

## **ADMINISTRATIVE PANEL DECISION**

Reliance Industries Limited v. Niyamath Sharieff, Reliance Wood Industries  
Case No. D2025-1615

### **1. The Parties**

The Complainant is Reliance Industries Limited, India, represented by Arjun T. Bhagat & Co., India.

The Respondent is Niyamath Sharieff, Reliance Wood Industries, India, represented by V-Legal Advocates & Solicitors, India.

### **2. The Domain Name and Registrar**

The disputed domain name <reliancewood.com> is registered with eNom, LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 22, 2025. On April 23, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 23, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Unknown) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 25, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on April 29, 2025.

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 of the Complaint, and the proceedings commenced on May 8, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 28, 2025. The Response was filed with the Center on May 29, 2025.

The Center appointed Ashwinie Kumar Bansal as the sole panelist in this matter on June 19, 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, Reliance Industries Limited is an old and a well-reputed business house founded by Mr. Dhirubhai Ambani in the 1960s as Reliance Textile Industries Pvt. Ltd. The Complainant later on changed its name to Reliance Industries Limited on June 18, 1985. The business group consists of 388 companies of which 348 companies are subsidiaries of the Complainant. The Complainant and its group companies are spread within India and throughout the world including United States of America, Germany, Australia, United Kingdom, the Netherlands, Malaysia, Singapore, Kenya, United Arab Emirates, etc. and a substantial number of such companies are incorporated with their primary name as "Reliance".

The Complainant has registered its website "www.ril.com" on January 4, 1996, in order to reach out to its Internet customers for publicity of its goods/services. The Complainant is the registered proprietor of approximately 1,400 trademarks which bear the Trademark RELIANCE as a prominent feature therein. Some of the registered Trademarks of the Complainant are Registration Nos. 475061 for RELAB RELIANCE PRODUCTS, registered on July 13, 1987; 604840, for RELIANCE, registered on August 24, 1993; 640715, for RELENE A RELIANCE PRODUCT (label), registered on September 21, 1994; 640716 for RECLAIR A RELIANCE PRODUCT, registered on September 21, 1994, 640717 for REON RELIANCE PRODUCT, registered on September 21, 1994; 2247365 for RIL RELIANCE PETROLEUM, registered on December 9, 2011 in class 01; 492356 for RELIANCE, registered on June 8, 1988; 874026 for RELIANCE (logo), registered on August 31, 1999 in class 16; 873985 for RELIANCE, registered on August 31, 1999; 874027 for RELIANCE, registered on August 31, 1999; 3478189 for RELIANCE PETROCHEMICALS CHEMISTRY FOR SMILES in class 17 registered on February 9, 2017; 874029 for RELIANCE (logo), registered on August 31, 1999; 2311832 for RIL RELIANCE INFRASTRUCTURE, registered on April 9, 2012; 5140328 for RELIANCE GROWTH IS LIFE, registered on September 20, 2021 in class 19; 873988 for RELIANCE, registered on August 31, 1999; 874030 for RELIANCE, registered on August 31, 1999; 1880699 for RELIANCE 1, registered on November 5, 2009 in class 20.

The Complainant has been using the Trademark RELIANCE since its registration and it has completed significant sales and services under the said Trademark. In order to promote the Trademark, the Complainant has spent large sums of money in advertisement and marketing, which has established its worldwide reputation and goodwill.

The disputed domain name was registered on March 4, 2010, resolved to the Respondent's website offering competing goods and services to Complainant's business.

#### **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 disputed domain name.

The Complainant registered the Trademark RELIANCE as its brand name and logo.

The Trademark RELIANCE has been widely reported in newspapers, print and electronic media and it has been extensively viewed and noticed by the public and members of trade across the country and abroad.

