TLR	)	Case No. D2007-0148
	)	
	)	
v.	)	
	)	ENGINEER.INFO
United Engineering Service LLC	)	ENGINEER.BIZ
	)	

RESPONSE

In accordance with the Response deadline extended to March 9, 2007, upon the mutual consent of the parties in the above-identified matter, Respondent hereby submits as follows:

Respondent's authorized representative in this proceeding is John Berryhill, Ph.d. esq. Communications are to be sent via email to:

> john@johnberryhill.com
> and jberryhill@gmail.com

to prevent loss by spam-filtering systems.

Hard copy material is to be sent via fax to:

> John Berryhill, Ph.d. esq.
> 4 West Front Street
> Media, PA 19063
> (610) 565-5601 voice
> (267) 386-8115 fax

I. Introduction

This Proceeding is utterly unwarranted on the facts and should be found to be an abuse of the Policy under UDRP Rule 15(e). The central, and extraordinary, claim here is that an entity calling itself "TLR, a sole proprietorship" owns a common law right in the word "ENGINEER"

in connection with the descriptive use of that word for engineering career resources[1]. Indeed, there is no way to describe the Complainant's services without use of the word "engineer". In support of this contention, the Complainant makes factual claims which are readily shown to be flatly untrue, and which Complainant's counsel would have found to be untrue on casual inquiry, let alone due inquiry.

The Respondent is a limited liability company which has operated for years using the word "Engineering" in its name. Its principal, Mr. Jeffrey Krus, is in fact a registered Professional Engineer in the State of Michigan. As noted in the Complaint, Mr. Krus has been the subject of baseless threats, and now lies, from the Complainant for some time, including the Complainant's narcisistic and untrue allegation that the Respondent's recent move, which necessitated an address change, was prompted by a cease and desist letter.

II. Identity or Confusing Similarity

The first criterion required to be proven by the Complainant is that the domain name is identical or confusingly similar to a trade or service mark in which the Complainant has rights. The Complainant here claims its mark to be "Engineer.net".

It is longstanding and settled precedent, both under the Policy and the relevant US law applying to the parties here, that the top-level domain portion of a domain name is not relevant to the determination of distinctiveness of a trade or service mark. Because TLDs generally serve no source-indicating function, their addition to an otherwise non-distinctive term cannot render it distinctive. Oppedahl, 373 F.3d at 1174, 71 USPQ2d at 1372 (PATENTS.COM merely descriptive of computer software for managing a database of records and for tracking the status of the records by means of the Internet); In re Microsoft Corp., 68 USPQ2d 1195, 1203 (TTAB 2003) ("The combination of the specific term and TLD at issue, i.e., OFFICE and .NET, does not create any double entendre, incongruity, or any other basis upon which we can find the composite any more registrable than its separate elements. The combination immediately informs prospective purchasers that the software includes 'office suite' type software and is from a Internet business, i.e., a '.net' type business."); In re CyberFinancial.Net, Inc., 65 USPQ2d 1789, 1792 (TTAB 2002) ("Applicant seeks to register the generic term 'bonds,' which has no source-identifying significance in connection with applicant's services, in combination with the top level domain indicator ".com," which also has no source-identifying significance. And combining the two terms does not create a term capable of identifying and distinguishing

---

[1] The Complainant provides no evidence of the formal existence of an entity known as "TLR", such as a registration of a fictitious business name, to avoid the uncomfortable admission that it has registered a domain name to an entity that has no legal status whatsoever, in violation of the terms of registration for its own domain name. In the reverse situation under the Policy, Panels make much of the provision of "false whois information". The Complainant has not provided a shred of evidence that it conducts business as "TLR" other than its use of that false and unregistered name to register a domain name. The Complainant "TLR" has thus not demonstrated standing as an entity capable of owning trade or service mark rights, or indeed as an entity capable of contracting to register a domain name.

applicant's services."). In these respective cases, the domain names "patents.com", "office.net", and "bonds.com", were not being used to supply patents, offices, or bonds, but were alleged to have been used distinctively in connection with services of which those terms are descriptive. Here, the Complainant argues that because it provides employment services to engineers, and not engineers *per se*, that its use is "suggestive". The Complainant does not attempt to describe what mental act of inference is required to bridge the gap between the descriptive term as applied to the services it admits to providing. One would not expect to summon the physical presence of an engineer by typing a domain name, but one certainly would expect the services there to be related in a descriptive way to the word "engineer" - and indeed the Complainant's services are directly descriptively related to the word "engineer".

A mark is considered merely descriptive if it describes an ingredient, quality, characteristic, function, feature, purpose or use of the specified goods or services. See *In re Bed & Breakfast Registry*, 791 F.2d 157, 229 USPQ 818 (Fed. Cir. 1986) (BED & BREAKFAST REGISTRY held merely descriptive of lodging reservations services).

It is not necessary that a term describe all of the purposes, functions, characteristics or features of a product to be considered merely descriptive; it is enough if the term describes one significant function, attribute or property. In re Oppedahl & Larson LLP, 373 F.3d 1171, 1173, 71 USPQ2d1370, 1371 (Fed. Cir. 2004) ("A mark may be merely descriptive even if it does not describe the 'full scope and extent' of the applicant's goods or services," citing In re Dial-A-Mattress Operating Corp., 240 F.3d 1341, 1346, 57 USPQ2d 1807, 1812 (Fed. Cir. 2001)); In re Gyulay, 820 F.2d at 1218, 3 USPQ2d at 1010.

Here, the Complainant claims that the name of a profession - "engineer" - is suggestive, but somehow not descriptive, of a service of direct descriptive relevance; the provision of employment listings for engineers. That species of claim was directly rejected in *In re Mortgage Bankers Association of America*, 226 USPQ 954 (TTAB 1985), in which the proposed mark "CERTIFIED MORTGAGE BANKER" for "educational services, namely providing qualifying examinations, testing and grading in the field of real estate finance" was held so highly descriptive as to be incapable of functioning as a mark notwithstanding evidence of acquired distinctiveness. The claim at issue here does not even involve some sort of qualifier such as "certified", but is the direct common name of the profession at issue.

The Complainant claim to have acquired distinctiveness in the term "ENGINEER" is based on objectively false and untrue allegations, at page 4, concerning how it claims to have "used the domain name". The Panel will observe that the Complainant claims to have "used the domain name" for different purposes at different times. The Complainant does not show or demonstrate how it used "ENGINEER.NET" as a trade or service mark applied to any goods or services during this period. The mere use of a domain name as an internet address does not confer a trade or service mark. A trade or service mark must be presented in a manner that will be perceived by potential purchasers to indicate source and not as merely an informational indication of the domain name address used to access a web site. In re Eilberg, 49 USPQ2d 1955 (TTAB 1998).

If, however, it is the Complainant's contention, dubious as it may be, that "ENGINEER.NET" is a compound mark in which the addition of ".NET" to the generic term "engineer" is the distinguishing portion, then it is readily observed that such distinguishing feature is absent from the domains here at issue. As noted in *Snowboards-for-sale.com, Inc. v. Name Administration Inc.*, WIPO Case No. D2002-1167, wherein the complainant attempted to draw a distinction between the descriptive phrase "snowboards for sale" and the alleged mark "snowboardsforsale.com":

> The ".COM" element, so far from serving to distinguish Complainant from other sellers of snowboards, merely conveys a domain address. . It is only where a domain name has been shown by appropriate evidence to have acquired distinctiveness as a trademark that it may be protected under the Policy: see, for example National Association of Professional Baseball Leagues, Inc., d/b/a Minor League Baseball v. John Zuccarini WIPO Case No. D2002-1011.

In order to claim acquired distinctiveness, the Complainant claims to have used the mark "until 2001" for a search database, and then "from 2001 to the present" in connection with an employment resource for engineers. Attached hereto as Exhibit A is a print-out of records from the Internet Archive[2] which show that up to 2000, the only thing the Complainant had done with the domain name was to provide a "mirror" - a front-end to a database hosted elsewhere - of the California Department of Transportation, "Caltrans", index of construction projects. The Respondent does not and did not own, operate or configure that database, for which the Complainant merely copied Caltrans search submission page onto its website. **More importantly, however, the ONLY content at the Complainant's website for a full year spanning between 2000 and 2001 was a "domain for sale" page. For the remainder of 2001, the only content at Complainant's web site was a "Coming Soon" page.** In fact, as of May 2002, it appears the Complainant was still attempting to configure a web page at engineer.net.

The Panel is urged to independently consult the Internet Archive at www.archive.org, and to compare the facts with the allegations sworn by Complainant and certified over its attorney's signature. As will be discussed below, the Complainant's fabricated history of its "use of the domain name" at page 4 of the Complaint is not the only false allegation made in this Proceeding, and the Panel is respectfully requested to consider the Complainant's credibility with the facts that the Panel may itself confirm. At the very least, the Panel may consider the motivation for the Complainant's omission of its own history as a domain warehouser or speculator with respect to engineer.net. The Complaint alleges various historical "facts", but intentionally has omitted to provide evidence supporting these allegations. The reason for this intentional withholding of evidence from the Panel is that the facts contradict the Complainant's allegations.

The specific use of the name of an occupation as a domain name, in connection with employment listings pertaining to that occupation, has been determined in at least one prior

---

[2]The date of material recovered from the Archive can be discerned from the notation in the upper right of the page, in which the URL provides a date-stamp thereof.

Policy decision to be merely a descriptive use. In *Fluke Corporation v. Name Administration Inc. (BVI),* NAF Case No. FA0502000430650, <http://domains.adrforum.com/domains/decisions/430650.htm>, the complaint was premised upon the mark "METERMAN" for electrical test equipment, and the respondent held the domain name meterman.com. The Panel found:

> "At the disputed domain name website, <meterman.com>, the Respondent offers links to utility company and government jobs for metermen inter alia.
> [...]
> At Complaint Annex 10, the Complainant attempts to show that an Internet dictionary search shows there is no such word as "meterman". However, by citing a series of employment listings and similar material, the Respondent shows convincingly that "meterman" has a generic meaning (Response Exhibit A). The Panel was already well aware of this generic meaning, and the Respondent's proof only reinforces it."

Accordingly, the *Fluke* panel found that the respondent had a legitimate right in the use of a generic occupational name used as a domain name in conjunction with employment listings. Here, the meaning of the word "engineer" is not in dispute, and it would be directly inconsistent for the use of an occupational domain name for employment listings to be found merely descriptive as in "meterman.com", but somehow distinctive as a trade or service mark for "engineer.net", particularly under circumstances where the Complainant's history of its "longstanding use" is in contrast to independently verifiable fact.

