



Thor Thordarson  
NORSKK CORP.  
16192 Coastal Highway  
Lewes, DE  
19958, US

Registrant Email: [krvj9x6bzq7y@privacy-protection.email](mailto:krvj9x6bzq7y@privacy-protection.email)

April 3, 2019

**Re: Your domain name registration – klarnabank.us**

Dear Thor Thordarson

SILKA Law AB (“SILKA”) is addressing you as a representative of Klarna Bank AB (hereinafter referred to as Klarna), with its registered address in Stockholm, Sweden.

Klarna was founded in 2005 in Stockholm, Sweden with the aim of making it easier for people to shop online. In the last 12 years, technology has evolved, excited and transformed the world around us, yet our mission remains as relevant as ever, to make paying as simple, safe and above all, smooth as possible.

Klarna is now one of Europe’s largest banks and is providing payment solutions for 60 million consumers across 100,000 merchants in 14 countries. Klarna offers direct payments, pay after delivery options and instalment plans in a smooth one-click purchase experience that lets consumers pay when and how they prefer to.

It has come to the attention of Klarna that you are the owner of the domain name **klarnabank.us** (hereinafter referred to as the Domain Name). As you may know, **KLARNA®** is a registered trademark of Klarna and is therefore an important asset of Klarna. Accordingly, Klarna must protect its intellectual property rights and in preventing the unauthorized use of its trademarks in order to prevent dilution of their trademark. Please be informed that Klarna is the owner of the US trademark registration KLARNA with registration number 4582346 registered as early as in 2014. This trademark registration predates your Domain Name registrations.

The effect of your use of the mark as part of your Domain Name coupled with the term “bank” strongly suggests that you are connected to Klarna. Our client would also like to point out that by registering the Domain Name you are subject to the domain name dispute policy for .US domain names. This is stated in your Registrar’s Terms & Conditions. The registration of the Domain Name is clearly in breach of this Policy.



Considering, (i) the absence of any authorization from Klarna for you to use their trademark in the Domain Name ii) the non-existence of any other kind of relationship between you and Klarna, and (iii) the fact that you are using Domain Name nearly identical with one of Klarna's official domain name (klarna.com) can be considered as a breach of the registration agreement.

Our client would prefer to solve this in an amicable fashion and therefore kindly asks you to transfer the Domain Name to them and in the future refrain from using any trademarks owned by Klarna without authorization. Accordingly, we hereby kindly ask that:

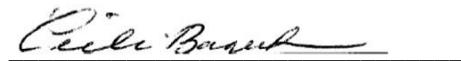
- (1) You immediately and permanently cease the use of the Domain Name*
- (2) You agree not to re-register the Domain Names or any other domain names containing trademarks belonging to Klarna; and*
- (3) You agree to transfer the Domain Name to Klarna with immediate effect.*

Please contact SILKA with a response within seven (7) days of receipt of this letter, at this email address or via postal mail at the address stated below.

The foregoing is without prejudice to the rights or remedies of Klarna, all of which are expressly reserved.

I look forward to your reply.

Sincerely yours,



Cecilia Borgenstam

*IP Counsel*

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