The Complainant had registered the Trademark No. 3320802 for RELWOOD on July 28, 2016 and thereafter launched the brand RELWOOD around April 2017 for an advanced wood alternative. The Complainant is the registered proprietor of the Trademark RELWOOD. The material sold under the brand RELWOOD is weather-resistant, waterproof, and built to endure Indian climatic conditions, all while surpassing the limitations of wood and plywood. The Complainant further states that unlike traditional wood, RELWOOD is engineered to withstand extreme temperatures, humidity, and environmental stress, ensuring long-lasting performance with minimal maintenance. It is 100% waterproof, highly durable, low maintenance, fully recyclable, and thermoformable, allowing limitless design possibilities. RELWOOD is a Natural Fibre

Polymer Composite (NFPC) which is used for production of sheets and various products used in a wide range of wood and plywood replacement applications. The construction sector and the furniture industry are the major recipient of the Complainant's product.

The Complainant submits that a large number of companies of the Complainant's Group are using the Complainant's Trademark RELIANCE in relation to their services, goods as part of their corporate name under a license, permission and authority as received from the Complainant. The trademark RELIANCE represents the overall brand or corporate identity behind a diverse portfolio of products and services, rather than a single item. Over time, the Complainant and its group companies have established significant goodwill and reputation under this mark and have been honored with various awards and recognitions. The Complainant contends that the Respondent's company, 'Relwood Industrial Packaging Private Limited' previously known as 'Reliance Wood Industries'), is not part of the Complainant group though the Trademark RELWOOD is owned by the Complainant. The Complainant has not given the Respondent any consent, authority, permission or license to use the Complainant's Trademark in any manner.

The disputed domain name comprises the Complainant's prior, invented and well-known Trademark and name in its entirety. By registering a disputed domain name that incorporates the Trademark RELIANCE with the addition of generic term "wood" in suffix, the Respondent has created a disputed domain name that is confusingly similar to the Complainant's Trademark RELIANCE in which the only the Complainant has rights.

The Complainant contends that its Trademark RELIANCE is recognized as a well-known trademark by various Indian courts and by a large section of society. The Complainant also contends that the disputed domain name is identical with and/or is in any case deceptively similar to the Complainant's Trademark RELIANCE. The Complainant has acquired valuable statutory rights in its Trademark RELIANCE, which rights are sought to be impinged and violated by the Respondent. The Complainant also contends that the Respondent has no right or any legitimate interest in respect of the disputed domain name because the Respondent has no trademark or license rights or any authorization to use the Trademark of the Complainant and thereby has no bona fide rights of offering of goods and services under the Policy. Over the Internet, the users are accustomed to reaching websites of well-known brands by searching for key words which identify those brands, and the search engine would show the web pages which include the said generic word in the disputed domain name. The only object of pirating any other person's name or Trademark which has acquired widespread reputation and goodwill is to take unfair and undue advantage of the reputation in the Complainant's Trademark RELIANCE. The Complainant contends that the disputed domain name, which contains its well-known Trademark, is being used exclusively to divert internet users to the Respondent's website, who may be attempting to access the Complainant's website.

The Complainant pleads that the disputed domain name be transferred to the Complainant.

## **B. Respondent**

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

The Respondent contends that it has registered the disputed domain name on March 4, 2010. The disputed domain name is not identical or confusingly similar to the Trademark of the Complainant, even though the disputed domain name > includes word "reliance" similar to the Complainant's company name. The Respondent has used the disputed domain name for 15 years without any prior objection from the Complainant. Though the Complainant has the Trademark RELIANCE, but the Complainant does not hold exclusive rights to this word across all industries. The Respondents' disputed domain name has a suffix "wood" and does not use the Complainants' logo, stylization or tagline. The Respondent has been engaged in packaging business for 27 years in Bengaluru, India and has been manufacturing many wood products and thereby the suffix "wood" is not a generic suffix but rather a specific term that has definite relevance to the goods and services being transacted by the Respondent. The branding is independently developed, showing no intent to divert the Complainants' customers.