Furthermore, the Complainant does not attempt to explain how its use of the term "engineer" within a domain name for the purpose of providing resources relevant to engineers is at all distinctive. The Complainant deliberately mis-states 15 USC 1052(f) stating, "use in commerce of a mark for a period of five years gives rise to a presumption that the mark has attained secondary meaning". (Complaint page 5)   The actual statute in question qualifies that five year period by requiring "proof of **substantially exclusive and continuous use**". As noted, the Complainant spent a year during 2000-2001 doing nothing other than trying to sell the domain name. Hence, concerning **continuous** use, the Complainant here appears to be arguing that it acquired distinctiveness five years after it began use of the domain name for job listings in early 2002. **Therefore, the Complainant's claim is that it obtained distinctiveness some weeks ago, in early 2007.** It is clear that the domain names engineer.info and engineer.biz were both, as the Complaianant admits, registered well prior to the claimed date on which the Complainant obtained distinctiveness in "engineer.net" for the purpose of providing job listings.

The Complainant does not identify any publications or advertisements in which it has held out is "search engine service" or job posting services. The Complainant provides no records of advertisement expenses associated with the domain name, or any indication of public recognition that "engineer.net" is anything other than an internet domain name that has content of interest to engineers.

Aside from the Respondent's own use of the word "engineer" in domain names during the period in which the Complainant admits to have not yet acquired distinctiveness, attached hereto as Exhibit B is a result from a domain search engine for domain names containing the word "engineer". The search engine used will return no more than 500 results for a given query, and the word "engineer" within a domain name readily reaches the maximum. Also included in Exhibit B are print-outs from such websites as:

> Engineer.com
> Engineering.net
> Engineering.com
> Engineers.net
> Engineerjobs.com
> Engineer.us

- all of which utilize a domain name containing the word "engineer", and all of which provide employment listings. There is nothing exclusive or distinctive about Complainant's use of the word "engineer" within a domain name used for engineer employment listings.[3] The Respondent has not inspected each of the hundreds, if not thousands, of "engineer" domain names to determine the preponderance of employment listings at such websites, and believes that presentation of such voluminous evidence would be makeweight. If the Panel believes that more evidence on this point would be of assistance, it will be promptly provided in response to a request under UDRP Rule 12.

While the Policy permits common law claims, the term at issue here is a common word being used in connection with its ordinary meaning to describe subject matter of which the word is directly descriptive. The term "engineer" within domain names is widely used to provide information of interest to engineers, including employment listings, and is thus not distinctive of the Complainant's claimed services. Moreover, the Complainant has made false allegations concerning its history of using the domain name, and at best has exhibited a deliberate lack of candor. For the foregoing reasons, the Respondent submits that the Complainant has not demonstrated a trade or service mark right, and thus has not sastisfied the first criterion of the Policy.

III. Legitimate Rights or Interests

---

[3] The Complainant's claim to have established exclusive use of the domain name "engineer.net" is probative of nothing and would render every registrant of every generic or descriptive domain name to be a trademark owner, as the use of any domain name is inherently "exclusive" by definition. For example, "engineer.com", registered to another party entirely, was also created in the 1990's and is used to supply job listings. Therefore, is it the Complainant's position that "engineer.net" and "engineer.com" are separate trademarks, but that the disputed names here, also exclusively by a single used for years, are not themselves trademarks owned by the Respondent?

The second criterion required to be proven by the Complainant under the policy is that the Respondent has no legitimate rights or interests in the domain name. Such rights and interests are not limited to trade or service mark rights, but include any equitable or legal interests such as use of the domain name for a bona fide purpose.

The Respondent, United Engineering Service LLC is owned and managed by Mr. Jeffrey Krus, a professional engineer registered with the State of Michigan. (Exhibit E - Declaration of Jeffrey Krus) It is first to be observed that the word "engineer" is both the name of Mr. Krus' profession and is used in the name of his company. Registration of the name of a profession, or portion thereof, by a professional engaged in the field designated thereby, was addressed in *Prisma Presse v. Bill Connelly*, WIPO Case No. DBIZ2002-00175, <http://www.wipo.int/amc/en/domains/decisions/html/2002/dbiz2002-00175.html>. Considering the claim advanced against "geo.biz" by a French magazine named GEO, against a professional geologist, the panel observed:

> "In the Panel's view, the fact that the Respondent is a professional geologist, who has been employed as a geologist for over 30 years, and who owns a petroleum geology consulting company, establishes that the Respondent does have rights or legitimate interests in using the word "geo" sufficient to prevent the Panel drawing any inference solely from the Respondent's use of the disputed domain name without the Complainant's authority. Although the Respondent does not have any trade mark or service mark rights in the word "geo", this word is a common prefix (from the Greek word for "earth") in which the Respondent can and does have rights by virtue of his profession as a geologist and by virtue of the fact that he operates a business concerned with geology."

The Respondent here, an engineering firm, is perfectly entitled to register the domain names engineer.info and engineer.biz and use those domain names for any purpose at all, as there is no trade or service mark right in the word "engineer".

The Respondent uses the domain engineer.biz primarily for email purposes, and has that domain configured to forward http queries (web site queries) to engineer.info. Because the Respondent utilizes engineer.biz as its primary professional address for email communications, including communications concerning ongoing business, transfer of the domain name to the Complainant would result in the Complainant being able to obtain confidential and proprietary communications sent to the Respondent via engineer.biz. The Respondent cannot afford to risk that result and is filing in parallel with this response an action seeking injunctive relief against the Complainant.

The Complainant has made a number of interesting, and false, allegations concerning the Respondent's use of the domain names, the bulk of which are most properly addressed under the heading of "bad faith" below. However, the Complainant's allegation that the Respondent has been "scraping" employment listings from elsewhere, or that the Respondent has copied anything of the Complainant's, deserves discussion here.

The Respondent uses the domain name engineer.info under a publishing agreement with Indeed.com, a publisher of employment listings. As shown in Exhibit C, Indeed.com is a publisher of employment listings. Indeed.com offers an affiliate program under the publisher agreement shown in Exhibit C, under which a website operator desiring to provide employment listings may affiliate with Indeed.com in order to display employment listings on the affiliate's website in return for referral payments. Attached as Exhibit D is a copy of the print-out for the search "aeronautical engineer" at Indeed.com, and a copy of the print-out for the same search at engineer.info. The Panel will observe that these employment listings are identical, as the Respondent's job listings are received directly from Indeed.com.

The Complainant makes a number of lurid and false accusations that the Respondent is engaged in illicit means to obtain and publish job listings at engineer.info. What the Complainant leaves out of its accusations is the fact that many job listing sites - including the Complainant's engineer.net - intentionally publish what is known as an RSS Feed[4] (Really Simple Syndication) for the express purpose of providing job listings to consolidators such as Indeed.com so that their job listings will enjoy wide circulation. Attached hereto as Exhibit F is a print-out of the Complainant's home page at engineer.net. The Panel will observe a link along the left of the page labelled "JOB FEED" and displaying an orange RSS icon. Also included in Exhibit F is a copy of the Complainant's RSS Feed output, which the Complainant entitles "Engineering Jobs News Feed". The Complainant's use of the RSS mechanism to distribute its job listings to search engines is what **causes** other job search systems to publish the Complainant's job listings. For example, further included in Exhibit F is a copy of a job listing search at About.com, which clearly indicates that its results are drawn from the Complainant's site. To put it simply, the Complainant's entire false allegation that the Respondent is "scraping" the Complainant's job listings is premised upon the Complainant's own publication of its job listings to internet job search engines via an RSS feed.

The Respondent expressly denies having copied anything from the Complainant's website. In point of fact, the Complainant neglects to mention that its own website is built from a commercial website template available to any party for $59.99 from Vivid Office as shown in Exhibit G. As can plainly be seen, this is the commercially-available template the Complainant uses for its web site, and which does not resemble the Respondent's website. In fact, as further shown in Exhibit G, the Complainant makes the commercial template available at http://www.engineer.net/Templates/earthtech.dwt and has included its own, and false, copyright notice at the footer of the page. While the template was clearly purchased from Vivid Office, and was authored by John Galt, the Complainant has placed its own copyright notice on the raw webpage template file. The Complainant's accusations of copyright infringement here are outstandingly hypocritical, to say the least.

---

[4] RSS feeds are the mechanisms by which blogs, news sites, and others distribute their content in a standardized format for summary and publication on other web sites. For example, an RSS button is shown at the ICANN home page at www.icann.org for dissemination of ICANN announcements to other web sites and reader software.

The Respondent has long used the domain name engineer.biz as its professional email address domain and point of contact for ongoing work. Attached hereto as Exhibit H are copies of older and more recent emails from which confidential information has been redacted, and which show that the Respondent has been conducting his business using engineer.biz. Again, the Respondent is a professional engineer and is entitled to use the domain name "engineer.biz" as its primary point of contact for exchanging professional communications. The Complainant is attempting to use its false claims to obtain the Respondent's professional correspondence. The Respondent cannot permit its confidential communications to be sent to the Complainant under any circumstances.

The Respondent submits that it has legitimately been using and shall continue to use engineer.info in connection with its Publisher Agreement with Indeed.com. The Respondent submits that it has legitimately been using and shall continue to use engineer.biz as its primary point of contact for electronic communications. These uses of the domain names are perfectly legitimate. Search systems such as Google, About, and Indeed provide express mechanisms for reporting copyright violations or preventing indexing of sites, of which the Complainant may avail itself to prevent the distribution of its job listings which it has encouraged. However, "engineer" remains a merely descriptive term in association with job listings for engineer, and no party may assert an exclusive claim to the word "engineer".

IV. Bad Faith

The final criterion required to be proven by the Complainant is that the domain names were registered in bad faith, and that they were subsequently used in bad faith. This is an element of specific intent, as the Policy is directed toward the abusive registration of domain names known to be trade or service marks of others. Again, while the Complainant has made a number of claims of copyright violation, cyberflight, and contractual violations - all of which are categorically denied by the Respondent, and all of which are false - the Policy is not intended as a court of general jurisdiction over any legal claim which may be made on the basis of activity conducted via the Internet. The Policy is directed to the abusive registration of domain names. What we have in this proceeding is the principal of an engineering firm which registered two domain names consisting of the word "engineer", which is not a trade or service mark of any party in connection with subject matter relating to engineers or engineering.

Perhaps the most scurrilous allegation made by the Complainant is that the Respondent has engaged in "cyberflight". As documented in the Complaint, the Complainant has periodically harassed the Respondent over its registration and use of the domain names in dispute here. The Respondent is entitled to move, and the Respondent did in fact change its address in early 2007. In fact, as the Complainant well knows, as the Complainant is fully aware that the Respondent is a registered LLC, the Respondent did indeed file a change of address with the Michigan Secretary of State in early 2007, a copy of which is attached hereto as Exhibit I. The simple fact is that the Respondent's principal had originally obtained and registered the domain names under his personal name. As the Respondent was filing the change of address with the Michigan Secretary of State, the Respondent also updated the WHOIS information to

reflect that the domain names were obtained for use by United Engineering Service LLC. The Complainant is fully capable of obtaining corporate filings from the Michigan Secretary of State confirming that the Respondent moved its actual address from Washington, Michigan to Bloomfield Hills Michigan. **Nonetheless, the Complainant has chosen to deliberately lie to this Panel, in a certified Complaint, that the Respondent has engaged in "cyberflight". The Respondent is required to keeps its address current in the WHOIS data. The Respondent moved, and so the Respondent updated its address information.** The Complainant has demonstrated that it has long been perfectly able to reach and harass the Respondent. The notion that the Respondent changed the WHOIS data to hide from the Complainant or to conceal its identity is utter nonsense, and the Complainant knows it to be nonsense. The Panel should not reward this deliberate deception by the Complainant.

