

ADMINISTRATIVE PANEL DECISION

Société Anonyme des Galeries Lafayette v. Wang Huadong, huadong wang, huadongwang, 王华东
Case No. D2025-0802

1. The Parties

The Complainant is Société Anonyme des Galeries Lafayette, France, represented by Dreyfus & associés, France.

The Respondents are Wang Huadong, China ("Alias 1"), huadong wang, huadongwang, Hong Kong, China ("Alias 2") and 王华东, China ("Alias 3").

2. The Domain Names and Registrars

The disputed domain names <galerieslafayeettee.top>, <galerieslafayetteee.top>, <galerieslafayetteesp.top>, <galerieslafayetteess.top>, <galerieslafayetteest.top>, <galerieslafayettee.top> and <galerieslafayettess.top> are registered with Domain International Services Limited ("Registrar A").

The disputed domain name <galerieslafayettee.com> is registered with Key-Systems GmbH ("Registrar B").

The disputed domain names <galerieslafayettees.top> and <galerieslafayetttee.top> are registered with Eranet International Limited ("Registrar C").

(Registrars A, B and C are rereferred to individually and collectively as the "Registrar").

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the "Center") on February 26, 2025. On February 26, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 27, 2025, Registrar A transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names <galerieslafayeettee.top>, <galerieslafayetteee.top>, <galerieslafayetteesp.top>, <galerieslafayetteess.top>, <galerieslafayetteest.top>, <galerieslafayettee.top> and <galerieslafayettess.top> which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint. On February 28, 2025, Registrar B transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name <galerieslafayettee.com> which differed from the named Respondent (REDACTED FOR PRIVACY) and

contact information in the Complaint. On March 7, 2025, Registrar C transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names <galerieslafayettees.top> and <galerieslafayetttee.top> which differed from the named Respondent (REDACTED FOR PRIVACY/wanghuadong) and contact information in the Complaint.

The Center sent an email communication to the Complainant on March 10, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint in English on March 12, 2025.

On March 10, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain names registered with Registrar A is Chinese. On March 10, 2025, the Complainant confirmed its request that English be the language of the proceeding. The Respondent did not submit any comment on the Complainant's submission.

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 the Respondent in English and Chinese of the Complaint, and the proceedings commenced on March 14, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 3, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 4, 2025.

The Center appointed Karen Fong as the sole panelist in this matter on April 10, 2025. 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

The Complainant, which is headquartered in France, operates in the fashion retail industry. The Complainant has department stores in France and internationally and receives more than 60 million visitors every day in its 290 stores and e-commerce websites. The Complainant has built up international recognition of its brands, including: Galeries Lafayette, BHV/MARAIS, La Redoute, Galeries Lafayette-Royal Quartz Paris, Louis Pion, Guérin Joaillerie and BazarChic. The Complainant has nearly 14,000 employees, and is present in Germany, China, Indonesia, United Arab Emirates, Türkiye, Qatar and Luxembourg. The Complainant's main website is at "www.galerieslafayette.com".

The Complainant owns worldwide trade mark registrations for the mark GALERIES LAFAYETTE including the following:

- International Trade Mark Registration No. 1523937 for GALERIES LAFAYETTE (Stylised), registered on January 10, 2020, designating, inter alia, China;
- International Trade Mark Registration No. 1291058 for GALERIES LAFAYETTE (Stylised), registered on December 23, 2015, designating, inter alia, China; and
- European Union Trade Mark Registration No. 003798147 for GALERIES LAFAYETTE, registered on May 19, 2006.

(individually and collectively the "Trade Mark").

