative proceeding. These proceedings will be conducted before one of the administrative-dispute-resolution service providers listed at www.icann.org/udrp/approved-providers.htm (each, a "Provider").

a. Applicable Disputes. You are required to submit to a mandatory administrative proceeding in the event that a third party (a "complainant") asserts to the applicable Provider, in compliance with the Rules of Procedure, that

(i) your domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and

(ii) you have no rights or legitimate interests in respect of the domain name; and

(iii) your domain name has been registered and is being used in bad faith.

In the administrative proceeding, the complainant must prove that each of these three elements are present.

b. Evidence of Registration and Use in Bad Faith. For the purposes of Paragraph 4(a)(iii), the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith:

(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

(ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location.

c. How to Demonstrate Your Rights to and Legitimate Interests in the Domain Name in Responding to a Complaint. When you receive a complaint, you should refer to Paragraph 5 of the Rules of Procedure in determining how your response should be prepared. Any of the following circumstances, in particular but without limitation, if found by the Panel to be proved based on its evaluation of all evidence presented, shall demonstrate your rights or legitimate interests to the domain name for purposes of Paragraph 4(a)(ii):

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

d. Selection of Provider. The complainant shall select the Provider from among those approved by ICANN by submitting the complaint to that Provider. The selected Provider will administer the proceeding, except in cases of consolidation as described in Paragraph 4(f).

e. Initiation of Proceeding and Process and Appointment of Administrative Panel. The Rules of Procedure state the process for initiating and conducting a proceeding and for appointing the panel that will decide the dispute (the "Administrative Panel").

f. Consolidation. In the event of multiple disputes between you and a complainant, either you or the complainant may petition to consolidate the disputes before a single Administrative Panel. This petition shall be made to the first Administrative Panel appointed to hear a pending dispute between the parties. This Administrative Panel may consolidate before it any or all such disputes in its sole discretion, provided that the disputes being consolidated are governed by this Policy or a later version of this Policy adopted by ICANN.

g. Fees. All fees charged by a Provider in connection with any dispute before an Administrative Panel pursuant to this Policy shall be paid by the complainant, except in cases where you elect to expand the Administrative Panel from one to three panelists as provided in Paragraph 5(b)(iv) of the Rules of Procedure, in which case all fees will be split evenly by you and the complainant.

h. Our Involvement in Administrative Proceedings. We do not, and will not, participate in the administration or conduct of any proceeding before an Administrative Panel. In addition, we will not be liable as a result of any decisions rendered by the Administrative Panel.

i. Remedies. The remedies available to a complainant pursuant to any proceeding before an Administrative Panel shall be limited to requiring the cancellation of your domain name or the transfer of your domain name registration to the complainant.

j. Notification and Publication. The Provider shall notify us of any decision made by an Administrative Panel with respect to a domain name you have registered with us. All decisions under this Policy will be published in full over the Internet, except when an Administrative Panel determines in an exceptional case to redact portions of its decision.

k. Availability of Court Proceedings. The mandatory administrative proceeding requirements set forth in Paragraph 4 shall not prevent either you or the complainant from submitting the dispute to a court of competent jurisdiction for independent resolution before such mandatory administrative proceeding is commenced or after such proceeding is concluded. If an Administrative Panel decides that your domain name registration should be canceled or transferred, we will wait ten (10) business days (as observed in the location of our principal office) after we are informed by the applicable Provider of the Administrative Panel's decision before implementing that decision. We will then implement the decision unless we have received from you during that ten (10) business day period official documentation (such as a copy of a complaint, file-stamped by the clerk of the court) that you have commenced a lawsuit against the complainant in a jurisdiction to which the complainant has submitted under Paragraph 3(b)(xiii) of the Rules of

Procedure. (In general, that jurisdiction is either the location of our principal office or of your address as shown in our Whois database. See Paragraphs 1 and 3(b)(xiii) of the Rules of Procedure for details.) If we receive such documentation within the ten (10) business day period, we will not implement the Administrative Panel's decision, and we will take no further action, until we receive (i) evidence satisfactory to us of a resolution between the parties; (ii) evidence satisfactory to us that your lawsuit has been dismissed or withdrawn; or (iii) a copy of an order from such court dismissing your lawsuit or ordering that you do not have the right to continue to use your domain name.

