

IN THE COURT OF COMMON PLEAS OF  
FRANKLIN COUNTY, OHIO  
369 SOUTH HIGH STREET  
COLUMBUS OH 43215

FILED  
COMMON PLEAS COURT  
FRANKLIN CO. OHIO  
2011 JUN -9 AM 9:06  
CLERK OF COURTS-CV

CASE NO: 11 CVC 04-4434

YEAGER, ANN M.  
3546 STEUBENVILLE RD SE  
AMSTERDAM OH 43903  
TEL: NONE  
PLAINTIFF, PRO SE

PETITION AMENDED TO ADD  
DEFENDANT, ARA E CHEKMAYAN,  
CLARIFYING AT LEAST ONE  
UNKNOWN REGISTERING PARTY/IES  
OF PLAINTIFF'S COPYRIGHTED  
TRADENAME, AYPRESS, AS A DOMAIN  
NAME

V.

GODADDY.COM ET AL  
DEFENDANTS

Plaintiff hereby amends said Petition, to add Ara E Chekmayan, as a Defendant to original Petition, filed in the aforesated Court, April 7, 2011.

Plaintiff re-discovered Ara E Chekmayan, as register/administrator of aypress.com, through an Internet search engine performed May 24, 2011—which shows Mr. Chekmayan still being connected to said domain; prior to Defendant, Ibrahim Kazanci, as the current register of said domain.

1. Internet search shows Mr. Chekmayan's—is located in Manhattan, New York. A mylife.com webpage (dated May 24, 2011) shows an unknown register, male, 33, living in New York, using the original spelling of the Plaintiff's copyrighted trade name, Ay Press.

2. May 24, 2011 Internet searches show the Plaintiff's original spelling of said trade name, Ay Press—exists on the web.

3. Any person who uses the exact spelling, in any of the Plaintiff's transitional spellings, from the first use of Ay Press (clearly broken apart) to AyPress (closing the gap) to Aypress (lowering the letter P)—is intentionally attempting to mislead the general public as to ownership of said copyrighted trade name, and capitalize on the public's confusion.

4. The unauthorized registration of Plaintiff's copyrighted word, immediately led to confusing the Plaintiff with the Defendant. The general public could not possibly or reasonably know the Plaintiff and

Defendant are separate, when the Plaintiff's trademark and copyrighted word used as a domain name on the Internet, in which the Defendant, clearly labeled the word her trademark on the copyright page of two books.

5. Plaintiff advertised said business name, Aypress, to the book publishing industry, including synonymously marketing Aypress and Aypress.com; Did register Aypress as a trade name with the State of Ohio; Did use Aypress.com on the copyright page of said books, as well as dust jackets; Advertised Aypress on her business cards; And advertised Aypress.com, in an 2003 ad in the publishing industry's trade publication: *Publisher's Weekly*.

6. Defendant used said name to redirect traffic from the Plaintiff's business, capitalizing on the Plaintiff's financial investment into advertising her business, by a word the Plaintiff coined: Aypress.

7. No person viewing any business on the Internet, would know the Plaintiff and Defendants were different—except for the Plaintiff and Defendants—even if the content of the webpage changed.

8. Plaintiff prior registered Aypress.com through a third party, who was listed as the administrator for said domain; therefore, any person listed as an administrator would not be thought to be the owner.

9. The illegal taking of the Plaintiff's domain to capitalize on traffic and confusion—occurred after the Plaintiff's first year in business, and less than a year after said books were published and remitted to bookstores, including chains such as Barnes and Noble and Borders



---

ANN YEAGER, PLAINTIFF, PRO SE

I certify that a copy of this Amended Petition to add a Defendant, has been remitted to the Defendants.



---

ANN YEAGER, PLAINTIFF, PRO SE

Jones Day  
325 John H McConnell Boulevard  
Suite 600  
Columbus OH 43215-43215-2673  
Representing Defendant, ICANN

Thompson Hinc  
312 Walnut Street  
14<sup>th</sup> Floor  
Cincinnati OH 45202-4089  
Representing Defendant Go Daddy Group

Ibrahim Kazanci  
P O Box 67158  
Calgary Alberta T2L 2L2  
Canada

Ara E Chekmayan  
New York NY  
Tel: 212-794-0002

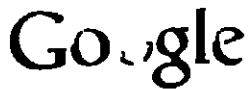
Remitted through the Clerk's Office of the Franklin County Court of Common Pleas,  
Ohio

EXHIBIT A

Ara E Chekmayan  
Internet Search Enginge  
Proof – associated with  
Aypress –  
Plaintiff's copyrighted trade name

Web Images Videos Maps News Shopping Gmail more ~

Sign in



aypress

Search

Page 23 of about 4,690 results (0.17 seconds) Advanced search

Everything

Images

Videos

News

Shopping

Books

More

Alliance, OH

Change location

Show search tools

Something different

pine

poplar

cedar

cottonwood

sycamore

Filipino Civil Engineers : Message: Re:

[Filipino Civil Engineers ...

