

**Draft – Statement of Claim – Civil Action Outline**

*(For Attorney Review Only)*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

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**SELIM ERMAN DURANAY,**  
Individual Claimant,  
Plaintiff,

v.

**NETWORK SOLUTIONS, LLC,**  
a Florida Limited Liability Company,  
Defendant.

Case No.: \_\_\_\_\_

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**STATEMENT OF CLAIM**

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**I. JURISDICTION AND VENUE**

1. This action arises under the laws of the United States and the State of Florida.
  2. Defendant **Network Solutions, LLC** is a Florida-registered limited liability company with its principal place of business at **5335 Gate Parkway, 2nd Floor, Jacksonville, FL 32256**, and is therefore subject to the jurisdiction of this Court.
  3. The events giving rise to this action occurred within this judicial district. Venue is proper pursuant to **28 U.S.C. §1391(b)**.
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**II. PARTIES**

**Plaintiff:**

Selim Erman Duranay  
Meksika Cad. 37/51  
Çankaya, Ankara, Türkiye  
Tel: +90 534 231 80 56  
Email: [selimerman@gmail.com](mailto:selimerman@gmail.com)

**Defendant:**

Network Solutions, LLC  
5335 Gate Parkway, 2nd Floor  
Jacksonville, FL 32256, USA

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### III. FACTUAL BACKGROUND

1. On or about **June 26, 2025**, Plaintiff placed a valid **backorder** for the domain name **KIZILAYAVM.COM** through Network Solutions' official backorder system.
  2. At the time of the backorder, the domain was entering the *Pending Delete* period and was eligible for re-registration in accordance with ICANN policy.
  3. On **June 21, 2025**, prior to public availability, the domain was **internally registered under Network Solutions' own infrastructure** or through its affiliate registrar **NamePal.com #8009, LLC**.
  4. Subsequent to the backorder, the domain resolved to a Network Solutions-branded "Under Construction" page, confirming internal control by the Defendant.
  5. Plaintiff contacted Network Solutions on multiple occasions to clarify the ownership and transfer status of the domain. Support transcripts (cases **E-367818**, **I-21900318**, **I-22004831**) confirm that the domain was being "held by the backorder team" pending the ICANN 60-day lock period.
  6. After the lock period expired, the domain was **not released, transferred, or auctioned**, in direct violation of ICANN's **Registrar Accreditation Agreement (RAA)** and **Transfer Policy**.
  7. Defendant continues to unlawfully retain possession of the domain and benefit from it commercially, denying Plaintiff his rightful ownership.
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### IV. CAUSES OF ACTION

#### COUNT I – BREACH OF CONTRACT

8. Plaintiff entered into a contractual agreement with Defendant by purchasing a valid backorder for the domain name **KIZILAYAVM.COM**.
9. Defendant breached the contract by failing to deliver or transfer the domain as agreed and by unilaterally retaining it for its own use.
10. Plaintiff suffered financial loss and reputational harm as a result.

#### COUNT II – BREACH OF ICANN REGISTRAR OBLIGATIONS

11. Defendant violated the ICANN **Registrar Accreditation Agreement (RAA §3.7.7.9)** and **Transfer Policy (Section I.A)** by failing to handle the backorder in good faith and by not executing the transfer after the mandatory lock period.

#### COUNT III – UNJUST ENRICHMENT

12. Defendant was unjustly enriched by retaining control and potential resale value of the domain, which rightfully belongs to Plaintiff.

#### COUNT IV – UNFAIR AND DECEPTIVE BUSINESS PRACTICES (Florida Statutes §501.204)

13. Defendant engaged in deceptive conduct by misrepresenting the availability and process of the backorder service, resulting in loss to the Plaintiff and financial benefit to the Defendant.
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## V. DAMAGES

14. Plaintiff demands **compensatory and consequential damages** in the amount of **USD 100,000 (One Hundred Thousand U.S. Dollars)** for losses directly resulting from Defendant's unlawful actions.
15. Plaintiff also seeks any additional relief the Court deems just and proper, including transfer of ownership of the domain *KIZILAYAVM.COM*.

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## VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Order the immediate transfer of the domain name *KIZILAYAVM.COM* to Plaintiff;
2. Award **USD 100,000** in compensatory and consequential damages;
3. Award costs of this action and reasonable attorney's fees; and
4. Grant such other and further relief as the Court deems proper.

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**Respectfully submitted this 1st day of November, 2025.**

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Sincerely,  
**Selim Erman Duranay**  
*Individual Claimant*  
Ankara, Türkiye