Prior to the filing of the Complaint, the Complainant contacted the Registrar of the disputed domain names and succeeded in blocking all the disputed domain names so that they are all currently inactive. The disputed domain names (the “Domain Names”) and the websites they resolved to (the “Websites”) prior to the blocking are set out below:

No.	Domain Name	Creation Date	Registrant Alias No.	Registrar No.	Websites and Comments
1	<galerieslafayeettee.top>	February 4, 2025	Alias 1	A	Redirected users to an error page “Connection timed out-Error code 522”.
2	<galerieslafayetteee.top>	January 29, 2025	Alias 1	A	Resolved to an e-commerce website offering various products for sale, The Website bears the Trade Mark and displayed at the Website footer, the address of the Complainant’s flagship store and corporate headquarters.
3	<galerieslafayetteesp.top>	January 3, 2025	Alias 1	A	Redirected to a page displaying a blocking message which prevented users from accessing the Website.
4	<galerieslafayetteess.top>	December 29, 2024	Alias 1	A	Resolved to an e-commerce website offering various products for sale, The Website bears the Trade Mark and displayed at the Website footer, the address of the Complainant’s flagship store and corporate headquarters.
5	<galerieslafayetteest.top>	January 16, 2025	Alias 1	A	Redirected to a page displaying a blocking message which prevented users from accessing the Website.
6	<galerieslafayettee.top>	November 27, 2024	Alias 1	A	No evidence submitted.
7	<galerieslafayettess.top>	January 3, 2025	Alias 1	A	Redirected to a page displaying a blocking message which prevented users from accessing the Website.
8	<galerieslafayettee.com>	November 27, 2024	Alias 2	B	Resolved to an e-commerce website offering

					various products for sale, The Website bears the Trade Mark and displayed at the Website footer, the address of the Complainant's flagship store and corporate headquarters.
9	<galerieslafayettees.top>	December 6, 2024	Alias 3	C	Resolved to an e-commerce website offering various products for sale, The Website bears the Trade Mark and displayed at the Website footer, the address of the Complainant's flagship store and corporate headquarters.
10	<galerieslafayetttee.top>	January 25, 2025	Alias 3	C	Redirected to a page displaying a blocking message which prevented users from accessing the Website.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Names.

Notably, the Complainant contends that the Domain Names are identical and/or confusingly similar to the Trade Mark in which it has rights, that the Respondents have no rights or legitimate interests with respect to the Domain Names, and that the Domain Names were registered and are being used in bad faith. The Complainant requests transfer of the Domain Names.

B. Respondents

The Respondents did not reply to the Complainant's contentions.

6. Discussion and Findings

6.1. Preliminary Issues

A. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the Domain Name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple Domain Name registrants pursuant to paragraph 10(e) of the Rules.

The Domain Name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the Domain Names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes the following:

- (1) All the Domain Names comprise a misspelling of the Trade Mark as part of the Domain Names;
- (2) All the Domain Names were registered through the Registrar between November 27, 2024 and February 4, 2025;
- (3) The email addresses of all the Respondents are identical;
- (4) Domain Names No. 2, 4, 8, and 9 all previously resolved to Websites which reproduced the Complainant's Trade Mark without authorisation and display at the Websites footer, the address of the Complainant's flagship store and corporate headquarters. Domain Names No. 2 and 4 are registered by Respondent Alias 1, Domain Name No. 8 is registered by Respondent Alias 2 and Domain Name No. 9 is registered by Respondent Alias 3.
- (5) The Respondents failed to file responses.

The evidence submitted points to the fact that all the Domain Names are subject of common control by the Respondents. The above pattern evidences common conduct based on the registration and use of the Domain Names and that such conduct interferes with the Trade Mark. The Respondents had the opportunity but did not respond to the Complaint. As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Domain Name registrants (referred to below as "the Respondent") in a single proceeding.

B. Language of the Proceeding

The language of the Registration Agreement for Domain Names No. 1-7 registered with Registrar A is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requested that the language of the proceeding be English. It is noted that the content of some of the Websites connected to some of the Domain Names registered with Registrar A is in English. Given that the language of the Registration Agreements for the other three Domain Names is English and the all the Domain Names are under the common control of the Respondent, this is a clear indication that the Respondent is familiar and understands the English language.