The Respondent does not compete with the Complainant in the solicitation of advertisements from employers seeking to hire engineers. **In fact, the Complainant fully knows that the Complainant's own publication of its job database to Indeed.com works to the advantage of the Complainant.** The Respondent does not solicit or post its own job advertisements. Years ago the Respondent once posted an advertisement via engineer.net when the Respondent was seeking to hire an employee. The Respondent received no leads from that advertisement, and discontinued it. This brief use of a classified advertising system does not act as a bar to the registration of any domain name, or the conduct of any business, by the Respondent.

The Complaint refers to a "last wave of infringement" as being "sophisticated". The only "sophisticated" part of these allegations is the argument itself.   The Panel will note that the Complainant claims that the Respondent has copied "scripts" of the Complainant. Both of the parties' websites include content that is generated by computer programs. Typically, such active content is accessed by a URL of the form http:<domain name>/<directory path>/<script name>?<input parameters>. The Panel will note that the Respondent's script names end in ".asp", while the Complainant's script names end in ".php". These script names demonstrate that the parties' use two entirely different, and incompatible, types of computer programs to generate search results. The Respondent uses ASP, which is defined as:

> "Active Server Pages (ASP) is Microsoft's Server-side script engine for dynamically-generated web pages. It is marketed as an add-on to Internet Information Services (IIS). Programming ASP websites are made easier by various built-in objects."
> Wikipedia: http://en.wikipedia.org/wiki/Active_Server_Pages

The Complainant uses PHP:

> "PHP (PHP: Hypertext Preprocessor) is a reflective programming language originally designed for producing dynamic Web pages. PHP is used mainly in server-side scripting, but can be used from a command line interface or in standalone graphical applications. Textual User Interfaces can also be created

using ncurses.

> The sole implementation is produced by The PHP Group and released under the PHP License. It is considered to be free software by the Free Software Foundation."
> http://en.wikipedia.org/wiki/Php

Again, the allegation that the Respondent "copied" scripts belonging to the Compliant is utter nonsense, as the parties employ entirely different and incompatible programming languages to generate active content. The further allegation that both parties use the words "engineering jobs" in a directory path name for search systems relating to engineering jobs hardly merits a response. The use of these descriptive terms in a directory path name cannot be "confusing" to users, since a user would have to be on one, and only one, of the respective web sites in order to navigate to the designated directory path. More importantly, however, is the primary principle that the Policy is directed toward the abusive registration of **domain names**. The proposition that the Complainant claims to own a proprietary interest in the phrase "engineering jobs" within a directory structure is interesting, but it is just as irrelevant to this proceeding as it is meritless.

For the foregoing reasons, the Respondent submits that the Complainant has not demonstrated that the domain names were registered in bad faith or used in bad faith. Furthermore, the Respondent submits the Complainant has made allegations in support of these criteria which the Complainant knows or should know are false.

VI. Conclusion

The Complainant has failed to prove any of the criteria required by the Policy, and the Complaint should be **DENIED**. The Panel is further requested to consider the propriety of the Complainant's deliberate falsehoods concerning the use of its own engineer.net domain name, and the deliberate falsehoods the Complainant has advanced concerning the activities of the Respondent.

V. Other Legal Proceedings

Respondent is preparing and filing an action against the Complainant for fraud (on the basis of the false allegations here), interference with contract, and for declaratory and injunctive relief in an appropriate forum. The Panel will be provided a copy of the civil action against the Complainant in due course.

VI. Communications

A copy of this Response has been sent or transmitted to the Complainant on an even date herewith in accordance with Complainant's contact details.

VIII. Certification

The Respondent agrees that, except in respect of deliberate wrongdoing, an Administrative Panel, the World Intellectual Property Organization and the Center shall not be liable for any act or omission in connection with the administrative proceeding.

The Respondent certifies that the information contained in this Response is to the best of the Respondent's knowledge complete and accurate, that this Response is not being presented for any improper purpose, such as to harass, and that the assertions in this Response are warranted under the Rules and under applicable law, as it now exists or as it may be extended by a good-faith and reasonable argument.

Respectfully submitted,

John Berryhill, Ph.d. esq.

March 9, 2007

LIST OF EXHIBITS

EXHIBIT A - Archive Records Demonstrating Complainant's False Statements
EXHIBIT B - Third Party Domain Names and Web Sites Using "Engineer"
EXHIBIT C - Indeed.com Job Search Engine and Publisher Agreement
EXHIBIT D - Comparison of Indeed.com Listings and Engineer.Info Listings
EXHIBIT E - Declaration of Jeffrey Kruse
EXHIBIT F - Complainant's RSS Feed
EXHIBIT G - Third Party Template Falsely Claimed by Complainant To Be Original
EXHIBIT H - Examples of Older and Recent Business Conducted with Engineer.biz
EXHIBIT I - Address Change Record of United Engineering Service LLC

EXHIBIT A

INTERNET ARCHIVE
WayBackMachine

Enter Web Address: http://   All ▼   Take Me Back   Adv. Search   Compare Archive Pages

Searched for **http://www.engineer.net**   **302** Results

Note some duplicates are not shown. <u>See all.</u>
* denotes when site was updated.

Search Results for Jan 01, 1996 - Feb 16, 2007

1996	1997	1998	1999	2000	2001	2002	2003	2004
0 pages	0 pages	3 pages	2 pages	5 pages	5 pages	11 pages	12 pages	0 pages

1998	1999	2000	2001	2002	2003	2004
Jul 08, 1998 *	Jan 25, 1999 *	Mar 04, 2000	Feb 23, 2001 *	May 26, 2002 *	Feb 06, 2003 *	Fe
Nov 11, 1998 *	Feb 08, 1999	Jun 17, 2000	Mar 09, 2001	May 28, 2002	Feb 07, 2003	Fe
Dec 12, 1998		Oct 01, 2000 *	Mar 31, 2001	Jul 21, 2002	Feb 19, 2003 *	Fe
		Oct 17, 2000	Sep 25, 2001 *	Aug 05, 2002	Apr 01, 2003 *	Fe
		Oct 24, 2000	Dec 02, 2001	Sep 21, 2002	Apr 07, 2003	Fe
				Sep 24, 2002	Apr 13, 2003	Fe
				Oct 06, 2002	Apr 20, 2003 *	Fe
				Oct 17, 2002	Apr 24, 2003	Fe
				Nov 22, 2002 *	May 27, 2003	Fe
				Nov 25, 2002	Jun 01, 2003	Fe
				Dec 21, 2002 *	Jun 04, 2003	Fe
					Jun 10, 2003 *	Ma

Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ma
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap
Ap

"agents of change"®
Engineer.net
search agent and mirror services

Free access search engines, by engineer.net:

[+ Caltrans Search Engine +](#)

info@engineer.net
engineer.net provides free and private search engine services
for the
Construction and Engineering industry

27 July, 1998

This public service mirror is currently sponsored by:

Caltrans Internet Search Engine Mirror Site

Key words for search: [   ] Search

Find pages with [all ▼] of these words and return [10 ▼] results at a time.

Additional Options:

☑ Detailed Results ☐ Search Phonetically ☐ Begins With Searching

What's New: ○ Past Day ○ Past Week ○ Past Month ○ Last Update

Search for key words found only in: ☐ URLs ☐ Titles ☐ Headers

Engineer.net bookstore, featured books in association with Amazon.com

Theory and Design of Bridges Theory and Design of Bridges, by Petros P. Xanthakos

Seismic Design and Retrofit of Bridges Seismic Design and Retrofit of Bridges, by M. J. N. Priestley, Frieder Seible, Glan Michele Calvi

| **No Photo** | Bridge and Structure Estimating, by J. David Nardon

"agents of change"®
Engineer.net
search agent and mirror services

+ Services +

info@engineer.net
engineer.net provides private value added data services
for the
Construction and Engineering industry

20 January, 1999

This public service mirror is currently sponsored by:

Caltrans Internet Search Engine Mirror Site

Key words for search: [＿＿＿＿＿＿＿＿＿＿] [Search]

Find pages with [all ▼] of these words and return [10 ▼] results at a time.

Additional Options:

☑ Detailed Results ☐ Search Phonetically ☐ Begins With Searching

What's New: ○ Past Day ○ Past Week ○ Past Month ○ Last Update

Search for key words found only in: ☐ URLs ☐ Titles ☐ Headers

Engineer.net bookstore, featured books in association with Amazon.com

[Theory and Design of Bridges] Theory and Design of Bridges, by Petros P. Xanthakos

[Seismic Design and Retrofit of Bridges] Seismic Design and Retrofit of Bridges, by M. J. N. Priestley, Frieder Seible, Glan Michele Calvi

| **No Photo** | Bridge and Structure Estimating, by J. David Nardon

Engineer.net

This Domain is for sale.

Serious offers only.

email: domainforsale@engineer.net

Engineer.net

This Domain is for sale.

Serious offers only.

email: domainforsale@engineer.net

Engineer.net

This Domain is for sale.

Serious offers only.

email: domainforsale@engineer.net

Coming Soon !

Engineer.net

Sell what you know

info@engineer.net

Coming Soon !

Engineer.net

Sell what you know

info@engineer.net

Welcome to Engineer.net

the engineer (only) job search engine

Home
Job Searching
Employers
FAQ
Advertise Here
Terms of Use
Privacy Policy

5 items **Name** Size Kind Date

---

default.html 2 K Netscape 6 document Sat, Apr 20, 2002, 8:43 PM

EJ - folder Sun, May 12, 2002, 9:29 PM

macOS.GIF 2 K PictureViewer document Sat, Apr 20, 2002, 8:43 PM

Max - folder Mon, May 20, 2002, 5:50 PM

PNFIconGraphics - folder Sun, May 12, 2002, 9:31 PM

EXHIBIT B

The world's first
search engine.

n@medroppers.com®
domain name searching services
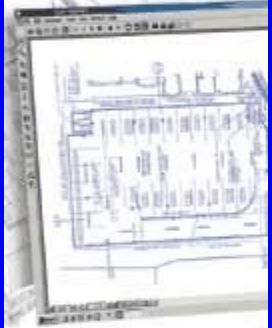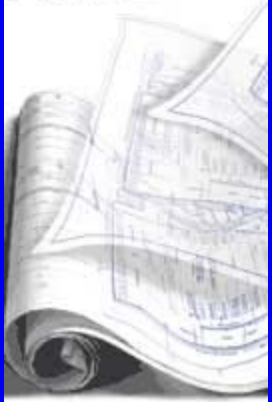
The Web's most innovative utility to SEARCH and REGISTER domain names!