5. All Other Disputes and Litigation. All other disputes between you and any party other than us regarding your domain name registration that are not brought pursuant to the mandatory administrative proceeding provisions of Paragraph 4 shall be resolved between you and such other party through any court, arbitration or other proceeding that may be available.

6. Our Involvement in Disputes. We will not participate in any way in any dispute between you and any party other than us regarding the registration and use of your domain name. You shall not name us as a party or otherwise include us in any such proceeding. In the event that we are named as a party in any such proceeding, we reserve the right to raise any and all defenses deemed appropriate, and to take any other action necessary to defend ourselves.

7. Maintaining the Status Quo. We will not cancel, transfer, activate, deactivate, or otherwise change the status of any domain name registration under this Policy except as provided in Paragraph 3 above.

8. Transfers During a Dispute.

a. Transfers of a Domain Name to a New Holder. You may not transfer your domain name registration to another holder (i) during a pending administrative proceeding brought pursuant to Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded; or (ii) during a pending court proceeding or arbitration commenced regarding your domain name unless the party to whom the domain name registration is being transferred agrees, in writing, to be bound by the decision of the court or arbitrator. We reserve the right to cancel any transfer of a domain name registration to another holder that is made in violation of this subparagraph.

b. Changing Registrars. You may not transfer your domain name registration to another registrar during a pending administrative proceeding brought pursuant to Paragraph 4 or for a period of fifteen (15) business days (as observed in the location of our principal place of business) after such proceeding is concluded. You may transfer administration of your domain name registration to another registrar during a pending court action or arbitration, provided that the domain name you have registered with us shall continue to be subject to the proceedings commenced against you in accordance with the terms of this Policy. In the event that you transfer a domain name registration to us during the pendency of a court action or

arbitration, such dispute shall remain subject to the domain name dispute policy of the registrar from which the domain name registration was transferred.

9. Policy Modifications. We reserve the right to modify this Policy at any time with the permission of ICANN. We will post our revised Policy at <URL> at least thirty (30) calendar days before it becomes effective. Unless this Policy has already been invoked by the submission of a complaint to a Provider, in which event the version of the Policy in effect at the time it was invoked will apply to you until the dispute is over, all such changes will be binding upon you with respect to any domain name registration dispute, whether the dispute arose before, on or after the effective date of our change. In the event that you object to a change in this Policy, your sole remedy is to cancel your domain name registration with us, provided that you will not be entitled to a refund of any fees you paid to us. The revised Policy will apply to you until you cancel your domain name registration.

Comments concerning the layout, construction and functionality of this site
should be sent to webmaster@icann.org

Page Updated 17-May-2002

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IN THE NATIONAL ARBITRATION FORUM

Re: Ana Bove v. Domains By Proxy
For: abc-cross-stitch-patterns.com
abc-embroidery-designs.com
Attorney Docket No. 1851.000

DECLARATION OF REGISTRANT

I, Polina Dolginov, do declare and state:

1. I have been working with Ana Bove since 2002.
2. Some of my responsibilities include the creation and maintenance of various websites for the benefit of Ana Bove.
3. I am the original registrant for the domains ("Domains"):
abc-cross-stitch-patterns.com
abc-embroidery-designs.com
4. In the course of my work with Ana Bove, I registered the Domains in the DirectNIC registrar for the purpose of creating websites to sell her work.
5. I continued to maintain the registrations of the Domains for Ana Bove until 2007. I have made renewal payments for the Domains using my personal credit card, or that bearing my mother's name, Nataly Dolginov.
6. The Domains were transferred in 2007 without my knowledge and are now registered through GODADDY.COM to Domains By Proxy. I did not give permission or authority to anyone including Vadim Mikhlyn and Inga Mikhlyn to transfer the Domains nor to make any other changes to the registration.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under §1001 of Title 18 of the United States Code.


