

# COVINGTON & BURLING

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May 10, 2006

## **BY EMAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED**

Nathan Lyle  
The U.P. Web Maestro  
615 Jopling  
Ishpeming, Michigan 49849

Email: [nathanlyle@upwebmaestro.com](mailto:nathanlyle@upwebmaestro.com)

Re: SUPERIORPAGES.COM Domain Name

Dear Mr. Lyle:

This firm is trademark counsel to Verizon Directories Corp. (“Verizon”), which, as you undoubtedly know, produces the Internet’s preeminent online directory and shopping resource under the marks SUPERPAGES and SUPERPAGES.COM and is a leading publisher of yellow pages print directories under the mark SUPERPAGES.

Verizon is the owner of federal registrations for the marks SUPERPAGES (Reg. No. 2,022,484) for “electronic telephone directory services,” and for the mark SUPERPAGES.COM (Reg. No. 2,765,993) for “electronic telephone directory services, and dissemination of advertising of others via an online communications network,” and a pending application for the mark SUPERPAGES (Ser. No. 78/195,699) for “advertising services, namely promoting the goods and services of others by means of telephone directories; dissemination of advertising for others via an online communications network.”

Verizon is also the owner of the domain name SUPERPAGES.COM, through which it provides a variety of services under the SUPERPAGES and the SUPERPAGES.COM marks (hereinafter, the foregoing marks shall be collectively referred to as the “SUPERPAGES Marks”). These services include electronic telephone directory and advertising services; online shopping services; Internet directory services; Internet service provider services and other Internet access services; web design and hosting services; domain name registration services; domain name leasing services; maps and driving directions; electronic postcard services; online bookstore services; and Internet tutorials.

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Verizon has used and promoted its SUPERPAGES Marks extensively since at least as early as April 15, 1996. As a result of these efforts and of its continuous and extensive use and promotion of the SUPERPAGES Marks, the SUPERPAGES Marks are widely recognized by the public, including Internet users and online businesses, and have acquired substantial goodwill as marks identifying Verizon and its electronic telephone directory and advertising services, its yellow pages print directories, and other related services.

Verizon has become aware that The U.P. Web Maestro has registered the domain name SUPERIORPAGES.COM. Although the SUPERIORPAGES.COM domain names appears to parked, the web site offers links for domain registration and web hosting that direct Internet users to the The U.P. Web Maestro website. Verizon is concerned that The U.P. Web Maestro's registration and use of the SUPERIORPAGES.COM domain name will divert Internet traffic away from Verizon's SUPERPAGES.COM web site, will cause confusion among consumers attempting to reach Verizon's web site, and will lead consumers to believe, erroneously, that SUPERIORPAGES.COM is provided, sponsored or approved by Verizon, or that The U.P. Web Maestro is somehow affiliated with Verizon.

Verizon accordingly requests that The U.P. Web Maestro transfer the domain name registration for SUPERIORPAGES.COM to Verizon. Please advise us in writing whether you agree to do so. Verizon would appreciate your cooperation in connection with this matter and, of course, reserves all rights in the event that you do not agree to this request.

Sincerely,



Hope I. Hamilton

cc: Janis Manning, Esq.