Find and Register your Domain Name using Namedroppers.com and we'll park your Domain Name for free!

Include Keywords: | engineer | **Drop Em!**

Search Parameters:
◉ Any Order ○ Exact Order
☐ Starts with First Keyword
Display: registered & suggested ▼
Suggestion category: General ▼
☑ .com ☑ .net ☑ .org ☑ .edu

Tip: Separate your keywords with spaces for more thorough results (i.e. 'free' 'mp3' versus 'freemp3').

Advanced Search

Purchase Domain:

After reviewing your search results to find an available domain name, enter your desired name in the input box below to purchase it. Click here for pricing.

Enter an available Domain Name to purchase:

[   ] Register It!

Order Your Namedroppers.com® Domain Report Now

Tired of scrolling through pages of results? Are there too many results for your search criteria?   Order your Namedroppers Report now and gain instant access to the entire list of registered domains matching your keywords. Reports start at only $29.99.

Search Results:

Registered Domain Names

Matched over **500** domain names out of 70 million in **0.15** seconds.

```
 1. [WHOIS]  engineer.com
 2. [WHOIS]  engineer.net
 3. [WHOIS]  engineer.org
 4. [WHOIS]  0hourengineer.com
 5. [WHOIS]  1engineer.com
 6. [WHOIS]  1-engineer.com
 7. [WHOIS]  104engineer.com
 8. [WHOIS]  104thdumptruckengineer.com
 9. [WHOIS]  107engineer.org
10. [WHOIS]  108engineer.com
11. [WHOIS]  1212engineer.com
12. [WHOIS]  1212engineer.net
13. [WHOIS]  123engineer.com
14. [WHOIS]  128engineer.com
15. [WHOIS]  130engineer.com
16. [WHOIS]  13thengineer.com
17. [WHOIS]  150engineer.com
18. [WHOIS]  150engineer.net
19. [WHOIS]  150engineer.org
20. [WHOIS]  153engineer.com
21. [WHOIS]  153rdengineer.net
22. [WHOIS]  1800engineer.com
23. [WHOIS]  1networkengineer.com
24. [WHOIS]  1rfengineer.com
25. [WHOIS]  2engineer.com
```

Page: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 >>

engineer.com

Sponsored listings for **engineer jobs**:

General Engineering Jobs
Search Dice.com for General Engineering **jobs** from top companies
www.DiceEngineering.com

Engineer Jobs.
T-Mobile Job Opportunities. Find your technology calling.
www.t-mobile.com/jobs

Vacancies at Shell
Find Engineering Positions Become part of our global team
www.shell.com/careers

Engineer
Find the Best-Paying $100K **Jobs** Join the Club & Get Hired Faster
www.TechnologyLadder.com

Test Engineer jobs
Don't just dream about it! Find your ideal Test Engineering job now
www.justTESTjobs.com

LA Recording School
Learn Music Production in the Heart of Hollywood at LA Recording School
www.LARecordingSchool.com

Engineer Jobs
Land the Right Job on Monster - Search Listings & Get Career Advice
www.Monster.com

Engineer jobs
Find Job Listings & Openings by Location, Industry or Keyword
www.hotjobs.com

Make $1,000 Everyday
Need Part Time Work? Data Entry Processors Needed. Make Money Now!
OnlineDataEntryJobs.com

Engineer Jobs
Search Nationwide **Engineer Jobs**, Resumes of Engineering Candidates
www.iHireEngineering.com

Web Results for **engineer jobs**:

Petroleum Engineer
- A petroleum **engineer** job listing and recruiting site for petroleum engineers and related oil industry **jobs**.
http://www.petroleumengineer.com/

Medical Engineer
- Resources for Medical Engineering including **jobs** boards, discussion forums, and online calculation tools. Features the open definitions discussion project.
http://www.medicalengineer.co.uk/

RELATED SEARCHES

Petrochemical Engineer Jobs
Electrical Engineer Jobs in Dubai
Instrumentation Engineer Resume
Engineer Opportunities
Engineer Opportunity
Engineer Recruiter
Engineer Recruiting
Sales Engineer Career
Computer Science Jobs
Human Resources Jobs
Engineer Average Salary
Engineer Help Wanted
Engineer Part Time
Traffic Engineering
Engineering Work

Euro Engineer
- Engineering **jobs**, recruitment opportunities and resources for the engineering professional.
http://www.euroengineer.net/

Aircraft Engineers Bulletin Board
- Discussion forum for British Aircraft Engineers. **Jobs** vacancies and licensing online.
http://www.airmech.co.uk

Institution of Engineers Pakistan, Karachi Center (IEP)
- Features activities, technical papers and publications, scholarships and **jobs**, and a directory
of Pakistani engineers.
http://www.iepkc.org

Search: [   ]   **Search**

engineering.net (Beta)

Home   **Engineering Jobs**   Engineering Career   Civil Engineering Jobs

Search Location

Enter your city & state, or zip

[   ]   Search

e.g. New York, NY or 10022

You are here: > Web Results

Web Results

Sponsored Results for engineering jobs

Dice **Engineering Jobs**

Search for General **Engineering jobs** at Dice.com. 30k+ open positions. www.DiceEngineering.com

Apply for **Engineering Jobs** Here

Raytheon Company is now hiring for **engineering jobs**. Apply today. www.rayjobs.com

Find **Engineering Jobs**

Post Your Resume & Search Listings Find **Engineering Job** on
Monster. www.Monster.com/engineering

Engineering Jobs

Engineering employment site. Find or post **jobs** nationwide. www.iHireEngineering.com

Find - **Engineering Job**

Thousands of new **Jobs**. Find your new career here. Local and National **Job**
Search. www.JobsOnline.net

Engineering Jobs

T-Mobile **Job** Opportunities. Find your technology calling. t-mobile.com

Engineering Faculty **Jobs** at Universities

Find **engineering**, science postdoc, faculty, research **jobs** at colleges/universities, research
institutes worldwide on AcademicCareers.com. Search/post **job** openings. Free applicant
services. www.academiccareers.com

Engineering Jobs at Net-Temps

Net-Temps is the destination for **job** seekers looking for contract, temporary or direct employment
through a staffing agency. Search by career or location. Submit your resume today for
free. www.net-temps.com

Engineering Jobs

Find **Job** Listings & Openings by Location, Industry or Keyword. www.hotjobs.com

Engineering Job

Check out our many **engineering job** listings for positions in Montana, Arizona and Utah. We offer
great benefits. Apply now. www.m-m.net

Related Searches

Engineering Jobs
Engineering Career
Civil Engineering Jobs
Electrical Engineer Jobs
Engineering Management
Electrical Engineering Jobs
Architect Jobs
Mechanical Engineering
Jobs
Architecture Career
Drafting Career
Engineer Jobs
Chemical Engineering Jobs
Electrical Engineering
Career
Architect Career
Computer Engineering Jobs

Search the Web: [   ]   Search

ENGINEERING.com
βeta   *The Engineer's Ultimate Resource Tool*

Home | News | Education | Software | Careers | Directories | Library | Games & Puzzles

Home

At ENGINEERING.com we help engineers around the world be more productive and informed. Collaborate online with other engineers, find the latest industry news, and move your career ahead. ENGINEERING.com is the engineer's ultimate resource tool.

FEATURE
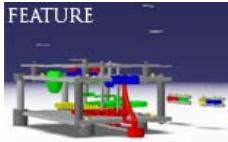
3D Solid-modeled Clock (2/19/2007)
Students developed/created all parts, and tested some of them through COSMOS. They particularly like a mechanical device to which they can relate in daily living, and enjoy seeing the visible gear trains. Good project for part creation, ass... **More >>**

More Features   **Comments (0)**

COLLA

JOIN ENGINEERING.COM | POST YOUR COMPANY IN THE DIRECTORY   REGISTER NOW

Calculators
University Directory
Free Downloads
Communiqué
Library Articles UPDATED
Biographies
Games & Puzzles UPDATED
Job Listings UPDATED
My Engineering
Company Directory
ENGINEERING.com Toolbar

Submit Feedback

CATIA EDUCATION CENTER

WEEKLY POLL
1. Necessity is the mother of all invention. What human or natural motivation creates the greatest advancements in engineering?

○ War
○ Threat of war
○ Disease
○ Famine
○ Money

Submit Survey View Results

Product Introduction Challenges?

Communication is key

ENGINEERING.com Collaboration Suite

ELECTRICAL   MECHANICAL   CIVIL   AEROSPACE   CHEMICAL   MATERIALS

Inside Japan Inc. Renesas CEO Saturo Ito talks about business after the...

Sponsored Link: Getting Ready for Windows Vista National Instruments experts help you take advantage of the...

PDA shipments post strong growth Worldwide shipments of personal digital assistants (PDA)...

Digi-Key signs new agreements Digi-Key Corporation will carry Souriau Connection...

Ads by Google   Engineering   Engineer   Energy Jobs   Job

FREE File Sharing Workspace
- privately share files online
- new, easy to use interface
- invite friends and colleagues
- up to 1GB of disk space
CLICK HERE TO START

CAREERS

Improve your salary! Our career section includes interesting articles and connects job seekers with engineering firms around the world.

Civil Designer (Mar 4)
Civil Engineer (Mar 2)
Project Manager (Mar 2)
Architectural/Assistant... (Feb 28)
Pre-Sales Solution Engineer (Feb 28)

Free Job Postings   **More Job Listings**

FREE DOWNLOADS

Our software repository has many CAD & CAM tools as well as other engineering utilities.

3D Stress Analyzer	976
Beam Analyzer	596
Beam Boy Analysis Tool	553
3DAnywhere	449
2D Stress Anaylzer	426

More Free Downloads

CETOL Tolerance Analysis
Pro/E & CATIA integrated tolerance analysis s/w, consulting & training
www.sigmetrix.com
Ads by Google   Advertise on this site

GAMES & PUZZLES

Need a break? Take a timeout with our collection of games and puzzles.

Curveball
Play against the computer in a three dimensional "ping-pong" type game

More Games and Puzzles

TOP CALCULATORS

Take advantage of our collection of useful scientific and engineering calculators and conversion tools.

Energy Conversion Calculator	2139
Concrete Volume Calculator	1799
Water Pump Engineering	1618
Open-channel Flow Calculator	1493
Block Wall Calculator	1150

More Calculators

ENGINEERING.com COMMUNIQUÉ   The latest news, technology advancements, and events in the engineering world.