- [ Translate this page ]

24 Feb 2011 ... kaya po tinama ko, Review Center  
HERE in Manila, anyways yun ay "press release" lang  
nila meaning hindi po ako sure kaya nga po may may  
open ...  
tech.dir.groups.yahoo.com/group/Filipino\_Civil\_Engineers/.../4728  
- Cached

Aupres.com.cn - Aupres

aypres.com.cn, aupres.com.cn, ayupres.com.cn,  
auupres.com.cn, apres.com.cn, au0res.com.cn,  
aup0res.com.cn, au0pres.com.cn, aumres.com.cn,  
aupmres.com.cn ...  
www.buzzmystat.com/www.aupres.com.cn - Cached

Second Story Books | Browse Poetry

Amsterdam, OH: Aypress 2000?, first. More Info ✓  
Inquire. [Book #7-36-669439]. Add to Cart. Price:  
\$12.00 save 25%\$9.00 ...  
www.secondstorybooks.com/searchResults.php?.. -  
Cached

[Released] Cwcheat 0.2.3 & PSP Cheat-Up

0.31 (All CWCheats ... - [ Translate this page ]

... press ko yung select cheats nagfrefreeze yung  
screen. ang pede mo lang gawin ay press O button  
para bumalik sa cwcheat menu. ganito yung itsura  
niya: ...  
pinoypsp.com/index.php?topic=199327.75 - Cached

Ambassador Yellow Pages Announces

Spanish Language Directory For ...

Sep 19, 2004 ... Contact Information. Name: Tactical  
Public Relations. Email: \*\*\*@tacticalpr.com. WebSite:  
http://www.tacticalpr.com, www.aypress.com ...  
www.free-press-  
release.com/news/200409/1095633654.html - Cached

[n] 34-10-13 - (Sat) - TODAY ON THE RADIO

e :30-WE AYPres-Radio News. WOENatural History  
TalkJohn. Saunders. WJZPress- Radio News.  
WABCFootballEddie Dooley. WMCA Movie  
NewsBuddy Cantor ...  
www.jjonz.us/RadioLogs/pagesfiles/.../%5Bn%5D34-  
10-13-(Sat).pdf

[PDF] GOT MUSIC? O R D E R T O D A Y !

File Format: PDF/Adobe Acrobat - Quick View  
aypress.org. BIBLE STUDY MATERIALS TO HELP  
YOUR CHURCH ENGAGE IN QUALITY BIBLE  
STUDY. OUR NEWEST ADULT STUDY! GALATIANS  
AND 1 & 2 THESSALONIANS: ...  
www.bgct.org/texasbaptists/Document.Doc?id=7043

This is Google's cache of <http://www.free-press-release.com/news/200409/1095633654.html>. It is a snapshot of the page as it appeared on Mar 28, 2011 06:49:35 GMT. The current page could have changed in the meantime. [Learn more](#)

These search terms are highlighted: **aypress**

[Text-only version](#)

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You are here: [Home](#) [Miscellaneous](#) [Miscellaneous](#) - [Ambassador Yellow Pages Announces Spanish Language Directory For Manhattan](#)

## Ambassador Yellow Pages Announces Spanish Language Directory For Manhattan

September 19, 2004

372

Ambassador Yellow Pages to serve Spanish speaking community with spring 2005 launch of Manhattan Spanish Language Directory

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**FOR IMMEDIATE RELEASE**  
(Free-Press-Release.com) September 19, 2004 – NEW YORK, September 20th /PRNewswire/– New York City based Ambassador Yellow Pages, founded in 1989, has announced today that it will launch Manhattan's first major stand-alone Spanish language directory, Manhattan Páginas Amarillas in Spring 2005.

The Spanish-speaking market place in New York City is vital, vibrant, expanding and currently underserved, reports Kathy Hipple, the company's CEO. "Our goal is to offer a comprehensive Manhattan directory in Spanish

that will serve the Spanish-speaking community and allow businesses to target the Hispanic market in Manhattan."

