

ADMINISTRATIVE PANEL DECISION

C. & J. Clark International Ltd v. Drescher Karin; Schulze Stefanie; Hoffmann Florian; Name Redacted; Henrik Tess; Wulf Susanne; Fischer Thorsten; Baier Johanna; benjamin vogt; Baer Barbara; Stephanie Werfel; David Bader; Web Commerce Communications Limited, Client Care; Whoisprotection.cc, Domain Admin; Torsten GRUNEWALD; Gabriele ACKERMAN; Uwe Achen; Steffen Schuster; Sven Eisenhauer; Eric Koehler; Lea Muench; Christina Kuster; ming dian; Manuela Ziegler; matilda allen; Paul Fried; Nataliia Kuripko; Andreas Kirsch; David Boehm; Markus Schroder; Felix Fuhrmann; Daniel Beyer; Johanna Barth; Katja Kirsch; Sara Moench; Brigitte Kuester; Yvonne Grunewald; Annett Roth; Uta Weiss; Dennis Bohm; Katrin Winkel; Sophie Adler; Mike Schweizer; Jens Jager; Torsten Kuhn; Jens Keller; Eric Kuster; Juliane Fassbinder; Sabrina Furst; Monika Kaufmann; Mike Klug; Andrea Moench; Simone Luft; Kerstin Eichelberger; Doreen Koch; Marcel Ebersbach; Dieter Hahn; Alexander Schneider; Michelle Baier; Florian Weber; Lena Duerr; Mike Braun; Kevin Eisenhauer; Maria Schaefer; Anna Frey; Maik Wulf
Case No. D2022-0817

1. The Parties

Complainant is C. & J. Clark International Ltd, United Kingdom ("U.K."), represented by SafeNames Ltd., United Kingdom ("U.K.).

The Respondents are Drescher Karin; Schulze Stefanie; Hoffmann Florian; Wulf Susanne; Fischer Thorsten; Baier Johanna; benjamin vogt; Baer Barbara; Stephanie Werfel; David Bader; Torsten GRUNEWALD; Gabriele ACKERMAN; Steffen Schuster; Sven Eisenhauer; Lea Muench; Christina Kuster; Manuela Ziegler; matilda allen; Paul Fried; Andreas Kirsch; David Boehm; Felix Fuhrmann; Daniel Beyer; Johanna Barth; Katja Kirsch; Sara Moench; Brigitte Kuester; Yvonne Grunewald; Annett Roth; Uta Weiss; Dennis Bohm; Katrin Winkel; Sophie Adler; Mike Schweizer; Jens Jager; Torsten Kuhn; Jens Keller; Eric Kuster; Juliane Fassbinder; Sabrina Furst; Monika Kaufmann; Mike Klug; Andrea Moench; Simone Luft; Kerstin Eichelberger; Doreen Koch; Marcel Ebersbach; Dieter Hahn; Alexander Schneider; Michelle Baier; Florian Weber; Lena Duerr; Mike Braun; Kevin Eisenhauer; Maria Schaefer; Anna Frey; Maik Wulf, Germany; Henrik Tess, France; Web Commerce Communications Limited,

Client Care, Whoisprotection.cc, Domain Admin, Malaysia; Name Redacted¹, Norway; Uwe Achen; Eric Koehler; Ming dian, China; and Nataliia Kuripko; Markus Schroder, United States of America (“United States” or “U.S.”).

2. The Domain Names and Registrars

The disputed domain names can be grouped according to their respective registrars for convenience as follows:

The eleven (11) disputed domain names <clarkschoenensale.com>, <clarksclearancestore.com>, <clarksdublinsale.com>, <clarkshoesmexico.com>, <clarksnz.com>, <clarks-romania.com>, <clarksturkiyeonline.co>, <clarkswyprzedaz.com>, <clarksmexico.me>, <desertbootshop.com>, and <sapatosclarksportugal.com> (“the First Registrar Disputed Domain Names”) are registered with 1API GmbH (the “First Registrar”);

The (54) disputed domain names <butyclarks.com>, <clarkscanadasandals.com>, <clarkscanadastores.com>, <clarks-colombia.com>, <clarks-denmark.com>, <clarksenchile.com>, <clarksenligne.com>, <clarksfactoryoutlets.com>, <clarksfactoryshop.com>, <clarks-france.com>, <clarksinireland.com>, <clarksirelandoutlets.com>, <clarksisistanbul.com>, <clarks-jp.com>, <clarkslondonoutlet.com>, <clarksmadridtiendas.com>, <clarksmalaysiaoutlet.com>, <clarks-nederland.com>, <clarksnederlandsale.com>, <clarksnorway.com>, <clarksoutletespana.com>, <clarksoutletromania.com>, <clarksoutletsfactory.com>, <clarksoutletshoes.com>, <clarksoutletsingapore.com>, <clarksph.com>, <clarks-philippines.com>, <clarkspt.com>, <clarkssaleireland.com>, <clarkssaleukoutlet.com>, <clarkssandalen.com>, <clarkssandalsnz.com>, <clarksscarpe.com>, <clarksschoen.com>, <clarksschuhedamen.com>, <clarksshoes-australia.com>, <clarks-shoesgreece.com>, <clarksshoesindonesia.com>, <clarksshoessouthafrica.com>, <clarksshoesusaoutlet.com>, <clarksshoplondon.com>, <clarkssklep.com>, <clarksskodame.com>, <clarksskorrea.com>, <clarks-southafrica.com>, <clarksszandal.com>, <clarksusasale.com>, <clarkswinkel.com>, <clarksza.com>, <clarksonline.com>, <magasinclarksparis.com>, <tiendaclarksmexico.com>, <zapatosclarkshombre.com>, and <zapatosclarksmexico.com> (“the Second Registrar Disputed Domain Names”) are registered with Alibaba.com Singapore E-Commerce Private Limited (the “Second Registrar”).

The two (2) disputed domain names <clarksireland.me> and <clarksturkiyeonline.biz> (“the Third Registrar Disputed Domain Names”) are registered with Dynadot, LLC (the “Third Registrar”).

The two (2) disputed domain names <clarkskøbenhavn.com> [<xn--clarkskbenhavn-wqb.com>] and <clarksskorsverige.com> (“the Fourth Registrar Disputed Domain Names”) are registered with Gransy, s.r.o. d/b/a subreg.cz (“the Fourth Registrar”).

The disputed domain name <clarksingreece.com> (“the Fifth Registrar Disputed Domain Name”) is registered with Hosting Concepts B.V. d/b/a Registrar.eu (“the Fifth Registrar”).

The disputed domain name <clarksaustralia.org> (“the Sixth Registrar Disputed Domain Name”) is registered with Key-Systems GmbH (“the Sixth Registrar”).