The Respondent has not challenged the Complainant's language request and in fact has failed to file a response in either English or Chinese.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs (see [WIPO Overview 3.0](#), section 4.5.1).

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

6.2 Substantive Issues

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trade mark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Domain Names all consists of a misspelling of the Trade Mark with the dominant elements of the Trade Mark "GALERIES LAFAY" reproduced within the Domain Names followed by adding extra letters or group of letters "e", "t", "s", "sp" and "st" to the last syllable of the Trade Mark "ETTE". Common, obvious, or intentional misspellings of a trade mark are considered by panels to be confusingly similar to the relevant mark for the purposes of the first element. [WIPO Overview 3.0](#), section 1.9 The Panel finds the Trade Mark is recognizable within the Domain Names.

Based on the available record, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which the Respondent may demonstrate rights or legitimate interests in a disputed domain name.

While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible task of "proving a negative", requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Names. The Respondent has not rebutted the Complainant's prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the Domain Names such as those enumerated in the Policy or otherwise. Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular but without limitation, that if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

In the present case, the Panel notes that the Respondent must have been aware of the Trade Mark when it registered the Domain Names given the reputation of the Trade Mark. It is therefore implausible that the Respondent was unaware of the Complainant when it registered the Domain Names.

In the [WIPO Overview 3.0](#), section 3.2.2 states as follows:

“Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant’s mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant’s mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent’s claim not to have been aware of the complainant’s mark.”

The fact that there is a clear absence of rights or legitimate interests coupled with the Respondent’s choice of the 10 Domain Names without any explanation is also a significant factor to consider (as stated in [WIPO Overview 3.0](#), section 3.2.1). The Domain Names fall into the category stated above and the Panel finds that the registration is in bad faith.

The Domain Names are also being used in bad faith. The unauthorised use of the Complainant’s Trade Mark and use of the Complainant’s address on some of the Websites without authorisation are calculated to mislead Internet users to believe its affiliation with the Complainant. Further, the large number of Domain Names involved is a clear indication of a serial cybersquatting ring.

The content of some of the Websites was calculated to give the impression they have been authorised by or connected to the Complainant when this is not the case. These Websites were set up to deliberately mislead Internet users that they are connected to, authorised by, or affiliated with the Complainant. The Respondent employed the fame of the Trade Mark to mislead Internet users into visiting the Websites instead of the Complainant’s. From the above, the Panel concludes that the Respondent has intentionally attempted to attract, for commercial gain, by misleading Internet users into believing that the Websites and the products purportedly offered for sale and sold on them are those of or authorised or endorsed by the Complainant.

It is highly likely that Internet users, when typing the Domain Names into their browser or finding them through a search engine, would have been looking for a site operated by the Complainant rather than the Respondent. The Domain Names are likely to confuse Internet users trying to find the Complainant’s official website. Such confusion will inevitably result due to the fact that all the Domain Names comprise the Trade Mark in its entirety or the dominant element of the Trade Mark.

The Panel therefore also concludes that the Domain Names were registered and are being used in bad faith under paragraph 4(b)(iv) of the Policy.

The fact that some of the Domain Names may have been or are inactive or resolved to error or blocking pages do not prevent a finding of bad faith given that the distinctiveness and reputation of the Trade Mark, the composition of the Domain Names, the lack of a response from the Respondent, and the fact that the Domain Names are all under common control of a single person or entity which are using the other Domain Names for nefarious purposes.

Based on the available record, the Panel finds the third element of the Policy has been established.

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 Domain Names <gallerieslafayeettee.top>, <gallerieslafayettee.com>, <gallerieslafayetteee.top>, <gallerieslafayetteesp.top>, <gallerieslafayetteess.top>, <gallerieslafayettees.top>, <gallerieslafayetteest.top>, <gallerieslafayettee.top>, <gallerieslafayettess.top> and <gallerieslafayetttee.top> be transferred to the Complainant.

/Karen Fong/

Karen Fong

Sole Panelist

Date: May 5, 2025