COMMUNIQUÉ ARCHIVE
SUBSCRIBE NOW

Advanced Math and Engineering Tool
Smart working environ powerful computation and connectivity to a chain.
www.maplesoft.com

Ads by Googoooogle

Engineering Job
T-Mobile Job Opportunities. Fir technology callin
www.t-mobile.com/job

Engineering Sch
Computer Engine Degrees Online Classes. Get Sta Today
www.ClassesUSA.com

Engineering Job
Searching for eng jobs? Visit our engineering jobs
EngineeringJobDirect

Embedded SW Engineers
Technisource is t premier source fo HW/SW enginee nationwide.
www.technisource.co

Mechanical Eng
Let us Help You the Top Mechani Engineering Deg
www.eDegreeFinder.c

Advertise on this site

Engineers.net
The Engineers' Recruitment Network

The Engineers' Recruitment Network UK

Job Seekers

Announce your availability and submit your resume to hundreds of Employers that visit this site. Employers can contact you directly as soon as a suitable position becomes available.
Post your Resume to Engineers.net!

Member ID: [   ]
Password: [   ]

[Login]

Join now! | Forgot your password?

Find Jobs	
Job Area	[Select] ▼
Job Title	[ ]
Job Location(s)	[ ]
Description	[ ]
Job Type	[Select] ▼
	[Find]

EMPLOYERS' LOGIN and services: Post a Job! / Manage Jobs Posts / View Resumes

RSS 2.0 | MY YAHOO! | Add to Google | MY MSN+ |

Sponsored Listings

Browse Jobs by Category

▶**Engineering ALL** (60)
  Aeronautical (2)
  Automotive (2)
  Building Services (0)
  Chemical/Process (0)
  Civil (1)
  Electrical (4)
  Electronic (1)
  Facilities Management (1)
  Field (1)
  Gas Service (0)
  Geotechnical (3)
  Maintenance (0)
  Manufacturing (1)
  Marine (1)
  Materials (0)
  Mechanical (6)
  Nuclear (1)
  Oil/Gas (2)
  Other (5)
  Project Manager (2)
  Software/Systems (21)
  Structural (1)
  Telecoms (5)
  Utilities (0)
▶**Job Type** (60)
  Contract (5)
  Part-Time (0)
  Permanent (53)
  Temporary (2)
▶**Location** (60)
  UK (60)

Date	Job Title	Job Location(s)
2007-Mar-01	**Lead Safety Engineer** ⊞ Posted By: *Nigel Roberts* Category: **Permanent** Lead Safety Engineer - £30K -£60K - Buckinghamshire (Nuclear safety, defence, military, automotive, ALARP, FMEA) Our client is a leading aerospace and defence electronics company with sales ...	**Buckinghamshire**
2007-Mar-01	**Quality Engineer** ⊞ Posted By: *Nigel Roberts* Category: **Permanent** My client is looking for a Quality (Systems) Engineer £25k+ - Avon (QA Engineer, mechanical engineering, ISO 9000, Defence) It is anticipated that the Quality Engineer will be familiar with ISO 9...	**Avon**
2007-Mar-01	**Senior Electrical Design Engineer** ⊞ Posted By: *Impact Recruiting Ltd* Category: **Permanent** Our Client requires an experienced electrical engineer to join a rapidly growing team. The ideal candidate must be chartered and with extensive experience in the building services design industry. The...	**Sawbridgeworth**
2007-Mar-01	**Intermediate Electrical Engineer** ⊞ Posted By: *Impact Recruitment Ltd* Category: **Permanent** Our Client requires an intermediate electrical design engineer to	**Sawbridgeworth**

Engineerjobs, the engineering job source, provides fast-loading and easily accessible job listings for engineers and technical professionals. You can browse or search engineering and technical jobs from all over the United States.

Browse jobs by state:

AK	AL	AR	AZ	CA	CO	CT	DC	DE	FL	GA
HI	IA	ID	IL	IN	KS	KY	LA	MA	MD	ME
MI	MN	MO	MS	MT	NC	ND	NE	NH	NJ	NM
NV	NY	OH	OK	OR	PA	RI	SC	SD	TN	TX
UT	VA	VT	WA	WI	WV	WY				

Job Seekers:

Jump to:

▶ Submit your resume
▶ Company List

RSS Jobs via RSS

Free Engineering Publication Subscriptions!
Click here to subscribe!

Featured Employers:

▶ ThinkEnergyGroup.com

Quick links for the jobtitle:

▶ Chemical Engineer
▶ Civil Engineer
▶ Electrical Engineer
▶ Environmental Engineer
▶ Industrial Engineer
▶ Manufacturing Engineer
▶ Mechanical Engineer
▶ Process Engineer
▶ Project Engineer
▶ Software Engineer
▶ Structural Engineer

Employers:

If you're a company looking to hire engineers and technical professionals, be sure to check our great regular advertising rates.

Related Links | Privacy Statement

EngineerJobs.com advertising rates

Page Produced By Exact Graphix

Copyright 1996-2007 EngineerJobs.com, the Engineering Job Source

Engineer.us
What you need, when you need it

Main	Popular
» Anniversary Gift	Key «
» Engineering Job	Guitar «
» Employment	Teacher Gift «
» Job Search	Golf Gift «
» Engineer	Baby Gift «
» Job	Graduation Gift «

Engineer.us favorites: New Home Gift | Copyright | Drum | Doctor | Engineering | Keyboards

© Engineer.us 2006 | Bookmark this page | Make this your homepage

EXHIBIT C

what

job title, keywords or company name

where

city, state or zip code   *(optional)*

Find Jobs

Advanced Job Search
Preferences

My recent searches - clear

aeronautical engineer

engineer

About | Blog | Job Trends | Salaries | Forums | Browse Jobs | Tools | Advertisers | Publishers | Contact

©2007 Indeed

Indeed

Publisher Login

Email: _____

Password: _____

[Login]

Forgot your password?

Nurse jobs in Texas

Registered Nurse
Raymondville, TX - Medical Connections

Registered Nurse ICU Travel
Pasadena, TX - Medical Connections

Registered Nurse Telemetry
Texas City, TX - Medical Connections

Registered Nurse ER Travel
Texas City, TX - Medical Connections

Registered Nurse PACU Travel
San Antonio, TX - Medical Connections

Enter search terms... [Go]

www.**indeed**.com

For Web Publishers

Add Job Search to Your Site - Get Paid!

Become an Indeed affiliate and earn more money from your website by including job search. Indeed provides the most comprehensive job search available – enabling your users to search millions of jobs from thousands of company websites, job boards, and newspaper websites.

Start earning today by adding one or more of the following to your blog or website:

» **Jobroll** - display an updating list of sponsored job listings matching any search. See the "Nurse jobs in Texas" example to the left.

» **Job search box** - enable your users to search Indeed directly from your website.

» **Text link** – link to a page of search results on Indeed or just to our home page.

Signup Now!

Custom Job Search Solutions

Use our free XML API to create your own custom job search solutions.

We have also built custom solutions for The New York Times, About.com, Boston.com, Vivisimo, Info.com and others. If you are interested in a custom built solution or would like to partner with Indeed - please **contact us**.

If you would like to advertise on Indeed, learn more.

Indeed.com | Indeed Publisher Home | Terms of Service | Contact Us

©2007 Indeed

Indeed

Publisher Login

Email: [   ]

Password: [   ]

[Login]

Forgot your password?

Nurse jobs in Texas

Registered Nurse
Raymondville, TX - Medical Connections

Registered Nurse ICU Travel
Pasadena, TX - Medical Connections

Registered Nurse Telemetry
Texas City, TX - Medical Connections

Registered Nurse ER Travel
Texas City, TX - Medical Connections

Registered Nurse PACU Travel
San Antonio, TX - Medical Connections

[Enter search terms...] [Go]

www.**indeed**.com

For Web Publishers

Add Job Search to Your Site - Get Paid!

Become an Indeed affiliate and earn more money from your website by including job search. Indeed provides the most comprehensive job search available – enabling your users to search millions of jobs from thousands of company websites, job boards, and newspaper websites.

Start earning today by adding one or more of the following to your blog or website:

» **Jobroll** - display an updating list of sponsored job listings matching any search. See the "Nurse jobs in Texas" example to the left.

» **Job search box** - enable your users to search Indeed directly from your website.

» **Text link** – link to a page of search results on Indeed or just to our home page.

Signup Now!

Custom Job Search Solutions

Use our free XML API to create your own custom job search solutions.

We have also built custom solutions for The New York Times, About.com, Boston.com, Vivisimo, Info.com and others. If you are interested in a custom built solution or would like to partner with Indeed - please **contact us**.

If you would like to advertise on Indeed, learn more.

Indeed.com | Indeed Publisher Home | Terms of Service | Contact Us

©2007 Indeed

Terms of Service

Indeed Publisher Program Terms

This agreement between You ("Publisher") and Indeed Inc. ("Indeed") sets out the terms and conditions ("Terms and Conditions") applicable to your participation in the Indeed Publisher Program (the "Program"). The Program, as generally offered by Indeed, is described on https://ads.indeed.com/jobroll or such other URL as Indeed may provide from time to time. "You" or "Publisher" means any entity identified in an enrollment form submitted by the same or affiliated persons, and/or any agency or network acting on its (or their) behalf, which shall also be bound by these Terms and Conditions.

Indeed shall have absolute discretion as to whether or not it accepts a particular applicant or site for participation in the Program. Sites are ineligible to participate if they do not conform with the terms of the Indeed Affiliate Acceptable Use Policy, located online at AAUP (the 'AAUP'). In order to participate as a publisher in the Program, all participants must be at least eighteen years of age. Applicants represent and warrant that all information submitted to Indeed shall be true, accurate and complete.

Publisher Obligations

Any job search results, Jobroll^{TM}, Job Search Box, pay-per-click advertisements, links, insertion code, and any Indeed logos or other elements supplied by Indeed for use on Affiliates' websites or websites co-branded by Indeed and Affiliate (collectively, "Program Elements") may only appear on URLs that Indeed has reviewed and accepted for participation ("Accepted URLs"). Publisher shall advise Indeed of any changes in the type of content accessible at any such accepted URL. Publisher agrees to comply with the specifications provided by Indeed from time to time to enable proper delivery, display, tracking and reporting of Program Elements.

Publisher shall label each displayed Program Element with one of the following text descriptions: 'powered by Indeed' or 'ads by Indeed'.

Publisher agrees to abide by all terms of the AAUP. Indeed reserves the right in its sole discretion to suspend Publisher's participation in the Program if it suspects any violations of the AAUP. Publisher hereby agrees to defend, indemnify and hold Indeed harmless from and against any claims, demands, liabilities, expenses, losses, damages and attorney fees arising from or relating to a violation or purported violation by Publisher of the AAUP. The foregoing shall be in addition to, and not in lieu of, any other remedies that Indeed may have as a result of a violation of the AAUP by Publisher.