¹ Respondents appear to have used the name of a third party when registering the disputed domain names. In light of the potential identity theft, the Panel has redacted the Respondent’s names from this decision. However, the Panel has attached as Annex 1 to this decision an instruction to the Registrars regarding transfer of the disputed domain names, which includes the names of the Respondents. The Panel has authorized the Center to transmit Annex 1 to the Registrars as part of the order in this proceeding, and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#)

The thirty-two (32) disputed domain names <clarksbutypl.com>, <clarkscipelehrvatska.com>, <clarkscipomagyarorszagon.com>, <clarkscz.com>, <clarks-hungary.com>, <clarksinsingapore.com>, <clarksirelandsale.com>, <clarkskonorge.com>, <clarkslojasportugal.com>, <clarksoutletnl.com>, <clarkssaldionline.com>, <clarksshoenz.com>, <clarksxargentina.com>, <clarksxaustralia.com>, <clarksxcanada.com>, <clarksxchile.com>, <clarksxcolombia.com>, <clarksxdanmark.com>, <clarksxde.com>, <clarksxespana.com>, <clarksxfrance.com>, <clarksxgreece.com>, <clarksxromania.com>, <clarksxschweiz.com>, <clarksxsverige.com>, <clarksxuk.com>, <clarksxsouthafrica.com>, <clarksxsrbija.com>, <clarksxsuomi.com>, <clarksxturkiye.com>, <clarksxusa.com>, and <tiendasclarksmexico.com> (“the Seventh Registrar Disputed Domain Names”) are registered with Mat Bao Corporation (“the Seventh Registrar”).

The disputed domain name <clarsk.shop> (“the Eighth Registrar Disputed Domain Name”) is registered with NameCheap, Inc. (“the Eighth Registrar”).

The six (6) disputed domain names <clarcksshoes.me>, <clarksnorge.top>, <clarksonlinenz.top>, <clarksturkiyeonline.top>, <clarksxsk.com>, and <clarks-malaysia.com> (“the Ninth Registrar Disputed Domain Names”) are registered with NameSilo, LLC (“the Ninth Registrar”).

The three (3) disputed domain names <clarksshoesph.com>, <clarkssandalsoutlet.com>, and <clarksamsterdam.com> (“the Tenth Registrar Disputed Domain Names”) are registered with OnlineNic, Inc. (“the Tenth Registrar”).

The two (2) disputed domain names <clarks-budapest.com> and <clarksnz.top> (“the Eleventh Registrar Disputed Domain Names”) are registered with PDR Ltd. d/b/a PublicDomainRegistry.com (“the Eleventh Registrar”).

The three (3) disputed domain names <clarksshoesaustralia.com>, <clarksshoesoutletuk.com>, and <clarksshop-hu.com> (“the Twelfth Registrar Disputed Domain Names”) are registered with NETIM SARL (“the Twelfth Registrar”).

The disputed domain name <desertboots.ro> (“the Thirteenth Registrar Disputed Domain Name”) is registered with ROTLD (“the Thirteenth Registrar”; and collectively with the prior twelve registrars, the “Registrars”).

The 119 disputed domain names were registered by the registrants on the dates and through the corresponding registrars shown in attached Exhibit A are collectively “Disputed Domain Names” and each a “Disputed Domain Name”.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 8, 2022 with respect to 34 Disputed Domain Names. On March 9, 2022, the Center transmitted by emails to the Registrars requests for registrar verification in connection with the Disputed Domain Names. On March 9, 2022, March 10, 2022, and March 14, 2022, the Registrars transmitted by emails to the Center their verification responses disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent and contact information in the Complaint. The Center sent an email communication to Complainant on March 16, 2022, providing the registrant and contact information disclosed by the Registrars, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on March 29, 2022, requesting the addition of 85 Disputed Domain Names for consideration as part of the current proceeding. On April 13, 2022, the Center transmitted by email to the Registrars a request for verification in relation to the newly added Disputed Domain Names. On April 13, 2022, April 14, 2022, and April 18, 2022, the Registrars sent their verification responses to the Center disclosing registrant and contact information for the newly added Disputed Domain Names which differed from the named Respondent and contact information in the amended Complaint. The Center sent

an email communication to Complainant on April 19, 2022, providing the registrant and contact information disclosed by the Registrars, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on April 22, 2022 with respect to the 119 Disputed Domain Names.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondents of the Complaint, and the proceedings commenced on May 2, 2022. In accordance with the Rules, paragraph 5, the due date for Response was May 22, 2022. Respondents did not submit any response. Accordingly, the Center notified Respondents' default on May 25, 2022.

The Center appointed Scott R. Austin as the sole panelist in this matter on June 13, 2022. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

Without contest by Respondents, Complainant asserts in its Complaint as amended and its attached Annexes provide evidence sufficient to support that:

Complainant C & J Clark International Limited is a U.K.-based international shoe manufacturer and retailer which operates in more than 75 countries and distributes its footwear products under the CLARKS trademark (the "CLARKS Mark") through approximately 1,400 branded stores and franchises worldwide. Founded in 1825, Complainant's brand and trade name derive from the family name of its founders, brothers Cyrus and James Clark; and Complainant has developed that brand reputation to become one of the largest and most influential shoe manufacturers in the world.

Complainant has also gained fame as one of the most fashion-forward shoe manufacturers since the early 1950s, creating a line of iconic fashion footwear products including such sub brands as the DESERT BOOT (which first went on sale in 1950), Wallabee, Desert Trek, and more. Complainant has also collaborated with a number of major brands such as Disney and Marvel and gained significant media attention by being featured in publications such as Vogue, GQ, and Esquire. Complainant made a turnover of GBP 755 million in the financial year ending January 30, 2021.

Complainant has acquired widespread consumer goodwill by virtue of its nearly 200 years in operation using the CLARKS Mark. To date, Complainant and its subsidiaries hold registrations for the CLARKS Mark and related sub brands across numerous jurisdictions, including:

United Kingdom Trademark Registration No. UK0000504405A for CLARKS registered on July 11, 1929, for goods in International Class 25;

United States Trademark Registration No. 0691307, CLARKS, registered on January 12, 1960, for "footwear for men, women, and children-namely, boots, shoes, slippers, sandals, overboots, overshoes, and galoshes" in International Class 25 and claiming a first use date of January 1, 1937; and

European Union Trademark Registration No. 000167940, CLARKS, filed on April 1, 1996, registered on July 16, 1998, in International Classes 18, 25 and 26.

United Kingdom Trademark Registration No. UK000002252143, CLARKS DESERT BOOT, registered on April 19, 2022, for goods in International Class 25.

Japan Trademark Registration No. T4736615, DESERT BOOT, filed on June 18, 2022, registered on December 26, 2003.

Complainant and its subsidiaries have registered and maintain many domain names incorporating the CLARKS Mark, both under generic Top Level Domain (“gTLD”) and country code Top Level Domain (“ccTLD”) extensions, including <clarksusa.com> registered on August 25, 2000, <clarkscanada.com> registered on March 19, 2002, <clarks.it> registered June 2, 2000, and <clarks.eu> registered June 22, 2006. These official domain names are used to access official CLARKS Mark websites (the “Official CLARKS Mark Websites”). The Official CLARKS Mark Websites enable Complainant to tailor its footwear product offerings according to the needs of customers based in the different territories it serves with information specific to their location. Complainant also has advertised its trademark and services on social media, most extensively on Facebook.

The First Registrar Disputed Domain Names and Thirteenth Registrar Disputed Domain Name resolve to websites which are, in appearance and structure, substantially similar and, in a number of instances, identical to one another as “copycat” websites that reproduce Complainant’s CLARKS Mark and logo without authorization and falsely purport to offer Complainant’s branded CLARKS Mark footwear and accessories to the general public, including Complainant’s related trademark brands, e.g., DESERT BOOT (the “DESERT BOOT Mark”) to impersonate Complainant (each a “Copycat Website” and collectively “Copycat Websites”), except <clarkshoemexico.com> and <clarksmexico.me> both do not resolve to any active website; rather, they are passively held.

