

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>ENTREPRENEUR MEDIA, INC.,</b>	)	
2445 McCabe Way, Suite 400	)	Civil Action No. 1:11-cv-00583-
Irvine, California 92614	)	AJT-TCB
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
<b>B-ENTREPRENEUR.COM &amp; S-</b>	)	
<b>ENTREPRENEUR.COM, each an Internet</b>	)	
<i>Domain Name,</i>	)	
	)	
Registrants:	)	
	)	
Pamela Lynn	)	
2445 McCabe Way, Suite 400	)	
Irvine, CA 92614	)	
B-ENTREPRENEUR.COM &	)	
	)	
Entrepreneur Inc.	)	
Verita Powell	)	
2445 McCabe Way, Suite 400	)	
Irvine, CA 92614	)	
S-ENTREPRENEUR.COM	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR AN ORDER  
TO PUBLISH NOTICE OF ACTION**

Plaintiff Entrepreneur Media, Inc. (“Plaintiff”) respectfully moves this Court for an Order under 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(bb) directing that Plaintiff publish notice of this action in *The Washington Times* within fourteen (14) days after entry of the Order.

Plaintiff has filed an *in rem* civil action alleging a cybersquatting claim against the Internet Domain Names b-entrepreneur.com and s-entrepreneur.com (collectively, the “Defendant Domain Names”) in this District, where the domain name registry is located, because Plaintiff is not able to obtain *in personam* jurisdiction over the owners of the Defendant Domain Names. 15 U.S.C. § 1125(d)(2)(A)(I). The Anticybersquatting Consumer Protection Act of

1999 (the “ACPA”) specifically provides that service of process in an *in rem* action is made by “sending a notice of the alleged violation and intent to proceed under this paragraph to the registrant of the domain name at the postal and email address provided by the registrant to the registrar” and “publishing notice of the action as the court may direct promptly after filing the action.” 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa) & (bb). Accordingly, Plaintiff hereby submits this Motion to Publish in accordance with 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(bb).

In further support of this Motion, Plaintiff submits the accompanying Memorandum.

Dated: August 26, 2011

Respectfully submitted,

/s/ Tara Lynn R. Zurawski

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*Counsel for Plaintiff Entrepreneur Media, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of August, 2011, I will electronically file the foregoing with the Clerk of the Court using the EC/ECF system and that a true and correct copy of the foregoing and a copy of the Notification of Electronic Filing (NEF) were sent to the following non-filing users by first class mail and electronic mail:

**REGISTRANTS:**

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By: /s/ Tara Lynn R. Zurawski

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