Payments to Publisher

Publisher shall receive payment related to the revenue actually received by Indeed with respect to valid clicks in relation to Program Elements displayed on Accepted URLs, in each case as determined by Indeed for its participants in the Program in its sole discretion. Publisher shall not be compensated for any transactions generated by Publisher or any party acting on Publisher's behalf. In addition, if Indeed is responsible for refunding revenue to a job sponsor or other advertiser because of artificial and/or fraudulent impressions or clicks, then Publisher shall refund the share of that revenue paid to Publisher.

Indeed shall pay Publisher within 30 days of the end of each calendar quarter; provided the amount owing to Publisher is at least one hundred US dollars ($100). If the amount owing to Publisher is less than $100, the balance will carry over to subsequent calendar quarters until such time that the quarter-end balance is at least one hundred US dollars ($100). Publisher is solely responsible for providing and maintaining accurate contact and payment information associated with Publisher Account.

Indeed may withhold any and all payment if Publisher is in breach of any Terms and Conditions and Indeed shall have no further liability to Publisher.

Termination

Either party may terminate this Agreement and participation in the Program at any time by sending a notice by email to support-at-indeed dot com or other email address specified by Indeed in the case of Indeed, and to the email address specified in Publisher's profile in the Program in the case of Publisher.

Upon termination of a publisher from the Program, for any reason and by either party, Publisher shall immediately remove all insertion codes and other Program Elements from all pages of its Web sites.

Confidentiality

Publisher shall not disclose Indeed Confidential Information without Indeed's prior written consent. "Indeed Confidential Information" includes without limitation: (a) all Indeed software, technology, programming, specifications, materials, guidelines and documentation relating to the Program; (b) click-through rates or other performance statistics relating to the Program provided to Publisher by Indeed; and (c) any other information designated in writing by Indeed as "Confidential" or an equivalent designation.

INDEED'S PROVISION OF THE PROGRAM AND PROGRAM ELEMENTS (THE 'SERVICE') IS PROVIDED ON AN "AS IS" AND "AS AVAILABLE" BASIS. INDEED EXPRESSLY DISCLAIMS ALL WARRANTIES OF ANY KIND, WHETHER EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND NON-INFRINGEMENT. INDEED MAKES NO WARRANTY THAT (i) THE SERVICE WILL MEET PUBLISHER'S REQUIREMENTS; (ii) THE SERVICE WILL BE UNINTERRUPTED, TIMELY, SECURE OR ERROR-FREE; (iii) THE RESULTS THAT MAY BE OBTAINED FROM THE USE OF THE SERVICE WILL BE ACCURATE OR RELIABLE; AND (iv) ANY ERRORS IN THE SERVICE WILL BE CORRECTED.

INDEED SHALL NOT BE LIABLE FOR ANY DIRECT, INDIRECT, CONSEQUENTIAL, SPECIAL, INCIDENTAL OR OTHER DAMAGES INCURRED BY PUBLISHER FROM PARTICIPATION IN THE PROGRAM, WHETHER BASED IN CONTRACT (INCLUDING FUNDAMENTAL BREACH), TORT (INCLUDING NEGLIGENCE) OR OTHERWISE. IN NO EVENT SHALL INDEED'S AGGREGATE LIABILITY EXCEED THE AMOUNT OF FEES THEN DUE TO PUBLISHER AS DETERMINED PURSUANT TO THESE TERMS AND CONDITIONS.

Miscellaneous
(i) Indeed reserves the right to change the Terms and Conditions at any time.
(ii) Publisher grants Indeed permission to refer to Publisher and its Websites in its marketing materials.
(iii) These Terms and Conditions and any dispute arising from participation in the Program shall be governed according to the laws of the State of Connecticut.

Indeed.com | Indeed Publisher Home | Terms of Service | Contact Us

©2007 Indeed

EXHIBIT D

indeed™
one search. all jobs.

what

aeronautical engineer

job title, keywords or company name

where

city, state, or zip

Find Jobs

aeronautical engineer jobs

Jobs 1 to 10 of 1,128

« Hide Refinements

▶ ✉ Save this search as an email job alert or RSS feed

Tip: Enter your zip code in the "where" box to show results in your area.

▼ **Title**

Systems Engineer (20)
Structural Engineer- Aircr
Engineer 3 (Flight Test) (1
Elastomers Engineer (14)
Aeronautical Engineer Sr
more »

▶ **Company**

▶ **Location**

▶ **Job Type**

▶ **Employer/Recruiter**

▼ **Recent Job Searches**
engineer
» clear searches

Aeronautical Engineer Sr Stf   Sponsored Job
Lockheed Martin - Edwards Air Force Base, CA
From CareerBuilder - 4 days 4 hours ago

Sort by: **relevance** - date

Aeronautical Engineer Stf
Lockheed Martin (197 comments) - Louisiana +3 locations
Job Title **Aeronautical Engineer** Stf Standard Job Code/Title E1454:**Aeronautical Engineer** Stf Required... Analysis Job Class **Aeronautical** Engineering Job...
From NOLA.com - 1 day 9 hours ago - save job -
    more...

Aeronautical Engineer Asc
Lockheed Martin (197 comments) - Louisiana
Job Title E1451:**Aeronautical Engineer** Asc Standard Job Code/Title E1451:**Aeronautical Engineer** Asc Required... Analysis Job Class **Aeronautical** Engineering Job...
From NOLA.com - 3 days 8 hours ago - save job -
    more...

Aeronautical Engineer
Lockheed Martin (197 comments) - US +3 locations
Space Systems Company Department 4160:Propulsion Analysis Job Class **Aeronautical** Engineering Job Category Experienced Professional State Louisiana Relocation...
From Lockheed Martin - 4 hours 38 minutes ago -
save job -   more...

Aeronautical Engineer Sr Stf
Lockheed Martin (197 comments) - Edwards Air Force Base, CA +4 locations
Lead **Engineer** responsible for day-to-day direction... and documentation. B.S. or higher degree in **Aeronautical** or Mechanical Engineering with 14 years...
From CareerBuilder - 4 days 4 hours ago - save job -
    more...

Aeronautical Engineer Sr
Lockheed Martin (197 comments) - US +3 locations
Technology Services Department 7144024:ISS Cargo Mission (OS) Job Class **Aeronautical** Engineering Job

Email this page to a friend

XML RSS FEED

Engineer.info
Where the engineer finds information
www.engineer.info

| Home | My Jobs | FAQ |

1127 Aeronautical Engineer Job Listings In the USA

What type of engineer?

aeronautical   State Any ▼   **SEARCH >>**

Email this page to a friend

Results 1 - 20 of 1127 listings for Aeronautical Engineer

Next 20 -->

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Delaware
Dist. of
Columbia
Florida
Georgia
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska
Nevada
New
Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
Rhode Island
South Carolina
South Dakota
Tennessee

3/9/2007
Aeronautical Engineer - , - Lockheed Martin
Space Systems Company Department 4160:Propulsion Analysis
Job Class **Aeronautical** Engineering Job Category Experienced
Professional State Louisiana Relocation...
Source: Lockheed Martin

3/9/2007
Aeronautical Engineer Asc - , **LA** - Lockheed Martin
Job Title E1451:**Aeronautical Engineer** Asc Standard Job
Code/Title E1451:**Aeronautical Engineer** Asc Required...
Analysis Job Class **Aeronautical** Engineering Job...
Source: NOLA.com

3/9/2007
Aeronautical Engineer Sr Stf - **Edwards Air Force Base, CA** -
Lockheed Martin
Lead **Engineer** responsible for day-to-day direction... and
documentation. B.S. or higher degree in **Aeronautical** or
Mechanical Engineering with 14 years...
Source: CareerBuilder

3/9/2007
Aeronautical Engineer Stf - , - Lockheed Martin
Primary Mass Properties **Engineer** for the U-2 program...
Department 6C2P20:Mass Properties Job Class **Aeronautical**
Engineering Job Category Experienced Professional...
Source: Lockheed Martin

3/9/2007
Aeronautical Engineer Sr - , - Lockheed Martin
Technology Services Department 7144024:ISS Cargo Mission
(OS) Job Class **Aeronautical** Engineering Job Category
Experienced Professional State Texas Relocation...
Source: Lockheed Martin

3/9/2007
Aeronautical Engineer Sr - , - Lockheed Martin
Technology Services Department 7144024:ISS Cargo Mission
(OS) Job Class **Aeronautical** Engineering Job Category
Experienced Professional State Texas Relocation...
Source: Lockheed Martin

IMMEDIATE NEED FOR AERONAUTICAL ENGINEERS

Aeronautical Engineer Sr Stf
Edwards Air Force Base, CA - Lockheed Martin

Aeronautical Engineer Stf
Louisiana - Lockheed Martin

Aeronautical Engineer
US - Lockheed Martin

Aeronautical Engineer Asc
Louisiana - Lockheed Martin

Aeronautical Engineer Stf
US - Lockheed Martin

Aeronautical Engineer Sr
US - Lockheed Martin

Aeronautical Engineer Sr Stf
US - Lockheed Martin

E1452:Aeronautical Engineer
US - Lockheed Martin

E1454:Aeronautical Engineer Stf
US - Lockheed Martin

E1455:Aeronautical Engineer Sr Stf
US - Lockheed Martin

Engineer V (Stress)
San Diego, CA - Aeronautical Systems Engineer I
Bethesda, MD - ASRC Federal Holding Company

EXHIBIT E

TLR   )   Case No. D2007-0148
)
)
v.   )
)   ENGINEER.INFO
United Engineering Service LLC   )   ENGINEER.BIZ
)

DECLARATION OF JEFFREY KRUS
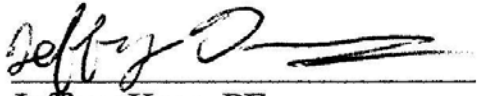
I, Jeffrey Krus, declare as follows under penalty of perjury:

1. I am 34 years old and reside in Bloomfield Hills, Michigan.

2. I am a registered professional engineer in the State of Michigan. A copy of my license is attached hereto as Krus Exhibit 1.

3. I am the principal of United Engineering Service LLC (UES). Under UES, I provide consulting services in the area of structural engineering. Such consulting work includes structural design of buildings and modifications of existing buildings. I have, at various times, employed up to 10 others on a contract basis.

4. I registered the domain name engineer.biz to utilize as an email address in order to maintain electronic communications, including communication of confidential information, with my clients. I have used the domain name engineer.biz for this purpose since shortly after registering it, and I continue to use it for this purpose.

5. My email address at engineer.biz is in many address books maintained by my clients and contractors, and the loss of the domain name would substantially disrupt my business.

6. I do not maintain an independent website for engineer.biz, and I direct web traffic for that domain name to engineer.info.