The Second Registrar Disputed Domain Names predominantly resolve to Copycat Websites, except <clarksoutletsfactory.com>, <clarksfactoryshop.com>, <clarksnorway.com>, <clarksoutletespana.com>, <clarks-shoesgreece.com>, <clarksenchile.com>, <clarks-colombia.com>, <clarksmadridtiendas.com>, <butyclarks.com>, <clarksszandal.com>, <zapatosclarksmexico.com>, <clarksskodame.com>, <clarkssandalen.com>, <clarksschuhedamen.com>, <clarkssandalsnz.com>, and <clarkssshoes-australia.com> are all passively held, and <larcksonline.com> which originally resolved to a Copycat Website, now redirects to a website blocked and flagged as a possible phishing site.

The Third Registrar Disputed Domain Names both resolve to Copycat Websites.

The Fourth Registrar Disputed Domain Names both resolve to Copycat Websites.

The Fifth Registrar Disputed Domain Name resolves to a Copycat Website.

The Sixth Registrar Disputed Domain Name resolves to a Copycat Website.

The Seventh Registrar Disputed Domain Names all resolve to Copycat Websites.

The Eighth Registrar Disputed Domain Name resolves to a website used to impersonate a competitor of Complainant that promotes commercial footwear products in competition with Complainant’s products.

The Ninth Registrar Disputed Domain Names all resolve to Copycat Websites, except <clarksonlinenz.top> which is passively held.

The Tenth Registrar Disputed Domain Names all resolve to Copycat Websites.

The Eleventh Registrar Disputed Domain Names both resolve to Copycat Websites.

The Twelfth Registrar Disputed Domain Names all resolve to Copycat Websites.

The Thirteenth Registrar Disputed Domain Name is passively held.

5. Parties' Contentions

A. Complainant

Complainant holds numerous trademark registrations for the CLARKS Mark across many jurisdictions around the world and also has established rights through trademark registrations for the DESERT BOOT Mark. Complainant shows in its Annexes that it owns registered trademark rights as set out in Section 4 above. Complainant further relies on the goodwill and recognition that has been attained under the CLARKS Mark, which has become a distinctive identifier of its products and services. Complainant's CLARKS trademarks are widely recognized by the public.

Previous panels have acknowledged Complainant's rights in and the value of the CLARKS Mark and its association with Complainant, including:

C & J Clark International Limited v. Karen Brand, WIPO Case No. [DCO2015-0035](#).

C. & J. Clark International Ltd v. Super Privacy Service LTD c/o Dynadot, WIPO Case No. [D2020-0641](#).

C. & J. Clark International Ltd v. Gene Bishop, WIPO Case No. [D2019-3028](#).

C. & J. Clark International Ltd v. Domain Administrator, See [PrivacyGuardian.org](#) / Paula Speicher, WIPO Case No. [D2019-2972](#).

C & J Clark International Limited v. Ludwig Rhys, WIPO Case No. [D2017-0260](#).

C & J Clark International Limited v. Friendly Booking – Tran Ngoc Dat, WIPO Case No. [D2015-1274](#).

Complainant asserts that the Disputed Domain Names are confusingly similar to the CLARKS and DESERT BOOT Marks because each of the Disputed Domain Names clearly and prominently encompass Complainant's globally distinctive CLARKS or DESERT BOOT Marks in full, only followed or preceded by descriptive or generic terms.

Although in several of the Disputed Domain Names the CLARKS and DESERT BOOT Mark is misspelled it remains recognizable, and Panels have affirmed that domain names comprised of common, obvious or intentional misspellings of a complainant's mark are considered confusingly similar for the purposes of the first UDRP element. Such variations of Complainant's CLARKS Mark and DESERT BOOT Mark have been selected for their confusing similarity with this term and should not, therefore, prevent a finding of confusing similarity.

Complainant submits that there are no rights or legitimate interests held by any Respondent in respect of the Disputed Domain Names. No Respondent is commonly known by any of the Disputed Domain Names nor does any Respondent have any authorization or license from Complainant to use the CLARKS Mark or the DESERT BOOT Mark or to register any of the Disputed Domain Names.

Complainant contends that the fact that each Disputed Domain Name contains the CLARKS Mark together with country name abbreviations such as "uk", "usa", "jp", "portugal", "london", "mexico" or "romania", or common words for products sold by Complainant such as "shoes", "boots", or "sandals" shows that the aim of Respondent in each case is to confuse Internet users searching for Complainant's products into thinking that they had arrived at Complainant's website and to create a false link between Complainant's CLARKS Mark and each of the Disputed Domain Names. Similarly, with respect the DESERT BOOT Mark, the addition of the term "shop" reflects the aim of the Respondent to confuse Internet users. No Respondent is making a legitimate noncommercial or fair use of any of the Disputed Domain Names. Rather Respondents are using 99 of the 119 Disputed Domain Names to resolve to a website that offers footwear for sale under Complainant's CLARKS Mark, often at discount prices, without permission or consent from Complainant. One of the Disputed Domain Names, <clarsk.shop>, has previously been used to impersonate the commercial offerings of a competing third-party brand. Such use does not amount to a *bona fide* offering of goods and services and can never confer rights or legitimate interests on a respondent, nor can such unauthorized impersonation to sell goods constitute a legitimate noncommercial or fair use of any of the Disputed Domain Names. None of these resolving sites contain disclaimers accounting for their connection (or lack thereof) to Complainant. The remaining 19 Disputed Domain Names have not been actively used by

Respondent. Respondent's non-use of the remaining passively held Disputed Domain Names does not confer it with a legitimate interest.

Complainant contends that the Disputed Domain Names were registered and are being used in bad faith. First, Complainant asserts that the CLARKS Mark is recognized worldwide and therefore Respondents must have been aware that it would be registered as a trademark in various jurisdictions worldwide. Complainant's earliest CLARKS Mark registration also predates the registration of all of the Disputed Domain Names by approximately 90 years. Complainant submits, therefore, that Respondents knowingly registered each of the Disputed Domain Names in bad faith with the intention of targeting Complainant's CLARKS Mark to trade off the goodwill and reputation attaching to Complainant, its CLARKS Mark and DESERT BOOT Mark.

Next, Complainant contends that Respondents' use of the Disputed Domain Names is to capitalize on the reputation of Complainant's trademarks by diverting Internet users seeking Complainant's products to its websites for financial gain, by intentionally creating a likelihood of confusion with Complainant's registered trademarks as to the source, sponsorship, affiliation, or endorsement of its websites and/or the goods offered or promoted through the websites. Complainant contends, therefore that Respondents conduct amounts to registration and use of each of the Disputed Domain Names in bad faith.

Complainant requests that the proceedings for each of the Disputed Domain Names be consolidated on the basis that they are all under common control based on factors relied upon by prior UDRP panels in ruling upon such requests. Complainant's support for these factors is provided in substantial and detailed evidence submitted in the Annexes to its Complaint which are considered in detail by the Panel in Section 6 A below.

B. Respondent

Respondents did not reply to Complainant's contentions. An email was received from a third party claiming the unauthorized use of its information for purposes of the registration of a Disputed Domain Name.