The Respondent further contends that the Respondent was not maintaining the disputed domain name passively or “cybersquatting” – rather, he was legitimately using the disputed domain name to advertise and provide his products and services. The Respondent has been using the disputed domain name legitimately, without any intent to mislead consumers for commercial gain or to tarnish the RELIANCE Trademark.

The Respondent also contends that the disputed domain name was not registered or acquired primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name registration to the Complainant or to a competitor of the Complainant. The disputed domain name was registered for the purpose of being used in connection with an established business and was used in furtherance of that purpose for the last 15 years. The Complainant has provided no evidence in the Complaint that the Respondent has attempted to sell the disputed domain name or that the Respondent registered the disputed domain name with the intention to rent or transfer the disputed domain name to the Complainant or a competitor of the Complainant. The Respondent further contends that the disputed domain name was certainly not registered to prevent the owner of the Trademark from reflecting the Trademark in a corresponding the disputed domain name. The disputed domain name was certainly not registered with the primary purpose of disrupting the business of a competitor. The Complainant and the Respondent could not possibly have been competitors for the initial seven years following the registration of the disputed domain name, because until 2017, the Complainant was not involved with wood products or services.

The Respondent contends that the disputed domain name has not been registered in bad faith. The Respondent has legally established his business with a physical office and the disputed domain name was not registered to do spamming or phishing or for attracting the attention of the Complainant’s customers nor the Respondent is in any capacity to do so. There is not a single legal complaint against the Respondent wherein it has posed or tried to phish or scam or tried to pass off as the Complainant.

The Respondent requests the Panel not to accept the prayer sought by the Complainant.

## **6. Discussion and Findings**

The Complainant is required to make out its case in all respects under paragraph 4(a) of the Policy, which sets out the three elements that must be present for the proceedings to be brought against the Respondent, which the Complainant must prove to obtain a requested remedy. Paragraph 4(a) of the Policy provides as follows:

“Applicable Disputes. You [respondent] are required to submit to a mandatory administrative proceeding in the event that a third party (a ‘complainant’) asserts to the applicable Provider, in compliance with the Rules of Procedure, that:

- (i) [respondent’s] domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights; and
- (ii) [respondent] have no rights or legitimate interests in respect of the domain name; and
- (iii) [disputed] domain name has been registered and is being used in bad faith.

In the administrative proceeding, the complainant must prove that each of these three elements are present.”

The Panel will address all the three aspects of the Policy listed above hereunder:

### **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 trademark and the disputed domain name.

The Complainant has furnished evidence of its rights in the Trademark RELIANCE through details of its registrations. The Panel has considered and examined all the documents submitted by the Complainant in support of its claim that the Complainant has various registrations for the Trademark RELIANCE. There is no doubt that the Complainant has rights in the Trademark RELIANCE.

The entirety of the Trademark RELIANCE of the Complainant is reproduced within the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 1.7: “While each case is judged on its own merits, in cases where a domain name incorporates the entirety of a trademark, or where at least a dominant feature of the relevant trademark is recognizable in the domain name, the domain name will normally be considered confusingly similar to that trademark for purposes of UDRP standing.” In creating the disputed domain name, the Respondent has added the term “wood” to the Complainant’s Trademark RELIANCE. Although the addition of other term “wood” may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the Trademark for the purposes of the Policy. Accordingly, the disputed domain name is confusingly similar to the Trademark RELIANCE for the purposes of the Policy.

The Panel finds that the Complainant has successfully established the first element of paragraph 4(a)(i) of the Policy.

