

Resolution Institute

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DOMAIN NAME DISPUTE COMPLAINT

Application Form under the .au Dispute Resolution Policy (auDRP)

COMPLAINANT DETAILS

Complainant name:	Ian du Plessis, trading as The Cruiser Store
ABN/ACN:	74 692 085 180
Contact person:	Ian du Plessis
Phone number:	0482916231
Fax number:	N/A
Email:	ianduplessisa@gmail.com / info@thecruiserstore.com
Preferred method of communication:	Electronic

Representative authorised to act for Complainant:

Contact person:	Anja Pich, Managing Lawyer
Address:	Lawpath Legal Pty Ltd, 81-83 Campbell Street, Surry Hills NSW 2010
Phone number:	0430195780
Fax number:	N/A
Email:	anja.pich@lawpath.com.au
Preferred method of communication:	Electronic

RESPONDENT DETAILS

Respondent name:	445 Pty Ltd
ABN/ACN:	ACN 685 124 949 / ABN 83 685 124 949
Contact person:	Michael McFarland
Address:	Surry Hills, NSW
Fax:	N/A
Email:	domains@ausmedia.biz / info@cruiserstore.au
Preferred method of communication:	Electronic

Representative authorised to act for Respondent:

Not known at time of filing.

DETAILS OF DOMAIN NAME/S IN DISPUTE

Domain name/s in dispute:	cruiserstore.au
Registry Domain ID:	8b865fb05a1e4ae4abcb58385b770961-AU
Registrar:	Synergy Wholesale Accreditations Pty Ltd (Nexigen Digital)
Panel:	One (1) Panellist
Copy sent to Respondent:	No (to be served by Resolution Institute upon filing)
Remedy sought:	Transfer of the domain name cruiserstore.au to the Complainant
Mutual Jurisdiction:	New South Wales, Australia

SUPPORTING EVIDENCE

The following documents are attached to this complaint:

1. Complaint submission (9 pages) addressing the grounds under the auDRP
2. Annexure A - Complainant's rights and trading history
3. Annexure B - Respondent identification and WHOIS records
4. Annexure C - Cease and desist correspondence
5. Annexure D - Lack of legitimate interest evidence
6. Annexure E - Actual market confusion and supplier evidence
7. Annexure F - Copying evidence
8. Annexure G - Timeline and current evidence
9. Annexure H - SEO traffic diversion report (StudioHawk, 20 July 2026)
10. Annexure I - Pattern of conduct evidence (summit4x4store.au)

PAYMENT

Fee:	\$2,000 + \$200 GST = \$2,200 (single domain, single panellist)
Payment method:	Credit card
Bank details:	Resolution Institute BSB: 082-057 Account: 51-782-4272

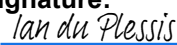
DECLARATION

The Complainant hereby requests that the complaint be submitted for decision in accordance with the .auDRP Policy, Rules and Resolution Institute Supplemental Rules.

The Complainant will submit, with respect to any challenges, to a decision in the administrative proceeding cancelling or transferring the domain name, to the jurisdiction of the courts in at least one specified Mutual Jurisdiction.

The 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 dispute resolution Provider and panellists, except in the case of deliberate wrongdoing; (b) the registrar; (c) the registry administrator; and (d) auDA, as well as their directors, officers, employees, and agents.

The Complainant certifies that the information contained in this complaint is to the best of the Complainant'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.

Complainant name: Ian du Plessis	Signature:  Ian du Plessis (Jul 29, 2026 16:26:43 GMT+10)	Date: 29/07/2026
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RI Cover Sheet - cruiserstore FINAL

Final Audit Report

2026-07-29

Created:	2026-07-29
By:	Anja Pich (anja.pich@lawpath.com.au)
Status:	Signed
Transaction ID:	CBJCHBCAABAAF-D_QEKSy5VvdmZIZhaQJdTIL5GM3XnU

"RI Cover Sheet - cruiserstore FINAL" History

 Document created by Anja Pich (anja.pich@lawpath.com.au)

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 Email viewed by Ian du Plessis (ianduplessisa@gmail.com)

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 Document e-signed by Ian du Plessis (ianduplessisa@gmail.com)

Signature Date: 2026-07-29 - 6:26:43 AM GMT - Time Source: server - Signature Appearance Selected: TYPE

 Agreement completed.

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