Polina Dolginov

Polina Dolginov

LEGITIMATE
COPYRIGHT
OWNERS
AND
REGISTERED
TRADEMARK
HOLDERS

Date: 24/06/2008

EXHIBIT F

LAW OFFICES OF ALEXEY BAKMAN, ESQ.

ATTORNEYS AT LAW

225 BROADWAY, 38TH FLOOR, NEW YORK, NY 10007
TELEPHONE: (212)380-1186
FACSIMILE: (212)645-6027

May 12, 2008

6801 19th Ave. #4P
Brooklyn, NY 11204

Via Express Mail and

E-mail: abc.all@fusemail.com, abcembro@fusemail.com

Re.: Ana Bove v. Inga Mikhlyn, Vadim Mikhlyn
Our File No. 08/1105

Dear Mr. and Mrs. Mikhlyn:

Please be advised that we represent Ana Bove, the creator and owner of web domains: ABC-CROSS-STITCH-PATTERNS.COM, ABC-EMBROIDERY-DESIGNS.COM, ABC-FREE-CROSS-STITCH-PATTERNS.COM, ABC-FREE-MACHINE-EMBROIDERY-DESIGNS.COM, ANNABOVECOLLECTIONS.COM (the "Domains") and eBay store ABC-Embroidery-Designs, located at <http://stores.ebay.com/ABC-embroidery-designs>. Being the original creator, our client is also the owner of the proprietary copyright and trademark rights in the entire content of these domains, including, but not limited to, the domain names, website designs and code, embroidery designs, stitch patterns and marks, including the "ThreaDelight" mark.

Ana Bove is also the owner of the company, ABC ALL CONSULTING, INC., (aka ANNA BOVE COLLECTIONS, Inc.) (the "Company") and the sole proprietor to the valuable client database, associated with the domains and the company.

As you are well aware, the business was born out of Ana's life-long fascination with the arts of stitching and embroidering. The Domains were purchased / registered by Ana Bove as early as 2002 with intent of creating a web-based business, as well as making her name and work known among the stitching and embroidering enthusiasts worldwide. Letters ABC, prominent in the domain names were intended as abbreviation of Ana's name and mark "Anna Bove Collections."

Over the course of the next several years, Ana Bove expended tremendous work and creative energy to build the domains from the ground up into a successful and rapidly growing online business. The services offered under the domain names/marks included, among others, the sales of stitching/embroidery supplies, as well as unique stitching/embroidery designs, created by Ana Bove.

As business continued to grow, Ana's name, as well as the domains, their services, marks and designs became widely known and famous in stitching/embroidery industry worldwide, and particularly in the United States. Ana's marks became famous marks within the meaning of the federal Anti-Dilution Act, 15 USC 1125(c).

In 2004-2005, Ana resided outside the United States, and expansion of Ana's business was particularly rapid in the United States. For this reason, Ana started looking for US-based payment processing/accounting and warehouse services for her business. Your offer to provide such services was accepted by Ana because of your US residence, status as close relatives and Ana's trust in honesty and integrity of her relatives. As you know, in 2004 and 2005, Ana transferred a considerable amount of money onto your account for inventory procurement and as remuneration for your services.

As your US services initiated, Ana remained outside the US, continually working on improving the Domain design, structure and content, managing client relations, and all other facets of her growing business other than US financial and legal matters in which she relied on your representations.