Ambassador Yellow Pages is no stranger to the Yellow Page business in New York City or to publishing in Spanish. Ambassador has established a significant market share in Manhattan, Brooklyn, Queens, all with directories in English.

This year, Ambassador successfully launched a complete distribution Bronx directory with a Spanish/English flip-book format. Ambassador broke their competitor's hundred-year stranglehold monopoly in The Bronx, where their bilingual book has been an overwhelming success.

The Greater New York Metropolitan Area is home to approximately 10 million people, says Hipple. "Latinos account for roughly one person in ten, making it a million person market. A significant number of these people want quick access to information and would rather get that information in their language of choice which is Spanish."

The company has spent a good deal of time planning their entrée into this market and has developed strategic alliances to assure them of significant penetration there.

As an independent Yellow Pages publisher, Ambassador Yellow Pages pioneering efforts – creating better cost to value ratios, delivering their directories door to door, developing community-centric

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### United States of America

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- [San Francisco](#)
- [Dallas](#)
- [New York](#)
- [Washington](#)

### India, Republic of

- India Main Cities**
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- [NOIDA](#)
- [Ahmedabad](#)
- [Bangalore](#)
- [Coimbatore](#)
- [Bhopal](#)
- [Lucknow](#)
- [Jaipur](#)
- [Hyderabad](#)
- [Calcutta](#)
- [Mumbai](#)
- [Ghaziabad](#)
- [Gurgaon](#)
- [Cochin](#)

directories and seeking to meet the needs of all segments of the city's marketplace -- has put it at the vanguard of the industry.

Nagpur Ludhiana  
Pune Chennai  
Chandigarh New Delhi

Ambassador's progressive approach to the Yellow Pages business includes not only new ways of presenting the Yellow Pages in print and online at [www.AmbassadorYellowPages.com](http://www.AmbassadorYellowPages.com), but also the distribution of its directories on CD Rom. In addition, Ambassador is an authorized reseller of two of the largest Internet Yellow Pages providers, Yahoo! Yellow Pages and Switchboard.com.

More In Miscellaneous

Miscellaneous Popular Industries  
Miscellaneous

The rollout of the Spanish language Yellow Pages in Manhattan is to be followed by similar rollouts in the other boroughs throughout 2005. CONTACT: Ara E. Chekmayan, Tactical Public Relations

0#8

+1-212-784-8757. [ara@tacticalpr.com](mailto:ara@tacticalpr.com)

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SOURCE Ambassador Yellow Pages

Web Site. [www.AmbassadorYellowPages.com](http://www.AmbassadorYellowPages.com).

More information can be found online at <http://www.tacticalpr.com>. [www.aypress.com](http://www.aypress.com)

[free-press-release.com](#) [Spanish directory](#) [Ambassador Yellow Pages](#) [Kathy Hoyle](#) [Yellow Pages](#) [Spanish Language Tactical Public Relations](#)

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Contact Information

Name: Tactical Public Relations  
Email: [\\*\\*\\*@tacticalpr.com](mailto:***@tacticalpr.com)

WebSite:  
<http://www.tacticalpr.com>,  
[www.aypress.com](http://www.aypress.com)

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J. Report Abuse

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Upcoming Trade Show New Press News New Exclusive News More Press News

ASI Advantage Road Show Orlando  
When: 2011.03.28-2011.03.28  
Where: Orlando, United States  
Industry: Business Services



Cards & Payments Australasia  
When: 2011.03.28-2011.03.29  
Where: Sydney, Australia  
Industry: Business Services

Dubai International Humanitarian Aid & Development Conference &...  
When: 2011.03.28-2011.03.30  
Where: Dubai, United Arab Emirates  
Industry: Business Services




Post your news to the World.

E1069 - W8

**We found 1 result for "Ay Press, 33"**

First Name	Last Name	Age	Location (optional)
Ay	Press	33	

Name	Age	Places Lived	Relatives	Schools
 <b>Ay Press</b> <a href="#">View Details</a>	33	New York, NY		

**Showing 1-1 (out of 1) for "Ay Press, 33"**

**Ay Press**

Age: 33



E1069 - W9

[Home](#) | [Member Login](#) | [Join Now](#)

We found 1 result for "Ay Press, 33"

First Name	Last Name	Age	Location (optional)
Ay	Press	33	

**Search Now**

Name	Age	Places Lived	Relatives	Schools
 <a href="#">Ay Press</a> <small>View Details</small>	33	New York, NY		