## **B. Rights or Legitimate Interests**

To succeed on this element, a complainant must make out a prima facie case that the Respondent lacks rights or legitimate interests in the domain name. If such a prima facie case is made out, then the burden of production shifts to the respondent to demonstrate rights or legitimate interests in the domain name. Paragraph 4(c) of the Policy enumerates several ways in which a respondent may demonstrate rights or legitimate interests in a domain name:

“Any of the following circumstances, in particular but without limitation, if found by the panel to be proved based on its evaluation of all evidence presented, shall demonstrate your rights or legitimate interests to the domain name for purposes of paragraph 4(a)(ii):

(i) before any notice to you of the dispute, your use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) you (as an individual, business, or other organization) have been commonly known by the domain name, even if you have acquired no trademark or service mark rights; or

(iii) you are making legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Respondent has submitted that he has used the disputed domain name since 2010 without any prior objection from the Complainant. He argues that the delay of 15 years in initiating these proceedings undermines the Complainant’s assertions of confusion or urgency and supports the position that the Complainant did not consider the use of the disputed domain name to be infringing its Trademark. The Panel finds it relevant to refer to [WIPO Overview 3.0](#), section 4.17, which addresses delays in filing complaints under the UDRP. It provides that “mere delay between the registration of a domain name and the filing of a complaint neither bars a complainant from filing such case, nor from potentially prevailing on the merits.” The UDRP remedy is injunctive in nature, aimed at halting ongoing or preventing future abuse rather than providing compensatory or equitable relief. Panels have acknowledged that trademark owners are not expected to monitor all potential instances of abuse continuously or to act immediately upon discovering them, particularly in light of the ease with which domain names can be registered. As such, panels have generally declined to adopt doctrines such as laches. However, in certain cases, a delay may make it more challenging for a complainant to establish its case, especially where the respondent can

demonstrate detrimental reliance on the delay. In view of the Complainant's pre-existing rights in the RELIANCE Trademark, the delay in filing the complaint does not bar the Complainant from initiating these proceedings.

The Respondent further states that he has been engaged in the wood manufacturing and packaging business for 27 years and has used the domain name <reliancewood.com> in connection with this business for the past 15 years. He claims to have used the disputed domain name legitimately to promote and offer his products and services.

The RELIANCE Trademark has been recognized as well-known in India, where the Respondent is also located. As noted in [WIPO Overview 3.0](#), section 3.2.2: "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 should have known, that its registration would be identical or confusingly similar to a complainant's mark." Considering the well-known status of the RELIANCE Trademark and the Complainant's substantial reputation and goodwill, the Panel finds it improbable that the Respondent was unaware of the Complainant or its mark. The Respondent registered a domain name incorporating the Complainant's well-established Trademark. In this context, the Respondent's claim of having used the domain name for 15 years does not carry significant weight.

The Respondent contends that his business has been commonly known by the name "Reliance Wood Industries," although he has not registered it as a trademark. He has produced supporting documents, including a certificate dated February 12, 2002, issued by the Directorate of Industries and Commerce, Government of Karnataka, and a Provisional VAT Registration dated March 29, 2003, from the Commercial Taxes Department, both in the name of "Reliance Wood Industries."

While these documents indicate that the Respondent has conducted business under the name "Reliance Wood Industries," it is undisputed that the Respondent is neither affiliated with the Complainant nor authorized by it to use the RELIANCE Trademark. Nonetheless, under Paragraphs 4(c)(i) and 4(c)(ii) of the Policy, the Respondent has demonstrated some rights or legitimate interests in the disputed domain name. The Panel acknowledges the Complainant's long-standing use and reputation in the RELIANCE Trademark and finds it plausible that the Respondent was aware of the Complainant at the time of registration. However, the Panel also observes that the Respondent has used the domain name for over 15 years in connection with an ongoing, independent business enterprise. These circumstances create a tension between the potential inference of bad faith registration and evidence of legitimate use.

Given this ambiguity and bearing in mind that the UDRP is designed to address clear-cut cases of cybersquatting rather than complex trademark disputes involving competing rights or questions of bona fide use, the Panel concludes that this matter lies outside the narrow scope of the UDRP and is better suited for resolution before a court or appropriate authority under national trademark law.

Accordingly, the Panel finds that the Complainant has failed to establish the second element under paragraph 4(a)(ii) of the Policy.