Not being a US citizen, Ana lacked the mastery of the English language and knowledge of US law and business customs. In flagrant breach of decency and your fiduciary duties, you utilized these weaknesses to continually misrepresent the state of financial affairs with intent to induce Ana to take only the minimal amounts of income for personal use. All, while you used Ana's company profits for your own personal benefit and profit. In betrayal of trust and violation of fiduciary duties, in an attempt to convert Ana's business and property to yourself, you added your personal names to legal documents and filings that you promised to file in Ana's name. Your actions culminated in unlawfully usurping all control over the domains and the eBay store by changing the passwords and registrations of the domains. Such actions constitute conversion and fraud under the New York civil law. Such actions also constitute cyberpiracy and other violations under federal Lanham Act (15 USC 1125(d)).

Ana Bove never transferred to you any of the rights in intellectual property created by her, or created for her by others as work for hire. Ana Bove is the sole owner and proprietor of all stitching and embroidery designs, images, textual contents, advertising letters, texts, marks, slogans and other creative works that you continue to utilize in connection with eBay sales and converted domains. Aforesaid acts violate Ana Bove's exclusive rights under §106 of the Copyright Act of 1976, 17 U.S.C. §106, and constitute infringement of her copyrights. Your past and continuing copying, distribution and sale of our client's

copyrighted works constitutes a willful and deliberate infringement and is causing irreparable harm and damage to our client

Your past and continuing use of Ana's name in commerce constitutes the violation of Ana's rights of privacy and publicity in violation of New York Civil Rights Law 50, 51 and New York common law.

Furthermore, your use of Ana's name and marks, including, but not limited to "abc-cross-stitch-patterns.com", "abc-cross-stitch-patterns", "abc-embroidery-designs.com", "abc-embroidery-designs", "ThreaDelight" "ABC ALL CONSULTING", "ANA BOVE COLLECTIONS", Visual impressions / trade dress of the website and products, and famous designs, constitute multiple cases of willful trademark infringement in violation of Section 32 of the Lanham Act, 15 USC 1114, unfair competition, false representation, false endorsement, false designation of origin and trademark infringement in violation of Section 43(a) of the Lanham Act, 15 USC 1125(a), trademark dilution in violation of Section 43(c) of the Lanham Act, 15 USC 1125(c), and trade dress infringement, among others. Please notice that federal Lanham Act provides, in cases of trademark infringement, for money damages, preliminary and permanent injunctive relief, and in appropriate cases of willfulness, recovery of treble (3X) damages and reasonable attorneys' fees.

Your actions in taking over and denying access to our client's domain, as well as the continuing deceit of customers and users of the Domains and the eBay store, as to the ownership, control and origin of services, further constitutes unfair competition and false advertising under New York and federal law, and unjust enrichment at the expense of our client, in violation of New York common law.

Our client has already been substantially and irreparably damaged, and continues to be damaged by your control over the domains and the eBay store, and the ongoing violation of our client's rights of publicity, intellectual property and other rights.

We request that you immediately cease and desist from using our client's eBay store, domains, trademarks and copyrighted materials. In order to mitigate further damage to our client, the following actions on your part are required:

1. Immediate cessation of use of our client's name, initials, eBay store, domains, all trademarks and all copyrighted materials.
2. Immediate transfer to our client of all logins, passwords, and other information necessary for our client's access and unimpeded use and assumption of control over the domains and the eBay store.
3. Accounting / Auditing to Ana Bove for all of the sales and/or income/monetary transfers received by you in connection with the domains, the eBay store, and by ABC ALL CONSULTING, INC., (aka ANNA BOVE COLLECTIONS, Inc.) and any other corporations created for or in connection with Ana Bove's name or business, since your first performance of services in 2004.
4. Payment to our client of the actual damages suffered by her as a result of your withholding of the funds. Damages for withholding and/or conversion of the funds

FROM

(TUE) JUN 24 2008 1:32/ST. 1:31/No. 7532369170 P 5

are currently estimated to be at least \$1,000,000 (one million dollars), and continue to accrue.

A written affirmation and proof of compliance with the above requirements must be received by our law firm, in writing, no later than June 20, 2008. Unless we receive your reply, in writing, by this date, we will presume that you do not intend to voluntarily take the necessary actions outlined above. Please be advised that we have been instructed to take the necessary appropriate steps to enforce our client's rights.