6. Discussion and Findings

In view of Respondents failure to submit any Response, the Panel shall decide this administrative proceeding on the basis of Complainant's undisputed representations pursuant to paragraphs 5(f), 14(a) and 15(a) of the Rules and draw such inferences it considers appropriate pursuant to paragraph 14(b) of the Rules. The Panel is entitled to accept all reasonable allegations and inferences set forth in the Complaint as true unless the evidence is clearly contradictory. See *Talk City, Inc. v. Michael Robertson*, WIPO Case No. [D2000-0009](#) ("In the absence of a response, it is appropriate to accept as true all allegations of the Complaint."); see also *Microsoft Corporation v. Freak Films Oy*, WIPO Case No. [D2003-0109](#).

Where no substantive Response is filed, however, Complainant must still make out its case in all respects under paragraph 4(a) of the Policy. To succeed, Complainant must demonstrate that all the elements listed in paragraph 4(a) of the Policy have been satisfied.

The Panel will address its findings on each of these requirements in more detail below.

The standard of proof under the Policy is often expressed as the "balance of the probabilities" or "preponderance of the evidence" standard. Under this standard, an asserting party needs to establish that it is more likely than not that the claimed fact is true. See, WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.2.

6.1. Consolidation

The Rules contemplate that a panel may consolidate multiple domain name disputes (UDRP Rules, paragraph 10(e)). Where multiple respondents are named, the consensus of prior UDRP panels is to look at the following key considerations: i) whether the domain names or corresponding websites appear to be under common control; ii) whether consolidation would be fair and equitable to all parties; and iii) whether consolidation would promote procedural efficiency. See [WIPO Overview 3.0](#), section 4.11.2.

In this case, Complainant draws upon these factors and based upon supporting evidence shown in the Annexes attached to the Complaint submits that the Disputed Domain Names are subject to common control for the following reasons:

- (i) of the Disputed Domain Names which have been actively used, 100 of the total 119, resolve (or previously resolved) to essentially Copycat Websites which look alike in terms of format and style, are either substantially similar in appearance and structure or identical to each other. All of these sites (except for <clarsk.shop>, which impersonated a third party) feature Complainant's CLARKS Mark, often with its stylized CLARKS logo, and in all cases without authorization, to falsely impersonate Complainant and purport to sell its footwear products under the CLARKS and DESERT BOOT Marks;
- (ii) all 119 of the Disputed Domain Names themselves share a similar format and lexical pattern involving the clearly recognizable CLARKS Mark or DESERT BOOT Mark (or a typosquatting variation of such marks) plus generic, descriptive or geographical terms (such as "sale", "shoes", and "mexico") that make clear reference to Complainant's industry and commercial offerings;
- (iii) many of the Disputed Domain Names are registered through the same Registrar on the same or similar dates within short periods of each other. For instance, 14 of the Disputed Domain Names were registered to the same Respondent on February 25, 2022; 30 more were registered together through another Registrar during December 2021, ostensibly to multiple registrants, but each of these Disputed Domain Names especially show a similar pattern of composition such as Complainant's CLARKS Mark plus the letter 'x' and a country name;
- (iv) all of the Disputed Domain Names can be considered as conforming to one of two categories of registrant: those whose Whois details are united by a particular registrant pattern (65 domain names), and those held by the same controlling registrant (54 domain names). The majority of the Disputed Domain Names fall within the first category, whose registrations are associated with fake, stolen or incomplete postal addresses (e.g., with street names that cannot be found in the applicable town/municipality), many of the registrants supposedly located in Germany, yet these registrant's details also involve email addresses comprising Chinese names/numbers (or a random combination of letters) and end in "[...]@yeah.net" or "[...]@hotmail.com";
- (v) several of the Disputed Domain Names can be clearly tied to each other through a common controller based on hosting identical content, e.g., <clarkschoenensale.com> and <clarksclearancestore.com>;
- (vi) the registrant of the Disputed Domain Name <clarksclearancestore.com> has also been the subject of a previous UDRP panel decision², reflecting a pattern of conduct that is reinforced given the identical nature of the content found at the Disputed Domain Name as compared to other Disputed Domain Names registered under other Respondents (i.e., <clarkschoenensale.com>);
- (vii) many of the Disputed Domain Names show common control through evidence they are connected to one another through the use of the same dedicated servers, such as <clarksturkiyeonline.biz> hosted on the same dedicated server used to host <clarksturkiyeonline.co> whose registrant details fall within the first category of registrants noted in (iv) above, and Complainant shows in evidence submitted to further connect the two categories of registrants described under paragraph (iv) based on their use of the same underlying dedicated hosting server(s), where the same IP address is presently used to host five domain names, four of which are among the Disputed Domain Names of this case and of those four different registrants, three include fake German address details and one is under "Web Commerce Communications Limited", which supports the contention that they have a common controller;

² See, *Puma SE v. Henrik Tess*, WIPO Case No. [D2021-3706](#).

- (viii) more than 20 prior UDRP panel decisions involving consolidations show registrant and common control circumstances similar to those presented here, which Complainant contends clearly reflect the same underlying controller of the Disputed Domain Names in this case. Among these noted similarities, which the Panel admits among the numerous Annex information submitted have been considerably more time consuming than expected to review and confirm, include domain names comprised of Complainant's mark in combination with similar geographical (e.g. "uk" and "mexico") and descriptive (e.g. "shoes" and "sale") terms that relate to Complainant's industry, similar website contents, registrant addresses located in Germany that are false and do not exist in the indicated cities, most registrant email addresses ending in "[...]@yeah.net", and Respondent Web Commerce Communications Limited. See *Molicopi, S.L. v. Michael MEIER, David KUNZE [...]*, WIPO Case No. [D2021-3710](#); *On AG and On Clouds GmbH v. Domain Administrator, See PrivacyGuardian.org/ Mike Kalb*, WIPO Case No. [D2021-4340](#)

Overall, there is a high level of similarity between the format of the Disputed Domain Names, and also between the format and content of the websites to which they resolve (or previously resolved) all using Complainant's marks and products, many originating from similar servers and IP addresses. Coupled with the fact that it appears all of the German individual registrant addresses are obviously false and likely that the various registrant data provided for each registration does not correspond to the actual underlying registrant of the Disputed Domain Names, that many are registered within a relatively short period of each other with the same Registrar and many on the same date or within a few days of each other, and the history of similar operative facts of common controllers in prior consolidation cases cited by Complainant, the Panel finds that it is most likely that the Disputed Domain Names and associated websites are or were under the common control of the same person or persons (hereafter, the "Respondents"). None of Respondents have challenged Complainant's request for consolidation, and it is clearly most procedurally efficient, and considering all the circumstances, fair and equitable for the Disputed Domain Names to be included together in this one case, as opposed to a series of many separately filed complaints.

It is, therefore, appropriate and efficient to determine Complainant's UDRP claims in the same proceeding. In addition, due to the fraudulent registration data apparent here for a large number of individual natural person registrants as Respondents, the Panel is mindful of the possibility of identity theft [and the lack of identity validation/verification under current registration data policies] and has requested, therefore, that the names of certain Respondents who are natural persons be redacted.

6.2. Substantive Issues

A. Identical or Confusingly Similar

Ownership of a nationally registered trademark constitutes *prima facie* evidence that the complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

Complainant claims registered trademark rights in the CLARKS Mark for its footwear related products dating back to 1929 and the DESERT BOOT Mark since 2002. Sufficient evidence has been submitted in the form of electronic copies of valid and subsisting national and international trademark registration documents in the name of Complainant referenced in Section 4 and recognized by prior UDRP panels in the decisions cited in Section 5A. Complainant has demonstrated, therefore, that it has rights in the CLARKS Mark and DESERT BOOT Mark required under the Policy. See *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. [D2014-0657](#).