### **C. Registered and Used in Bad Faith**

The registration and use requirements of paragraph 4(a)(iii) of the Policy are conjunctive, and a complainant bears the burden of proof on each. If either of the required elements are not established, then the Complaint cannot succeed. Paragraph 4(b) of the Policy identifies, in particular but without limitation, four circumstances which, if found by the Panel to be present, shall be evidence of the registration and use of the disputed domain name in bad faith. The Complainant is required to prove both that the disputed domain name was registered in bad faith and that it is being used in bad faith. Paragraph 4(b) of the Policy enumerates as follows:

“For the purposes of paragraph 4(a)(iii) of the Policy, the following circumstances, in particular but without limitation, if found by the Panel to be present, shall be evidence of the registration and use of the domain name in bad faith:

(i) circumstances indicating that the Respondent has registered or has acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the Complainant who is the owner of the trade mark or service mark or to a competitor of the Complainant, for valuable consideration in excess of its documented out-of-pocket costs directly related to the domain name; or

(ii) the Respondent has registered the domain name in order to prevent the owner of the trade mark or service mark from reflecting the mark in a corresponding domain name, provided that the Respondent has engaged in a pattern of such conduct; or

(iii) the Respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website or other online location, by creating a likelihood of confusion with the Complainant’s mark as to the source, sponsorship, affiliation, or endorsement of the Respondent’s website or location or of a product or service on the Respondent’s website or location.”

The Trademark “RELIANCE” has been in continuous use since 1966, beginning with Reliance Textile Industries Private Ltd., which underwent multiple name changes and amalgamations, eventually becoming Reliance Industries Limited in 1985. The mark has been used for over five decades by the Complainant and its predecessors. The Complainant possesses a longstanding corporate history spanning several decades. It is further significant that both Parties are established within the same jurisdiction. The Complainant’s Trademark RELIANCE is a well-known Trademark in India and the Panel considers that there is virtually no possibility that the Respondent was unaware of the existence of the Complainant and/or its Trademark RELIANCE. The Complainant has not licensed, authorized, or permitted the Respondent to register the disputed domain name incorporating the Complainant’s Trademark. Thus, in the circumstances of this case, in the absence of any license or permission from the Complainant to use its Trademark, no actual or contemplated bona fide or legitimate use of the disputed domain name could reasonably be claimed by the Respondent. Such unauthorized registration by the Respondent suggests opportunistic bad faith in these circumstances.

The Complainant has produced evidence of registration of the Trademark RELIANCE in the year 1993 and contends that it has been using the Trademark extensively since long. The Respondent registered the disputed domain name on March 4, 2010, incorporating in its entirety the Trademark RELIANCE of the Complainant. The Respondent’s registration and use of the impugned domain name has prevented the Complainant, the rightful owner of the Trademark RELIANCE, from utilizing the domain name for its own purposes, resulting in a disruption of the Complainant’s business. The registration of disputed domain name by the Respondent can mislead and misdirect internet users to its web site causing them to believe that the Respondent is associated with, has some sponsorship or affiliation with the Complainant when no such thing exists.

Paragraph 4(b)(iv) of the Policy provides that the intentional use of a domain name to attract users to a website for commercial gain, by creating a likelihood of confusion with the complainant’s mark, establishes bad faith in the registration and use of the domain name. In the present case, the Panel notes that the Respondent more likely than not used the disputed domain name for his own commercial gain by creating a likelihood of confusion with the Complainant’s Trademark.

In view of the above, the Panel concludes that the third condition provided for by paragraph 4(a)(iii) of the Policy is met. The Panel therefore finds that the disputed domain name has likely been registered and is being used by the Respondent in bad faith.

## 7. Decision

The Complainant must satisfy all three elements under paragraph 4(a) of the Policy to succeed. However, the second element (4(a)(ii)) has not been proven in this case. Therefore, the Complaint is denied.

*/Ashwinie Kumar Bansal/*

**Ashwinie Kumar Bansal**

Sole Panelist

Date: July 12, 2025