7. I obtained the domain name engineer.info in a trade for the domain name designer.info which I had previously registered. A copy of the agreement under which this trade was made is attached as Krus Exhibit 2.

8. I have used the domain name engineer.info to provide a directory of job listings which I receive from Indeed.com under a publisher agreement. Indeed.com is an internet search engine for job listings, which permits affiliates to publish job listings consolidated by Indeed.com.

9. I do not know where Indeed.com obtains all of its job listings. On information and belief, Indeed.com collects job listings from other employment websites, in addition to providing their own job listing service, and then provides those listings to Indeed.com affiliates.

10. I do not solicit or publish employment advertisements. I publish engineering job listings under the publisher agreement with Indeed.com.

11. My website includes a "Frequently Asked Questions Page" under which I state that I do not solicit job listings. I refer such inquiries to another party, and I am not compensated for those referrals.

12. I am aware that someone calling himself "TLR" has accused me of copying content from its website at engineer.net. I have never copied content, scripts, or job listings from engineer.net.

13. TLR's statement that I copied content from their website is a lie.

14. It is my understanding and belief that TLR uses a free scripting language - PHP - to generate content at its website. I do not use PHP to generate content at my website. I use a proprietary Microsoft scripting language - ASP. PHP and ASP are not compatible scripting languages.

15. I am aware that TLR has accused me of "cyberflight". Until early 2007, I resided in Washington, Michigan. In early 2007, I moved to Bloomfield Hills, Michigan.

16. When I moved to Bloomfield Hills, Michigan, I updated the WHOIS information for my domain names. As the principal of United Engineering Service LLC, I also updated the WHOIS information to reflect my use of the domain names for my company. I also filed a change of address with the Michigan Secretary of State.

17. TLR's suggestion that I moved from Washington to Bloomfield Hills because TLR had sent me a letter, is a lie.

18. Several years ago, I posted an advertisement at engineer.net. I received no leads from the advertisement, and I discontinued the advertisement. I did not enter into any agreement with engineer.net under which I am required to avoid using the word "engineer" or under which I am required not to enter into a publisher agreement with Indeed.com.

19. I do not believe that "TLR" owns the word "engineer". As an engineer, I am offended by the suggestion that a fictitious entity can claim an exclusive right in the word "engineer" for the purpose of providing job listings for engineers.

I further declare that all statements of fact herein are true, and all statements made on information and belief are believed to be true.

March 9, 2007

_____
Jeffrey Krus, PE
United Engineering Service LLC

KRUS EXHIBIT 1

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LABOR & ECONOMIC GROWTH

A 432404

BOARD OF PROFESSIONAL ENGINEERS
PROFESSIONAL ENGINEER
LICENSE

JEFFREY A KRUS
5720 WHETHERSFIELD 1B
BLOOMFIELD HILLS MI 48301

PERMANENT I.D. NO.	EXPIRATION DATE	
6201048546	10/31/2008	1782880

KRUS EXHIBIT 2

Letter Of Agreement   Aug. 21, 2002

Parties involved:

1. Jeffrey Alan Krus
   54732 Shelby Rd. #131
   Shelby Twp. MI. 48316

2. Tony Sola
   PO Box 41182
   Mesa, AZ. 85274

Description of property involved:

In General:
Internet Domain Names

In Detail:

Engineer.info currently owned by Tony Sola
Designer.info currently owned by Jeffrey Krus

Description of agreement:

In General:
Both parties agree to exchange complete ownership of the domain names described in this agreement.

In Detail:
Jeffrey Krus agrees to transfer complete and unrestricted ownership of the domain name **designer.info** to Tony Sola.

Tony Sola agrees to transfer complete and unrestricted ownership of the domain name **engineer.info** to Jeffrey Krus

Execution of agreement:

Upon approval of this agreement by both parties, Jeffrey Krus shall sign, date, and notarize two (2) copies. Both signed copies shall be sent to Tony Sola in their original form for his final review. Upon approval of this agreement, Tony Sola shall sign, date, and notarize both original copies. Tony Sola will retain one (1) original copy and send one (1) original copy to Jeffrey Krus. Upon receiving this agreement, Jeffrey Krus shall notify Tony Sola of his receipt of this agreement. Both parties will confirm their receipt of original, signed, dated, and notarized copies of this agreement. At this time, each party will transfer ownership of their domain name to the other party. The ownership exchange shall be completed within thirty (30) days from the date both parties receive their signed, dated, and notarized copy of this agreement. After ownership transfer is completed, Jeffrey Krus will be the owner of the domain name Engineer.info and Tony Sola will be the owner of the domain name Designer.info. If for any reason the ownership transfer of one (1) or both of the domain names are not completed within sixty (60) days from the latest signing date listed below, both domain names will revert to their original ownership status as defined under "Description of property involved:" in this agreement.

Signed:

Jeffrey A. [signature]   8/22/02
Jeffrey A. Krus   Date

Notary Stamp:

This foregoing instrument was acknowledged before me this 22ND day of August ,2002 by

Jeffrey A. Krus

Bella Shayevich , Notary Public   Oakland MI (Michigan) County, State

Signed:

Tony Sola [signature]   8/26/02
Tony Sola   Date

Notary Stamp:

This foregoing instrument was acknowledged before me this 26 day of Aug 2002 by

Tony Sola

[signature] , Notary Public   Maricopa, AZ County, State

EXHIBIT F

the engineer job search engine™

post engineering jobs without the scary price !

Engineering Employment Tools for Job Search, Job Posting, and Engineering Resumes

home

Employers:

Select FREE TRIAL
– register now –

easy as 1-2-3..
Post Jobs
FAQ's
log-in, register

Engineers:

Jobs

browse jobs
search jobs
job feed RSS
entry level
professional level
post your resume
log-in, register
FAQ's

Articles

"Farewell Engineer
Scott" NEW

"Engineer Career
Outlook" NEW

"Tips to Survive
Offshore
Outsourcing"

"On Engineering
Salary"

Resources

Salary Reports

Resume Consulting

PE & FE/EIT Study Guides..

Links

Link to Us and
get **FREE Email**

TenLinks
Site of
the Week

Browse Engineering Jobs | Search Engineering J

These are engineering jobs listed by employers seeking qualified engineers. Engineer.net™ lists engineering jobs and resumes for aerospace, chemical, civil, electrical, indu
engineering. These engineering positions are in the United States and are engineering job openings for engineers only. Employers sign up here. Engineers post your resum
Engineer Job Search Engine™ page.

Sort by: **Featured Jobs   State   City   B**

Featured Jobs	Company
Software Developer	Dowless & Associates
AC Motor Development Engineer	The Ross-Carlisle Group Inc.
Utilities & Water Engineer	INEOS Olefins & Polymers
Director, Software Engineering	Panasas
Estimator	Eai Search, Inc.
PE or EE Data Center Evaluation	Michael Williams Inc.
Civil Engineer	Maverick Engineering
Sales Engineer (Industrial/Medical/Healthcare/Commercial/Pharmaceutical)	The Ross-Carlisle Group Inc.
Sr Electrical Engineer	Process Plus
Industrial Engineer	Redcats USA
Professional Engineer - Mechanical	Analysts International
Professional Engineer - Electrical	Analysts International
Wind Resource Assessment Meteorologist	Paragon Group International
Backflow Engineer	Danfoss Flomatic
Technical Marketing/Engineering Specialist	Employment Enterprises, Inc
Project Engineer	SunEdison
Sr. Project Engineer	SunEdison
Capital Development Engineer	Cadbury Schweppes
Sr. Java Web Developer	Unified Development
Civil Engineer/Product Manager	Corporate Recruiters Ltd.
Customer Engineer	voltdelta resources

Engineer.net(tm) - Engineering Jobs News Feed

Hot Engineering Jobs that were just posted minutes ago

Software Developer

Dowless & Associates has an opening for a Software Developer in our Chantilly, VA location. Candidate will work on fixing software discrepancies and

Software Engineer

Dowless & Associates has an opening for a Software Engineer in our Chantilly, VA location. The successful candidate shall provide data migration and

Sales Engineer

Sales Engineer RE: 015-07-013 A manufacturer known for its innovative cutting edge commercial and industrial instrumentation is offering a great opp

AC Motor Development Engineer

AC Motor Development Engineer Location: Southwest Ohio Salary: 80,000.00 - $110,000.00 Re: 016-07-004 Duties Responsible for the most technic

Lead Civil Engineer

National leader in infrastructure design and planning corporation is seeking to hire a Lead Engineer. The appropriate Civil Engineer Lead will have

Utilities & Water Engineer

INEOS is a rapidly growing manufacturer of petrochemicals, specialty and intermediate chemicals and polymers. INEOS includes 68 manufacturing faciliti

Director, Software Engineering

The Director, Software Engineering is responsible for leading the vision and direction of product development of a team of 30 or more software develop

Estimator

Eai Search, Inc is seeking a Estimator for one of the largest rental companies in the world. We are searching for qualified candidates to develop cost

PE or EE Data Center Evaluation

Contract assignment with the possibility of converting to a full time employee. Candidate must have the ability to address all aspects of MEP infrast

Civil Engineer

The Civil Engineer performs hands-on design engineering for drainage and detention, flood control, water, wastewater and roadway projects for city and

Sales Engineer (Industrial/Medical/Healthcare/Commercial/Pharmaceutical)

Sales Engineer RE: 014-07-013 A Midwestern manufacturer known for its innovative cutting edge commercial and industrial instrumentation is offering

Sr Electrical Engineer

Sr Electrical Engineer for Dynamic Engineering Company About the Company Process Plus is a dynamic and exciting engineering company offering grow

Industrial Engineer

Overall Responsibilities This position will be responsible for working with Redcats USA Brands on specific engineering requests relating to time and

Professional Engineer - Mechanical

Seeking three strong PE's to join their team in Louisville and Lexington, KY. Qualified candidates will have the following: PE License - 4 yea

Professional Engineer - Electrical

Client is seeking 2 strong Licensed Professional Engineers to join their team (1 for Louisville and 1 for Lexington) Will be responsible for: D

Wind Resource Assessment Meteorologist

EXHIBIT G

products　styles　projects

quick access　　All Catalogs　▼ go　search　All Catalogs　▼　　　　go

EarthTech - HTML

Developed by:
John Galt (learn more)

Comments:
Maintain your global, professional image
with the EarthTech web template.
Embedded Flash movie in the corner may
be replaced with a static jpeg.

