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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

HAVASUPAI TRIBE OF ARIZONA, a
federally recognized Indian tribe,

Counterclaimant,

v.

Richard J. Nicolaus, DBA AZNETCO,

Counterdefendant.

Case No. CV-13-8025-PCT-JJT

**APPLICATION FOR WRIT OF
EXECUTION FOR
NONMONETARY JUDGMENT**

Counterclaimant, Havasupai Tribe of Arizona, hereby applies for a writ of execution ordering the transfer of the domain names havasupaifalls.net and havasuwaterfalls.com (collectively, the “Infringing Domain Names”) to Counterclaimant based on the following grounds:

1. That on November 21, 2014, the Honorable John J. Tuchi issued an Order requiring Counterdefendant to immediately transfer all domain names currently controlled by Counterdefendant that infringe on any of

Counterclaimant's Marks, including havasupaifalls.net and havasuwaterfalls.com.

2. That as of March 11, 2015, Counterdefendant has failed to transfer the Infringing Domain Names to the Havasupai Tribe and the Infringing Domain Names continue to be controlled by Richard Nicolaus, whether individually or through his agent Doris Nicolaus.
3. That the Havasupai Tribe is entitled to immediate control of the Infringing Domain Names.
4. That FastDomain, Inc. is the registrar of the domain name havasupaifalls.net and, as registrar, FastDomain, Inc. has the ability to transfer ownership of havasupaifalls.net to the Havasupai Tribe.
5. FastDomain Inc.'s address is 560 Timpanogos Parkway, Orem, Utah 84097.
6. That eNom is the registrar of the domain name havasuwaterfalls.com and, as registrar, eNom has the ability to transfer ownership of havasuwaterfalls.com to the Havasupai Tribe.
7. eNom's address is 5808 Lake Washington Boulevard, NE, Suite 300, Kirkland, Washington 98033.

Based on the foregoing, Counterclaimant respectfully requests that a writ of execution be issued ordering FastDomain, Inc. and eNom to immediately transfer ownership and control of havasupaifalls.net and havasuwaterfalls.com to the Havasupai Tribe.

1 RESPECTFULLY submitted this 11th day of March, 2015.

2 ROTHSTEIN, DONATELLI, HUGHES,
3 DAHLSTROM & SCHOENBURG, LLP

4 By s/ Denten D. Robinson

5 *Attorney for Counterclaimant Havasupai*
6 *Tribe*