[View All Results](#)

[View Profile](#)  
[Send Email](#)

Showing 1-1 (out of 1) for "Ay Press, 33"

[View All Results](#)

### Ay Press



**Ay Press**  
Location: BROOKLYN, NY  
URL: [mylife.com/104606719](http://mylife.com/104606719)

Age: 33

[Send an Email](#)

[View Complete Profile](#)

#### Join Now & View the Full Ay Press Profile

Register for FREE at MyLife to find Ay Press or meet Ay Press. Membership lets you view a full Ay Press profile, which can include Ay Press photos, info on Ay Press married or single status, Ay Press company and work history, Ay Press's address and more!

Don't spend another moment without connecting with old acquaintances such as Ay Press, with the assistance of [MyLife.com](http://MyLife.com), your best chance for locating people! End the search for Ay Press from Brooklyn New York at [MyLife.com](http://MyLife.com), the easiest people search tool out there! Make connections in Brooklyn New York that will help advance your career, and create your ultimate social network on [MyLife.com](http://MyLife.com)! Sign up with [MyLife.com](http://MyLife.com), so Ay Press from Brooklyn New York can finally make contact with you! With all the advancements in technology, finding Ay Press has never been easier, with [MyLife.com](http://MyLife.com), your connection to Brooklyn New York!

#### Ay's Friends

[Jeffrey Tinsley](#)

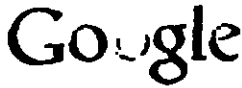
#### People Search

## EXHIBIT B

**Proof Internet Search Engine  
Plaintiff's copyrighted trade name  
same exact spelling**

Web Images Videos Maps News Shopping Gmail more -

Sign in



aypress

Search

Page 9 of about 4,700 results (0.14 seconds) Advanced search

Everything

Images

Videos

News

Shopping

Books

More

Alliance, OH

Change location

Show search tools

Something different

pine

poplar

cedar

cottonwood

sycamore

**Second Adventist youth congress raises money for underprivileged ...**

Aug 11, 2009... musicians lead out during a song service at the second Pan-European Youth Congress, held last week in Munich, Germany. [photo: AY Press] ...  
news.adventist.org/2009/08/second-adventist-you.html - Cached

**Gameplaypress.com - DomainTrakker.com**

gameplaypress.com, gameplaypresse.com, gameplaypress.com, gameplaypresscom, gameplawypress.com ... gameplaypress.co, gameplaypress.com, hameplaypress.com ...  
domaintrakker.com/gameplaypress.com - Cached

**رسالة اعتذار ... - [ Translate this page ]**

دعني لك بالتوفيق والسداد!!! والسلام عليكم ورحمة الله وبركاته التاريخ: كل زمن. aypress في 31 Oct 2009 | Uncategorized | أضف تعليقك ...  
blog.amin.org/aypress/ - Cached - Similar

**PARALUMAN DIED AT 85 – Now What, Cat?**

Apr 28, 2009 ... Si Paraluman ay ina ng dating aktres at ngayon ay Press Undersecretary na si Baby O'Brien at lola ng dating aktres na si Rina Reyes. ...  
blog.cathcath.com/paraluman-died-at-85-5736.html - Cached

**Friendship and Smiles » hot bodies**

Feb 10, 2010 ... March 17 Lin-ay Press Presentation (SM Events Center) March 20 – Saturday (Day 1 ) 6:00 a.m. Hataw sa Panaad w/ Ching's Group (Football ...  
www.friendshipandsmiles.info/tag/hot-bodies/ - Cached

**0974253308 - Wikireadia.org free book**

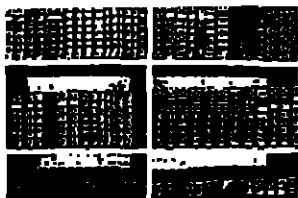
**search by isbn title author ...**

Oct 11, 2009 ... Title: Gnomon Author: Ann Marie Yeager Publisher: Ay Press ... Title: Need I Say 'More' Author: Ann Marie Yeager Publisher: Ay Press ...  
wikireadia.org/search-books-by-isbn/6/31/89.html - Cached

**[PDF] Dr. Adri Kok**

File Format: PDF/Adobe Acrobat - Quick View  
He has been advised to issue statements to the lay press with due caution and to personally review elf manuscripts containing his quotations. ...  
www.physician.co.za/images/SEMDSAreHuisgenootarticle2005.pdf