CSS, Flash/Swish, Photoshop Included

$59.99

Add to Cart
Save For Later
See In action

Keywords
EarthTech, Earth, Tech, Globe, Global,
World, Blue, Orange, Space

Other Products in this Style: (View all products in this style.)
EarthTech-FrontPage Template, EarthTech-Dreamweaver Template, EarthTech-HTML
Template, EarthTech-PowerPoint Template, EarthTech-Outlook Stationary,
EarthTech-Word Template

002tgfp_business_br FP 2000+ $40	**008tgfp_health-medical_bl** FP 2000+ $40	**008TGp_BizCom_light** PP 2000+ $24
009tgfp_computer-ibm_bl FP 2000+ $49	**009TGp_Computer_light** PP 2000+ $24	**009TGp_Computer_new** PP 2000+ $24
01_neo_blue PP 2000+ $33	**010tgfp_education-ibm_green** FP 2000+ $49	**010TGp_BizCom_bl** PP 2000+ $24

Title of Page

Home
Job Searching
Employers
FAQ
Advertise Here
Terms of Use
Privacy Policy

Other content here

horizontal links

The EarthTech Dreamweaver package

This Dreamweaver package features:

- Two HTML page templates which you may easily use to create new pages. One page template includes a right column with info boxes (earthtech), the other one does not (earthtech_one).
- An HTML page that is fully editable.
- Library items for the footer, info boxes, and product catalog tables to help you easily insert the elements you need.
- An external JavaScript code file for the rollover effects in the upper right corner. Basic instructions included for those who wish to include more rollover effects. Basic knowledge of JavaScript rollovers required to edit the JavaScript file; however, you don't need to know JavaScript if you will be using the built-in DreamWeaver rollover effects.
- Vertical, horizontal, and bottom back, next, up, and home navigation button graphics, in GIF and Photoshop formats.
- Additional graphics. See below.
- An external Cascading Style Sheet. Degrades well.
- An embedded Flash movie to add subtle movement to your page. Also includes a static jpeg which you may use to replace the Flash movie for a static site.

Where to Start

This Dreamweaver package comes with two page templates. You may choose earthtech (includes right column with info boxes) or earthtech_one (one-column layout).
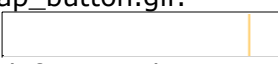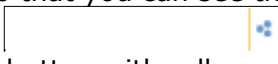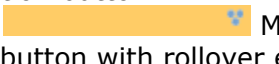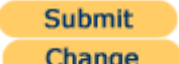
This Dreamweaver package contains several library items.

- The "Read Me Content" is a library item so that you may easily delete it from your new page and add your own content, but still be able to access the information if you need to.
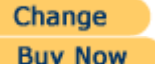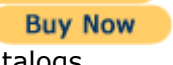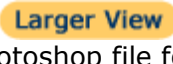- The bottom "footer" is a library item which you will want to customize with your own company name. You may also wish to put text links or additional information there.
- The "Info Box Table" library item allows you to create more info boxes easily in your page. You must "Detach from Original" so that you may edit the text.
- The "Product Catalog Item" allows to easily create more product item tables in your catalog pages. Once again, you will want to "Detach from Original" so that you may edit the text. Simply delete the "Read Me Content" library

Info Box

These info boxes are perfect for updates and news.

Duplicate this info box easily in Dreamweaver using the Library. Open the Library palette and insert the Info Box Table into your page. Then right-click on your inserted box and choose "Detach from Original." Now you may edit the text within.

The external style sheet defines an "infobox" class for smaller font within the info box.

object and replace it with the Product Catalog Item. The "Product Detail" library item allows you to easily create more product detail pages. Delete the "Read Me Content" object and replace it with a copy of the Product Detail library item. Once again, "Detach from Original" in order to edit the text.

The templates have specified editable areas which you may change, and you will probably find the template very flexible. You cannot change the main column layout, which is why we include two page templates. If you find that you require more flexibility than what the page templates provide, you may use the included HTML page (editable.html), which is not based on a page template and is fully editable.

Graphics

- **circles.gif** For extra accents.
- **home_button.gif** For top right corner, to be used with home_button_select.gif.
- **home_button_select.gif** For top right corner, to be used with home_button.gif.
- **contact_button.gif** For top right corner, to be used with contact_button_select.gif.
- **contact_button_select.gif** For top right corner, to be used with contact_button.gif.
- **map_button.gif** For top right corner, to be used with map_button_select.gif.
- **map_button_select.gif** For top right corner, to be used with map_button.gif.
- **vertical.gif** Used as the background image in the left vertical navigation table. Also may be edited for vertical navigation buttons in an image editor. (Border is set to 1 so that you can see the image.)
- **vertical_select.gif** May be used as the selected vertical button with rollover effects. (Border is set to 1 so that you can see the image.)
- **vertical.psd** Photoshop file.
- **horizontal.gif** May be used in the orange row as a navigation button.
- **horizontal_select.gif** May be used as the selected horizontal button with rollover effects.
- **horizontal.psd** Photoshop file.
- **submit.gif** May be used in forms.
- **change.gif** May be used in forms.
- **buynow.gif** May be used in forms and ecommerce catalogs.
- **checkout.gif** May be used in shopping carts.
- **largerview.gif** May be used in catalogs.
- **buttons.psd** Photoshop file for buttons.

JavaScript File

An external JavaScript file is included with this HTML package for the rollover effects in the upper right corner. The code is fairly straightforward and may be used for other rollover effects.

To create more rollover effects using the included external JavaScript file:

- Create the two graphics you will use: an "inactive" image which the user will first see, and an "active" image which the user will see when they roll over the link. We suggest the naming convention of "imagename.gif" and "imagename_select.gif".
- Embed the inactive image into your web site. Be sure to use the "name" attribute. The name you give this image must be unique from any other names on your page. For example: `<IMG SRC="images/support.gif" BORDER="0" WIDTH="100" HEIGHT="23" NAME="support">`
- Go into "rollover.js" in a text editor. At the bottom of the file is the loadImages function. Follow the format of the previous lines and type something like:
  `support_select = newImage( "images/support_select.gif" );`
  You will want to type in the source of the **inactive** image.
- Now go back to your HTML and create a hyperlink around your inactive image. Inside of the <A> tag, you will want to add something like this:
  `<A HREF="support.html" ONMOUSEOVER="change('support','images/support_select.gif');" ONMOUSEOUT="change('support','images/support.gif');">`
  Basically, the first variable in the "change" function is the NAME of the inactive image, and the second variable is the location of the image that you are changing.

Style Guide

This may help you when you are editing your pages:

Font used: Verdana

Suggested color palette:

Dark Blue	**#003366**
Black	**#000000**
Light Orange	**#ffcc66**
Light Blue	**#0099cc**
Grey	**#cccccc**
Red	**#cc3300**

Cascading Style Sheets

An external style sheet is included with this HTML package. The style sheet defines most commonly used text styles and includes a few custom defined styles or other special styles

described below.

- **ul** The unordered list uses the list-style-image property to use the graphic "bullet.gif" in place of the standard bullets. This style declaration does not work in some earlier browsers and some versions of Netscape, but degrades well.
- **.infobox** This custom style defines a smaller font for use in the left and right columns.
- **.banner** This custom style defines the table cell that holds the page title.
- **.bottom** This custom style defines the table cell that holds the bottom footer information.
- **.nav** This custom style defines the navigation bar text for the horizontal and vertical navigation "bars." For the left navigation bar, it must be used in the <P> tag (to add a left indent) as well as in the <A> tag. For horizontal navigation bars, it may be only used the <A> tag.

You may edit the cascading style sheet on your own; however, support is not provided for this feature.

Copyright 2002 | Engineer.net

EXHIBIT H

From: ro█████████.ge.com [mailto:ro███████████.ge.com]
Sent: Tuesday, April 22, 2003 7:56 AM
To: jeff@engineer.biz
Subject: RE: Engineering & Cad Oppurtunites

Jeffrey,

Thank you for your recent email. I am finishing up at a 500 MW Combined Cycle Gas Turbine Construction Site in the UK at the end of May. I have also attached my Resume for further information. I'm interested in contract work mainly.

Regards,

g *Ro*█████

██████ Project Site Technical Manager
General Electric International Inc.
████████████████ Plant Project
██████████ Park
██████████ UK
🔔 *Tel:* +44 ██████████009
🔔 *Mobile:* +44 ███████████-783
📠 *Fax:* +44 █████████8001
✉ *e-mail:* *ro*██████████*.ge.com*

-----Original Message-----
From: Jeffrey Krus P.E. [mailto:jeff@engineer.biz]
Sent: 20 April 2003 00:08
To: Howe, Robert (PS, Contractor, PPSD)
Subject: Engineering & Cad Oppurtunites

Hello,

I have viewed your resume from Michworks.org. We may be seeking a few people for contract work on a project we are bidding on. Could you please send your most recent copy of your resume?

Jeffrey A. Krus P.E.

From: D█ E██████ [mailto:de██████████technologies.com]
Sent: Wednesday, September 27, 2006 7:27 AM
To: jeff@engineer.biz
Subject: Bldg. info. requested

Jeff,

Attached are the available prints that were used with, (as referenced within), the soils report. The crane info will follow shortly. Please review the prints, and give me a call.

On the site visit, I can request that, but I need to know why it is necessary, so that I can explain it in my request to them. (understand that there really is nothing to ""look"" at on the floor there now, it is just a clear area with bare, finished cement floor.)

Thanks, and look forward to hearing from you,

D█ E██████

C████Technologies

2█████████████03

2█████████ fax

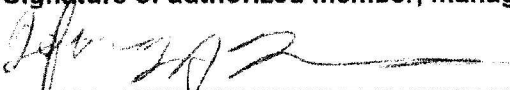2█████████ mobile

"Lifting you to new heights"

EXHIBIT I

MICHIGAN DEPARTMENT OF LABOR & ECONOMIC GROWTH
LIMITED LIABILITY COMPANY ANNUAL STATEMENT

2007

Due February 15, 2007

Identification Number	Limited Liability Company Name
B8314E	UNITED ENGINEERING SERVICES, LLC

1. Resident agent name and mailing address of the registered office

JEFFREY KRUS
P.O. BOX 534
WASHINGTON MI 48094

If different than 1, change resident agent and mailing address of registered office in MICHIGAN.

2. The address of the registered office
4931 BROOKSIDE
WASHINGTON MI 48094

If different than 2, change address of registered office (number, street, city, state, zip) in MICHIGAN.

5720 Whetlersfield 18
Bloomfield Hills, MI. 48301

3. Signature of authorized member, manager or agent.

[signature]

Title	Date	Phone (Optional)
President	1/2/07	

Filing Fee: $25.00
Annual Statement Due February 15, 2007.

Annual Statement Must Be Signed

Domestic: Signature of a manager if management is vested in managers, by at least 1 member if management remains in the members or by an authorized agent of the domestic limited liability company.

Foreign: Signature of a person with authority to do so under the laws of the foreign limited liability company's jurisdiction of organization.

Make your check or money order payale to the State of Michigan.

Return to: Department of Labor & Economic Growth
Bureau of Commercial Services
Corporation Division
P.O. Box 30768
Lansing MI 48909

Required by Section 207, Act 23, Public Acts of 1993