Further, Complainant has provided a series of citations to prior UDRP decisions which support the recognition of Complainant's trademark rights established in the CLARKS Mark as distinctive and well-known worldwide. See, e.g., *C & J Clark International Limited v. wangsuo qing*, WIPO Case No. [D2019-1898](#); *C & J Clark International Limited v. Friendly Booking – Tran Ngoc Dat*, WIPO Case No. [D2015-1274](#).

Complainant's extensive and detailed evidence submitted in the Annexes relating to each Disputed Domain Name shows that 115 of the 119 Disputed Domain Names clearly and prominently encompass

Complainant's CLARKS Mark or its DESERT BOOT Mark in full, only followed or preceded by additional terms and Complainant contends therefore, that each of the Disputed Domain Names is confusingly similar to Complainant's Marks. With respect the remaining four (4) Disputed Domain Names (*i.e.*, <larcksonline.com>, <clarsk.shop>, <clarskmexico.me>, and <clarcksshoes.me>), the Complainant's CLARKS Mark has been misspelled, but remains recognizable.

Prior UDRP panels have held that a domain name which wholly incorporates a complainant's registered mark is sufficient to establish identity or confusing similarity for purposes of the Policy despite the addition of other terms to such marks. [WIPO Overview 3.0](#), section 1.8 ("Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element") see also *Wal-Mart Stores, Inc. v. MacLeod d/b/a/ For Sale*, WIPO Case No. [D2000-0662](#). Similarly, "a domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element". [WIPO Overview 3.0](#), section 1.9.

Complainant has satisfied paragraph 4(a)(i) of the Policy.

B. Rights or Legitimate Interests

Under the second element of the Policy, a complainant is first required to make out a *prima facie* case that the respondent lacks rights or legitimate interests in the disputed domain name. If a complainant makes that showing, the burden of production on this element shifts to the respondent to come forward with relevant evidence of such rights or legitimate interests in the domain name. If the respondent fails to come forward with such evidence, a complainant is generally deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1. See also, *Malayan Banking Berhad v. Beauty, Success & Truth International*, WIPO Case No. [D2008-1393](#).

Complainant has established, *prima facie*, that Respondents lack rights or legitimate interests in each of the Disputed Domain Names. First, Complainant submits that it has not licensed, or otherwise authorized any of Respondents to use the CLARKS Mark or DESERT BOOT Mark in any manner or to register any of the Disputed Domain Names, nor is Complainant in any way or manner associated with or related to any Respondent. There is no evidence of record that any Respondent has registered as trademarks or used unregistered marks for the terms "clarks" or "desert boot" and Complainant states that to the best of its knowledge, no Respondent has registered any trademarks for "clarks" or "desert boot", nor has Complainant found any evidence to suggest any Respondent holds unregistered rights in such terms.

Complainant also contends and provides persuasive registration data evidence in the Annexes to its Complaint that none of Respondents are commonly known by their respective Disputed Domain Name or any of the Disputed Domain Names. Complainant has also asserted that it is neither in possession of, nor aware of the existence of any evidence demonstrating that any of Respondents might be commonly known by any of the Disputed Domain Names.

It is generally regarded as *prima facie* evidence of no rights or legitimate interests if a complainant shows that the disputed domain name is identical or confusingly similar to a complainant's trademark, that the respondent is not commonly known by the disputed domain name, and that a complainant has not authorized the respondent to use its mark (or an expression which is confusingly similar to its mark), whether in the disputed domain name or otherwise. See [WIPO Overview 3.0](#), section 2.1; see also *Wal-Mart Stores, Inc. v. WalMart Careers, Inc.*, WIPO Case No. [D2012-0285](#); *Roust Trading Limited v. AMG LLC*, WIPO Case No. [D2007-1857](#).

Complainant next contends that each Respondent lacks rights or legitimate interests in their respective Disputed Domain Name because each Disputed Domain Name is either actively used to impersonate Complainant to divert Complainant's potential customers to the respective Respondent's website for its commercial gain or is passively held and such non-use under the circumstance here cannot be sustained as

legitimate use (with the exception of <clarsk.shop>).

As discussed under Section 6.1, Complainant has shown in the evidence submitted that of the Disputed Domain Names which have been actively used, 100 of the total 119, (except one for <clarsk.shop>) resolve to essentially Copycat Websites which look alike in terms of format and style, are either substantially similar in appearance and structure or identical to each other. All of these active sites feature Complainant's CLARKS Mark or DESERT BOOT Mark, often with its stylized CLARKS logo, and in all cases without authorization, to falsely impersonate Complainant and purport to sell its footwear products under the CLARKS Mark. The one exception, a Disputed Domain Name featuring the intentionally misspelled CLARKS Mark <clarsk.shop>, has previously been used to impersonate the services of a third party footwear brand that is in competition with Complainant. The 19 remaining Disputed Domain Names have not been used by the respective Respondents, are inactive for website purposes, and as such are considered passively held by each Respondent.

Each of the 99 Disputed Domain Names that directed potential customers of Complainant to their active Copycat Websites did so by constructing domain names consisting of Complainant's CLARKS Mark or DESERT BOOT Mark along with geographic and descriptive terms associated with Complainant's industry or potential retail location, thereby creating a risk of implied affiliation confusing Internet users searching for Complainant's products into thinking that they had arrived at Complainant's official website. Moreover, such risk of implied affiliation was exacerbated by the impersonating nature of the content reflected at these websites, none of which provided any clarifying information as to its relation (or lack thereof) to the Complainant. While prior panels have assessed the rights of distributors or resellers, the Respondents here do not meet the applicable safeguards listed in section 2.8 of the [WIPO Overview 3.0](#).

Prior UDRP panels have held that the use of a domain name like the 99 Disputed Domain Names here, attempting to attract Internet users through misuse of a well-known trademark, and the provision of content which promote goods and services impersonating and competitive to the complainant cannot be considered use in connection with a *bona fide* offering of goods or services under Paragraph 4(c)(i). See *The Clorox Company v. WhoisGuard Protected, WhoisGuard, Inc. / Enos Villanueva, Melissa Rosenberg, Yang Ming*, WIPO Case No. [D2021-0603](#).

Prior UDRP panels have also held that the use of a domain name for illegal activity involving impersonation and fraud (e.g., phishing, unauthorized account access/hacking, impersonation/passing off, or other types of fraud) can never confer rights or legitimate interests on a respondent. Considering the lack of disclaiming information, the use of a third party's contact information for registration of a Disputed Domain Name, and the potential counterfeit nature of the goods sold at the Disputed Domain Names, the Panel finds that the use of the Disputed Domain Names falls within this scope of illegal activity. See, [WIPO Overview 3.0](#), section 2.13. See also, *Springer Nature Limited v. Registration Private, Domains By Proxy, LLC / Collections Springer Nature*, WIPO Case No. [D2020-0955](#).

Similarly, considering the use of the remaining Disputed Domain Name resolving to an active website offering a third party's competing products, <clarsk.shop>, UDRP panels have repeatedly found a respondent's use of a confusingly similar domain name for commercial gain cannot establish rights or legitimate interests. See [WIPO Overview 3.0](#), section 2.5.3.