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Search

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- Title
- Author
- Publisher

Search

Amazon

Search Books



- File name SUBJECT GUIDE  
Book title TO B...  
Unknown (Har...  
**\$67.00**
- File name How to Cho...  
Book title Nat G. Bodian ..  
**\$8.30**  
★★★★★
- File name Title, frequency,  
Book title ...  
Unavailable (D...  
**\$9.95**
- File name Title, frequency,  
Book title ...  
(Digital - Sep ...  
**\$5.95**

Search Results for: 0974258210

ISBN: 0974258210  
 Title: Gnomon  
 Author: Ann Marie Yeager  
 Author2: .  
 Author3:  
 Publisher: Ay Press  
 PublicationDate: 2003-07-00

Amazon

Pricing

Used Book Offers

New Book Offers

Information

ListPrice: 25.00  
 LowestNewPrice: 25.00  
 LowestUsedPrice: 0.01  
 TotalNew: 1  
 TotalUsed: 15  
 SalesRank: 9624301

Amazon Editorial

Reviews

Show Amazon Customer Reviews

Product Description

272 pp; Hardbound in prairie wheat cloth (a nod to the tradition of printers past).

Sonnets & haikus—on all things that comprise society (see Author Comments, below, for explanation concerning haikus).

If you love the wit of Shakespeare, or the quite reflection of the East, you'll want a copy of this book.

First Edition: 1,000 copies; each numbered (for added value.)

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[Express.com](http://Express.com)

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[Audible.com](http://Audible.com)

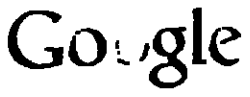
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STAN'S ORIGINAL SUMMARY OF TRANSLATION

Web Images Videos Maps News Shopping Gmail more -

Sign in



aypress Search !

Page 14 of about 4,700 results (0.14 seconds) Advanced search

- Everything
- Images
- Videos
- News
- Shopping
- Books
- More

Alliance, OH  
Change location

Show search tools

- Something different
- pine
- poplar
- cedar
- cottonwood
- sycamore

www.Aerialyoga.com

Expires: -. Cache-Control: no-store, no-cache, must-revalidate, post-check=0, pre-check=0. Pragma: no-cache. X-Pingback: http://www./aypress/xmlrpc.php ... bizinformation.co/www.aerialyoga.com - Cached

Amazon.com: Need I Say

'More' (9780974258232): Ann Marie Yeager: Books

... southeast of Canton, in the providence of Harlem Springs. Yeager is the publisher of **Aypress**. This is her second work, a follow-up volume to Gnomon. ... www.amazon.com/Need-Say-More-Marie-Yeager/.../0974258237 - Cached



Waypress.it - Website Stats | SiteLogiq

aypress.it waypress.iot wayperess.it waypress.ift waypress.8t 2waypress.it ... w aypress.it waypress.it waylress.it wayprexss.it waypress.kt waypr4ss.it ... sitelogiq.com/waypress.it - Cached

Thread PLDT Landline Plus Prepaid using

ZTE mf600 | TipidPC.com ...

- [ Translate this page ]  
2 posts - 1 author - Last post: Mar 22, 2010  
Kaya ang iba ay nakaka-encounter ng no voice sa telephone dahil ang volume ay decreased. para ma-increase ang volume ay press #(while the ... boardreader.com/.../PLDT\_Landline\_Plus\_Prepaid\_using\_ZTE\_mf6\_3kq6xX4lpt.html - Cached

Request Thread for Hack

- [ Translate this page ]  
10 posts - 3 authors - Last post: Nov 12, 2010  
sir nasubukan muna ba eung hbang nsa story room ke0 ng npc ay press niu eung f5 tpos give up niu?? mgsusuccess eun kh8 isang syaw niu In ... www.chaosgamerz.net/audition-hacks.../8-request-thread-hack-8.html - Cached

5 - Gay Press Illustrations by John Crossen

Pride Piper. Gay in the Manger. Evolution. more gay press. The CROSSEN CARTOON COMPANY gallery directory. Misc Graphics 1 | 2 | 3 | 4 TellTrinity ... www.johncrossen.com/gaypress5 htm - Cached

Brassica oleracea. | Henriette's Herbal  
Homepage

In 1806, McMahon recommends for American gardens the green and the brown Aypres and mentions the Red and Thick-leaved Curled, the Siberian, the Scotch and ... www.henriettesherbal.com/eclectic/.../brassica-oler.html - Cached - Similar