Ana Bove expressly reserves all of her rights and remedies in regard to this matter and this letter shall not constitute or be construed to in any way constitute a waiver of any rights of Ana Bove.

We look forward to your prompt response.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alexey Bakman", with a long horizontal flourish extending to the right.

Alexey Bakman, Esq.

EXHIBIT G



ABC EMBROIDERY DESIGNS

To order, please use our secure
online shopping cart, or just
CALL toll free: 877-870-5286
(for ordering only)

ABC machine embroidery designs & polyester embroidery thread!

embroidery designs sets

Embroidery Fonts &
Embroidery Alphabets

Machine Embroidery
Designs

Applique Embroidery
Designs

Cutwork Designs

Easter Embroidery
Designs

Christmas Embroidery
Designs

Cross Stitch Designs

Lace Embroidery Designs

embroidery supplies

Embroidery Threads
Polyester Embroidery
Thread

Rayon Thread

Metallic Thread

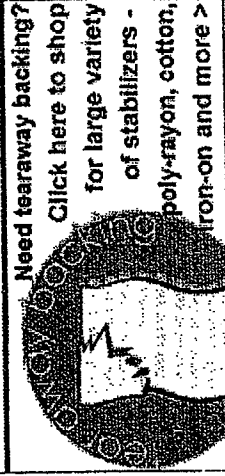
Variegated Thread

To shop for all of our machine embroidery designs, ThreaDelightT polyester embroidery thread, rayon thread & metallic embroidery thread, prewound bobbins, embroidery stabilizers and commercial embroidery supplies, please use the left vertical menu. We have **FREE SHIPPING** on all embroidery supplies within US.

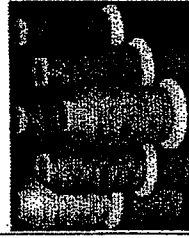
To learn more about ThreaDelightT polyester embroidery thread scroll down.

You're welcome to download several machine embroidery freebies and try them, to see how beautifully they embroider. All designs (except of free ones) may be purchased in downloadable version as well as on CD. We don't charge s/h for downloadable version. You may order custom CD shipped UPS for only \$9.60. We can write as many designs as you order on it. One CD may include over 50 collections, to save you s/h and CD creation fees.

TEARAWAY BACKINGS



EMBROIDERY THREAD KITS



Matching Bobbins & Top
Polyester Thread Kits
Embroidery Stabilizers
Prewound Bobbins
*NEW Bobbin Thread
Commercial Supplies
Card Writers
Thread Nets

special offers

What's NEW

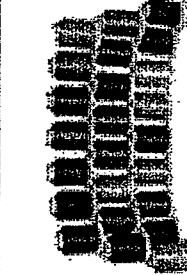
Now On Sale

Embroidery Designs
Combo Packs
Package Deals
Combo Font CDs
Try Free Designs

more info

Embroidery Tips
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BOBBIN THREAD



Click here to shop
for 60wt thread.
Bobbin Thread in
24 colors. Also
available in white
and black

MATCHING THREAD KITS



Click here to shop
for Matching Bobbins
& Top Poly thread.
Top Thread available
in 60wt and 40wt.

EMBROIDERY DESIGNS



Click here to shop
for machine embroidery
designs for different
occasions.

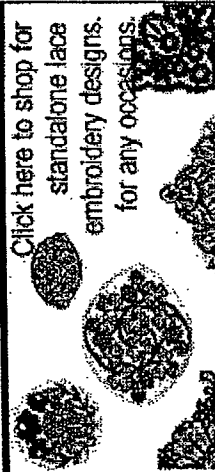
NEW EMBROIDERY FONTS



Click here to take a look
at our stunning
collection of fonts
and alphabets.
Personalize Your
Gifts with us.