By using Complainant's CLARKS Mark and DESERT BOOT Mark as the dominant portion of its Disputed Domain Name, each Respondent operating a Copycat Website is falsely suggesting they are the trademark owner, or the website is the official site for the products sold by Complainant or one of Complainant's affiliates when it is not. After reviewing the 100 Copycat Websites operating from the Disputed Domain Names, there is clearly no legitimate noncommercial or fair use on the part of any Respondent using its Disputed Domain Name for such websites. See *Houghton Mifflin Co. v. The Weathermen, Inc.*, WIPO Case No. [D2001-0211](#).

As for the remaining 19 Respondents with inactive websites, their non-use of the passively held Disputed Domain Names also does not confer each rights or legitimate interests under paragraph 4(c)(iii).

Considering the circumstances of this case, where no content is displayed on the websites to which the Disputed Domain Names resolve, such non-use can neither be considered a *bona fide* offering of goods or services nor a legitimate noncommercial or fair use. Moreover, as stated above, considering the composition of the Disputed Domain Names, consisting of the Complainant's CLARKS Mark of DESERT BOOTS Mark, or typographical variations thereof, the intent of the Respondent to confuse users via its registration of the Domain Names cannot constitute fair use.

Complainant has presented a strong *prima facie* case indicating that Respondents do not have any rights or legitimate interests in the Disputed Domain Names. The Panel notes that no Respondent has submitted a Response in this proceeding, much less provided the Panel with any evidence set forth in paragraph 4(c) of the Policy from which the Panel might conclude a respondent has rights or legitimate interests in their respective disputed domain name. As such, Respondents have failed to rebut Complainant's strong *prima facie* case.

The Panel finds, therefore, that Complainant has successfully met its burden and that the Complaint succeeds under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

The Panel finds that each of Respondents actions constitute bad faith registration and use of their respective Disputed Domain Names.

Under this third element of the Policy, Complainant first contends that that because each Respondent has created a Disputed Domain Name that is confusingly similar to Complainant's CLARKS Mark or DESERT BOOT Mark, it is implausible to believe that each Respondent was not aware of Complainant's widely known Marks when each registered its confusingly similar domain name. This likelihood of awareness is especially true where Complainant's earliest CLARKS Mark registration predates the registration of all of the Disputed Domain Names by approximately 90 years. Complainant has also marketed its DESERT BOOT line since the 1950s and has trademarks for this which also long predate the earliest registration date among all the Disputed Domain Names of May 20, 2019, for <desertboots.ro>.

Complainant's CLARKS Mark is also registered all over the world, most likely including a nation where each Respondent is located which influenced their selection of geographic terms to append to Complainant's Marks when registering their Disputed Domain Name, as well as providing personal knowledge of locations where Complainant's globally recognized footwear products are sold. UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a widely known trademark by an unaffiliated entity can by itself create a presumption of bad faith registration and use. See, [WIPO Overview 3.0](#), section 3.1.4.

Based on the foregoing and Respondents choice of descriptive terms (such as "store", "outlet", and "online") in the Disputed Domain Names identifying Complainant's commercial offerings and geographical indicators, pointing to different territories where Complainant sells its CLARKS Mark footwear, the Panel finds that each of Respondents targeted Complainant through their choice of terms to encompass Complainant's well-known Marks as well as the use of typographical variations of the Marks to confuse consumers and concludes that each of the Disputed Domain Names was registered in bad faith. See *LinkedIn Corporation v. Registration Private, Domains By Proxy, LLC / Sathishkumar Varatharajan, Kudo Metrics*, WIPO Case No. [D2018-1807](#); see also *Balenciaga v. liu zhixian, zhixian liu*, WIPO Case No. [D2010-1831](#). Targeting has been recognized by prior UDRP panels in similar recent cases involving Complainant's Marks as the basis for a finding of bad faith registration and use under the Policy. See *C & J Clark International Limited v. wangsu qing*, *supra*.

Bad faith use is also clear from Respondents illegitimate conduct as discussed in detail in section 6.B. Complainant also has shown that 100 of the Disputed Domain Names operated by Respondents resolve to active Copycat Websites which reproduce Complainant's registered and incontestable CLARKS Mark as well as its stylized logo mark, as well as images copied from Complainant's main website that promotes or sells

the same or similar footwear or leather products as those available on Complainant's official website, or in one case impersonates a website in competition with Complainant. It appears to the Panel that these Respondents (or the person or entity in common control of them) have used their respective Disputed Domain Names to intentionally attract, for commercial gain, Internet users to their website by creating a likelihood of confusion with Complainant's Marks as to the source, sponsorship, affiliation, or endorsement of that Respondent's website which the Panel finds constitutes bad faith registration and use under paragraph 4(b)(iv) of the Policy. See *C. & J. Clark International Ltd v. Super Privacy Service LTD c/o Dynadot*, WIPO Case No. [D2020-0641](#). Given the circumstances of this case, such a showing is sufficient to establish bad faith registration and use. See, [WIPO Overview 3.0](#), section 3.3. See also *Royal Bank of Canada v. China Capital Investment Limited*, WIPO Case No. [D2017-1025](#).

Complainant also submits Respondents use of the Disputed Domain Names clearly for impersonation of Complainant's offerings represents *per se* illegitimate activity that is manifestly considered evidence of bad faith. See [WIPO Overview 3.0](#), section 3.1.4. See *MasterCard International Incorporated v. North Tustin Dental Associates*, WIPO Case No. [D2007-1412](#).

Complainant also submits that the 19 Disputed Domain Names of which Complainant has not seen any prior use are nonetheless being "used" in bad faith under the principle of passive holding. See *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#); [WIPO Overview 3.0](#), section 3.3. It is the consensus of UDRP Panels that the key points in determining bad faith use under the passive holding doctrine include: (i) the degree of distinctiveness or reputation of the complainant's mark, (ii) the failure of the respondent to submit a response or to provide any evidence of actual or contemplated good-faith use, (iii) the respondent's concealing its identity or use of false contact details (noted to be in breach of its registration agreement), and (iv) the implausibility of any good faith use to which the domain name may be put. [WIPO Overview 3.0](#), *supra*.

Based on factors already explored in depth, the Panel finds the 19 Disputed Domain Names which are passively held do not prevent a finding of bad faith use, considering: (1) the world renown and well-recognized nature of the distinctive CLARKS Mark for footwear; (2) that none of the Respondents have submitted any response, nor any evidence of actual or contemplated good faith use; (3) the Whois registration data for each of Respondents indicates the majority of Respondents' postal addresses to be in Germany, though a majority are incomplete and in at least one instance features the contact information from a third party without authorization. Further, the street addresses provided to the Registrars for many of the Disputed Domain Names which the Panel has personally searched, do not appear to exist in the cities in Germany provided. In light of Respondent's failure to respond, the Panel concludes that the Whois registration data information submitted by each Respondent is likely intentionally incorrect or false. Providing false Whois information is indicative of bad faith registration and use, see *Mrs. Eva Padberg v. Eurobox Ltd.*, WIPO Case No. [D2007-1886](#); see also *Forte Communications, Inc. v. Service for Life*, WIPO Case No. [D2004-0613](#). The Panel concludes that the passively held domain names cannot plausibly be used by Respondent in good faith. Prior UDRP panels have repeatedly made this finding based on a complainant's Mark's distinctiveness and reputation. See *Cloudflare, Inc. v. Anson Network Limited*, WIPO Case No. [D2019-2435](#).

Accordingly, the Panel finds that the Disputed Domain Names have been both registered and used in bad faith, and that the Complaint has met its burden under paragraph 4(a)(iii) of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the Disputed Domain Names;

<butyclarks.com>, <clarcksshoes.me>, <clarksamsterdam.com>, <clarksaustralia.org>, <clarks-budapest.com>, <clarksbutypl.com>, <clarkscanadasandals.com>, <clarkscanadastores.com>, <clarkschoenensale.com>, <clarkscipelehrvatska.com>, <clarkscipomagyarorszagon.com>,

<clarksclearancestore.com>, <clarks-colombia.com>, <clarkscz.com>, <clarks-denmark.com>, <clarksdublinsale.com>, <clarksenchile.com>, <clarksenligne.com>, <clarksfactoryoutlets.com>, <clarksfactoryshop.com>, <clarks-france.com>, <clarkshoesmexico.com>, <clarks-hungary.com>, <clarksingreece.com>, <clarksinireland.com>, <clarksinsingapore.com>, <clarksireland.me>, <clarksirelandoutlets.com>, <clarksirelandsale.com>, <clarksistanbul.com>, <clarks-jp.com>, <clarkskøbenhavn.com> [<xn--clarkskbenhavn-wqb.com>], <clarkskonorge.com>, <clarkslojasportugal.com>, <clarkslondonoutlet.com>, <clarksmadridtiendas.com>, <clarks-malaysia.com>, <clarksmalaysiaoutlet.com>, <clarks-nederland.com>, <clarksnederlandsale.com>, <clarksnorge.top>, <clarksnorway.com>, <clarksnz.com>, <clarksnz.top>, <clarksonlinenz.top>, <clarksoutletespana.com>, <clarksoutletnl.com>, <clarksoutletromania.com>, <clarksoutletsfactory.com>, <clarksoutletshoes.com>, <clarksoutletsingapore.com>, <clarksph.com>, <clarks-philippines.com>, <clarkspt.com>, <clarks-romania.com>, <clarkssaldionline.com>, <clarkssaleireland.com>, <clarkssaleukoutlet.com>, <clarkssandalen.com>, <clarkssandalsnz.com>, <clarkssandalsoutlet.com>, <clarksscarpe.com>, <clarksschoen.com>, <clarksschuhedamen.com>, <clarksshoenz.com>, <clarksshoes-australia.com>, <clarksshoesaustralia.com>, <clarks-shoesgreece.com>, <clarksshoesindonesia.com>, <clarksshoesoutletuk.com>, <clarksshoesph.com>, <clarksshoessouthafrica.com>, <clarksshoesusaoutlet.com>, <clarksshop-hu.com>, <clarksshoplondon.com>, <clarkssklep.com>, <clarksskodame.com>, <clarksskorrea.com>, <clarksskorsverige.com>, <clarks-southafrica.com>, <clarksszandal.com>, <clarksturkiyeonline.biz>, <clarksturkiyeonline.co>, <clarksturkiyeonline.top>, <clarksusasale.com>, <clarkswinkel.com>, <clarkswyprzedaz.com>, <clarksxargentina.com>, <clarksxaustralia.com>, <clarksxcanada.com>, <clarksxchile.com>, <clarksxcolombia.com>, <clarksxdenmark.com>, <clarksxde.com>, <clarksxespana.com>, <clarksxfrance.com>, <clarksxgreece.com>, <clarksxromania.com>, <clarksxschweiz.com>, <clarksxsk.com>, <clarkxssouthafrica.com>, <clarkxsrbija.com>, <clarkxssuomi.com>, <clarkxssverige.com>, <clarkxsturkiye.com>, <clarksxuk.com>, <clarksxusa.com>, <clarksza.com>, <clarksmexico.me>, <clarksk.shop>, <desertbootshop.com>, <desertboots.ro>, <larcksonline.com>, <magasinclarksparis.com>, <sapatosclarksportugal.com>, <tiendaclarksmexico.com>, <tiendasclarksmexico.com>, <zapatosclarkshombre.com>, and <zapatosclarksmexico.com> be transferred to Complainant.

/Scott R. Austin/

Scott R. Austin

Sole Panelist

Date: July 30, 2022

Disputed Domain Names		Registration Dates	Registrars	Registrants
1.	<clarksdublinesale.com>	21 July 2020	1API GmbH	Drescher Karin
2.	<clarkshoesmexico.com>	25 September 2020	1API GmbH	Schulze Stefanie
3.	<clarcksshoes.me>	28 October 2021	NameSilo, LLC	Steffen Schuster
4.	<desertboots.ro>	25 May 2019	ROTLD	Andreas Kirsch
5.	<clarksaustralia.org>	11 January 2021	Key-Systems GmbH	Manuela Ziegler
6.	<clarks-budapest.com>	15 February 2020	PDR Ltd. d/b/a PublicDomainRegistry.com	Lea Muench
7.	<clarkschoenensale.com>	8 July 2020	1API GmbH	Hoffmann Florian
8.	<clarksclearancestore.com>	4 June 2021	1API GmbH	Henrik Tess
9.	<clarksenligne.com>	29 October 2021	Alibaba.com Singapore E- Commerce Private Limited	Web Commerce Communications Limited Client Care
10.	<clarksingreece.com>	12 July 2021	Hosting Concepts B.V. d/b/a Registrar.eu	Matilda Allen
11.	<clarksinireland.com>	15 September 2021	Alibaba.com Singapore E- Commerce Private Limited	Web Commerce Communications Limited Client Care
12.	<clarksireland.me>	10 April 2021	Dynadot LLC	ming dian
13.	<clarksnorge.top>	25 April 2021	NameSilo, LLC	Uwe Achen
14.	<clarksnz.com>	11 September 2020	1API GmbH	Wulf Susanne
15.	<clarksnz.top>	3 February 2021	PDR Ltd. d/b/a PublicDomainRegistry.com	Christina Kuster
16.	<clarksonlinenz.top>	27 May 2021	NameSilo, LLC	Sven Eisenhauer
17.	<clarksoutletromania.com>	16 June 2021	Alibaba.com Singapore E- Commerce Private Limited	Web Commerce Communications Limited Client Care
18.	<clarksoutletshoes.com>	18 May 2021	Alibaba.com Singapore E- Commerce Private Limited	Whoisprotection.cc, Domain Admin Wilayah Persekutuan
19.	<clarks-romania.com>	18 August 2020	1API GmbH	Fischer Thorsten
20.	<desertbootshop.com>	20 June 2020	1API GmbH	Baier Johanna
21.	<clarksshoesauralia.com>	18 May 2021	NETIM SARL	Torsten Grunewald
22.	<clarksshoesoutletuk.com>	8 May 2021	NETIM SARL	Gabriele Ackerman
23.	<clarksshop-hu.com>	13 January 2021	NETIM SARL	Name Redacted
24.	<clarkssklep.com>	10 September 2021	Alibaba.com Singapore E- Commerce Private Limited	Web Commerce Communications Limited Client Care
25.	<clarksskorsverige.com>	21 January 2021	Gransy, s.r.o.	Paul Fried