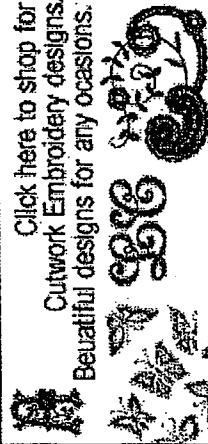
>>>

LACE EMBROIDERY DESIGNS

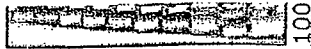


Click here to shop for
standalone lace
embroidery designs.
for any occasions.

CUTWORK DESIGNS



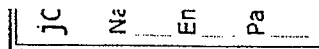
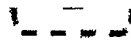
Click here to shop for
Cutwork Embroidery designs.
Beautiful designs for any occasions.



100



Th



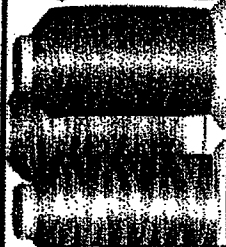
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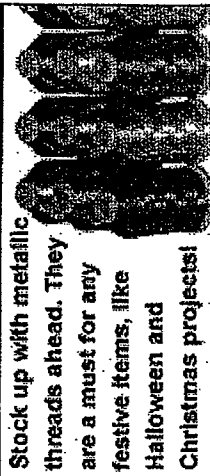
6/25/2008

MULTICOLOR THREAD

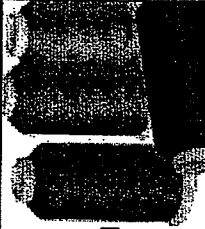
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for variegated thread
in 40 vibrant color
combinations. The
thread is strong &
lustrous, 100% poly!

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**Embroidery
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a quality filament
polyester
thread for machine
embroidery

METALLIC THREAD

Stock up with metallic
threads ahead. They
are a must for any
festive items, like
Halloween and
Christmas projects!

5500-yds THREAD CONES

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great POLY thread
colors on 5500-yard
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Polyester embroidery thread is the most popular thread used for home and commercial machine embroidery, because it's strong, colorfast, durable in laundry and wearing, practically NON-shrinking and can be purchased in huge variety of colors. When comparing each of these five properties of polyester embroidery thread to parallel qualities of rayon and cotton, poly wins every time. It breaks less than the other two, doesn't fray, doesn't bleed, keeps its color in heavy laundry, and can perform great without breaking even on very high embroidery speeds.

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Anna Bove Collections, Inc.**Your Shopping Cart**

Item	Options	Quantity
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(for ordering only)

ABC machine embroidery designs & polyester embroidery thread!

ABC-embroidery-designs.com is a sister site of ABC-cross-stitch-patterns.com.

After launching our first web site (ABC-cross-stitch-patterns.com) and maintaining it for a while, we were seduced to expand from designs in machine cross-stitch to other styles and techniques. Although at the beginning it was mainly due to lots of requests from our existing customers, digitizing designs for regular machine embroidery appeared to be much more exciting than we have ever thought it to be, and the results are very appealing too. So we felt that the new designs deserve a separate "home" from the machine cross-stitch site:))

This time we have much more considered the needs of 4x4 inch hoop owners, which was always a problem in cross stitch style, especially with the fancier and more complicated designs. Almost all designs in regular machine embroidery technique are perfectly suitable for small hoops and are readily available in SEW & PCS formats (as well as in many others - Pes, Art, Hus, Vip, Shv, Exp, Dst, Xxx, Jef).

We have discovered that many designing techniques that can be made in cross-stitch are very hard or almost impossible to achieve in regular machine embroidery, and of course the opposite. When we start digitizing a particular design, we try to choose the best technique to show the original artwork's beauty. That's why you will notice that we have absolutely different collections on the two "ABC" sites, they almost never are alike, and unfortunately we can't "convert" cross stitch designs to regular satin stitch machine embroidery and the opposite:))

We will add new collections often, we almost always have something "in stock" that is not yet listed. Each and every design is test-stitched until it sews out perfectly, so "what you see" on the pictures is "what you get". Many designs even look more beautiful "in life" than on the pictures. In case you are looking for a particular design, please don't hesitate to email us. Even if we don't have it at this very moment, it may be a good idea for future designs set, and we always seriously consider your wishes and requests.