26.	<clarksturkiyeonline.biz>	15 December 2021	Dynadot LLC	ming dian
27.	<clarksturkiyeonline.co>	13 October 2021	1API GmbH	Benjamin Vogt
28.	<clarksturkiyeonline.top>	8 May 2021	NameSilo, LLC	Eric Koehler
29.	<clarkswyprzedaz.com>	10 September 2020	1API GmbH	Baer Barbara
30.	<clarsk.shop>	12 November 2021	NameCheap, Inc.	Nataliia Kuripko
31.	<clarskmexico.me>	29 November 2021	1API GmbH	Stephanie Werfel
32.	<larcksonline.com>	13 August 2021	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited Client Care
33.	<sapatosclarksportugal.com>	11 October 2020	1API GmbH	David Bader
34.	<tiendaclarksmexico.com>	4 December 2021	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited Client Care
35.	<clarksxuk.com>	21 December 2021	MAT BAO CORPORATION	Alexander Schneider
36.	<clarkscz.com>	1 December 2021	MAT BAO CORPORATION	Uta Weiss
37.	<clarksxaustralia.com>	1 December 2021	MAT BAO CORPORATION	Brigitte Kuester
38.	<clarksxcanada.com>	1 December 2021	MAT BAO CORPORATION	Yvonne Grunewald
39.	<clarksxdanmark.com>	1 December 2021	MAT BAO CORPORATION	Katrin Winkel
40.	<clarksxde.com>	1 December 2021	MAT BAO CORPORATION	Dennis Bohm
41.	<clarksxespana.com>	1 December 2021	MAT BAO CORPORATION	Sophie Adler
42.	<clarksxfrance.com>	1 December 2021	MAT BAO CORPORATION	Mike Schweizer
43.	<clarksxgreece.com>	1 December 2021	MAT BAO CORPORATION	Jens Jager
44.	<clarksxschweiz.com>	1 December 2021	MAT BAO CORPORATION	Annett Ro
45.	<clarksbuypol.com>	15 December 2021	MAT BAO CORPORATION	Mike Klug
46.	<clarkscipelehrvatska.com>	15 December 2021	MAT BAO CORPORATION	Kerin Eichelberger
47.	<clarkscipomagyarorszagon.com>	15 December 2021	MAT BAO CORPORATION	Torsten Kuhn
48.	<clarksin singapore.com>	15 December 2021	MAT BAO CORPORATION	Simone Luft
49.	<clarksiirelandsale.com>	15 December 2021	MAT BAO CORPORATION	Jens Keller
50.	<clarkskonorge.com>	15 December 2021	MAT BAO CORPORATION	Sabrina Furst
51.	<clarkslojasportugal.com>	15 December 2021	MAT BAO CORPORATION	Andrea Moench
52.	<clarkssoutletnl.com>	15 December 2021	MAT BAO CORPORATION	Juliane Fassbinder
53.	<clarkssaldionline.com>	15 December 2021	MAT BAO CORPORATION	Eric Kuster
54.	<clarkssshoenz.com>	15 December 2021	MAT BAO CORPORATION	Monika Kaufmann
55.	<clarksxromania.com>	15 December 2021	MAT BAO CORPORATION	Marcel Ebersbach
56.	<clarksxsverige.com>	15 December 2021	MAT BAO CORPORATION	Dieter Hahn

57.	<tiendasclarksmexico.com>	15 December 2021	MAT BAO CORPORATION	Doreen Koch
58.	<clarksxargentina.com>	21 December 2021	MAT BAO CORPORATION	Florian Weber
59.	<clarksxchile.com>	21 December 2021	MAT BAO CORPORATION	Michelle Baier
60.	<clarksxcolombia.com>	21 December 2021	MAT BAO CORPORATION	Lena Duerr
61.	<clarksxsk.com>	21 December 2021	NameSilo, LLC	Felix Fuhrmann
62.	<clarkxsouafrica.com>	21 December 2021	MAT BAO CORPORATION	Anna Frey
63.	<clarkxsrbija.com>	21 December 2021	MAT BAO CORPORATION	Maik Wulf
64.	<clarksxturkiye.com>	21 December 2021	MAT BAO CORPORATION	Kevin Eisenhauer
65.	<clarksxusa.com>	21 December 2021	MAT BAO CORPORATION	Maria Schaefer
66.	<clarkxsuomi.com>	1 December 2021	MAT BAO CORPORATION	Mike Braun
67.	<clarksnederlandsale.com>	19 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
68.	<clarkscanadastores.com>	19 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
69.	<clarkssaleukoutlet.com>	18 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
70.	<clarksfactoryoutlets.com>	18 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
71.	<clarksirelandoutlets.com>	18 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
72.	<clarksshoplondon.com>	17 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
73.	<clarksoutletsfactory.com>	17 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
74.	<clarksfactoryshop.com>	17 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
75.	<clarksnorway.com>	16 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
76.	<clarksoutletespana.com>	8 March 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
77.	<clarks-shoesgreece.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
78.	<clarksenchile.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
79.	<clarks-colombia.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
80.	<clarksmadridtiendas.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
81.	<clarkswinkel.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited

82.	<butyclarks.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
83.	<clarksszandal.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
84.	<clarks-jp.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
85.	<clarkspt.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
86.	<clarksskorrea.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
87.	<zapatosclarksmexico.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
88.	<zapatosclarkshombre.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
89.	<clarksskodame.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
90.	<clarksistanbul.com>	25 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
91.	<clarksscarpe.com>	23 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
92.	<clarksschoen.com>	23 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
93.	<magasinclarksparis.com>	22 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
94.	<clarkssandalen.com>	22 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
95.	<clarksschuhedamen.com>	22 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
96.	<clarkssandalsnz.com>	21 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
97.	<clarkssaleireland.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
98.	<clarksshoes-australia.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
99.	<clarksusasale.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
100.	<clarksshoesindonesia.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
101.	<clarksoutletsingapore.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
102.	<clarkslondonoutlet.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited

103.	<clarkscanadasandals.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
104.	<clarksmalaysiaoutlet.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
105.	<clarksph.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
106.	<clarksza.com>	18 February 2022	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
107.	<clarksshoesph.com>	19 March 2022	OnlineNIC, Inc.	Katja Kirsch
108.	<xn--clarkskbenhavn-wqb.com>	19 March 2022	Gransy, s.r.o.	David Boehm
109.	<clarks-denmark.com>	20 July 2021	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
110.	<clarks-hungary.com>	20 July 2021	MAT BAO CORPORATION	Sara Moench
111.	<clarks-philippines.com>	7 July 2021	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
112.	<clarks-malaysia.com>	7 July 2021	NameSilo, LLC	Markus Schroder
113.	<clarks-souafrica.com>	7 July 2021	Alibaba.com Singapore E-Commerce Private Limited	Web Commerce Communications Limited
114.	<clarkssandalsoutlet.com>	19 March 2022	OnlineNIC, Inc.	Johanna Bar
115.	<clarksshoessouafrica.com>	5 January 2022	ALIBABA.COM SINGAPORE E-COMMERCE PRIVATE LIMITED	Web Commerce Communications Limited
116.	<clarksshoesusaoutlet.com>	9 July 2021	ALIBABA.COM SINGAPORE E-COMMERCE PRIVATE LIMITED	Web Commerce Communications Limited
117.	<clarksamsterdam.com>	19 March 2022	OnlineNIC, Inc.	Daniel Beyer
118.	<clarks-france.com>	23 December 2021	ALIBABA.COM SINGAPORE E-COMMERCE PRIVATE LIMITED	Web Commerce Communications Limited
119.	<clarks-nederland.com>	17 July 2021	ALIBABA.COM SINGAPORE E-COMMERCE PRIVATE LIMITED	Web Commerce Communications Limited