We wish you a wonderful day & happy stitching!

Kindest Regards,

embroidery designs sets

**Embroidery Fonts &
Embroidery Alphabets**

**Machine Embroidery
Designs**

**Applique Embroidery
Designs**

Cutwork Designs

**Easter Embroidery
Designs**

**Christmas Embroidery
Designs**

Cross Stitch Designs

Lace Embroidery Designs

embroidery supplies

**Embroidery Threads
Polyester Embroidery
Thread**

Rayon Thread

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6/25/2008

Matching Bobbins & Top
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special offers

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Now On Sale

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Combo Packs
Package Deals
Combo Font CDs
Try Free Designs

more info

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Embroidery Projects
Help - Q & A
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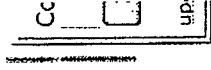
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Toll Free (for ordering only!): 877-870-5286

If you call before or after 9AM - 5PM Eastern Time, please just leave a message with your name, phone # and best time to reach you. We'll call you back and write down your order.

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EXHIBIT H



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COUNTED CROSS-STITCH PATTERNS - CROSS-STITCH CHARTS IN PDF FORMAT

[Top 100 Cross-Stitch Sites](#)

- Free Cross-Stitch Patterns
- ABC Samplers
- Alphabets & Monograms

Ancient Egypt

Angels

Birds

Christmas

Dogs

Easter

Flowers

Fruits & Berries

Greetings

Halloween

Holidays

Magic

Marine Motifs

Babies & Kids

Native American

Patriotic

Romance & Valentine

Teddy Bears

Wedding

Cross-Stitch Projects

Welcome to A.B.C. Cross Stitch Patterns!

Machine embroider? [Click here](#) to move to machine embroidery & machine cross stitch site.....

On ABC-cross-stitch-patterns.com you may find tens of vintage style **counted cross-stitch patterns in PDF format**. A few are available for free download, most are for sale. Here you may see [how the counted cross-stitch patterns are provided](#), and how they should be printed out.

Before you shop for patterns, be sure to download and try [free cross-stitch charts](#). The free patterns are exactly similar to paid ones, so once you look at a freebie, you'll understand what a paid pattern is going to be like.

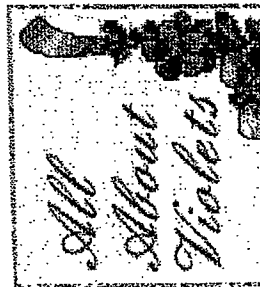
You may browse the entire patterns catalog via the left menu. We mainly specialize in floral and holiday themes, so these two subjects are VERY well presented. There are some other pattern themes available, too - Art Nouveau, Native American, Marine, Birds, Magical creatures etc. Browse and see by yourself. Good luck!

P.S.

Once you purchase patterns, they will be emailed to you within 24 hours after your order is processed. If you don't receive them within 24 hours - please check your Spam folder. In case the email with download links is not there, [let us know at once](#).

And here are shortcuts to pattern sets, that are most popular at this time of the year:

All About Violets Set



11
Patterns
Hoop:
5x7 &
more
Price: \$24.00

Spring Delights Set




6
Patterns
Hoop:
5x7 &
more
Price: \$17.50

Roses Allure



25
Patterns
Hoop:
4x4 to
6x10
Price: \$29.00

 Keep up with special offers, news, free designs, tips etc

Name:

Email:

Password:

Confirm Password:

update subscription

[Read More...](#)

Vintage Easter Set



6 Patterns
Hoop: 5x7 & more

Price: \$21.00

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[Read More...](#)

Funny Bunny & Co Set



7 Patterns
Hoop: 4x4 & more

Price: \$13.00

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[Read More...](#)

Colorful Easter Set



6 Patterns
Hoop: 5x7 & more

Price: \$17.50

[Read More...](#)