

ADMINISTRATIVE PANEL DECISION

Stephen Alexander / DAS RFP, LLC d/b/a Casetrack v. Daniel Meeler,
Precise Media LLC
Case No. D2026-0201

1. The Parties

The Complainant is Stephen Alexander / DAS RFP, LLC d/b/a Casetrack, United States of America (“United States”), internally represented.

The Respondent is Daniel Meeler, Precise Media LLC, United States, represented by Berkeley Law P.A , United States.

2. The Domain Name and Registrar

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

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 18, 2026. On January 19, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 20, 2026, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on January 21, 2026, 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 January 23, 2026.

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 January 26, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 15, 2026. The Response was filed with the Center on February 6, 2026. On February 10, 2026, both the Complainant and the Respondent filed supplemental filings to the Center. The Panel has, in its discretion, considered the supplemental filings.

The Center appointed Evan D. Brown as the sole panelist in this matter on February 17, 2026. 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 is in the business of providing software as a service for Medicaid billing compliance and automated documentation validation for healthcare waiver providers. The Complainant asserts that it has used the mark CASETRACK in commerce in connection with its services since July 16, 2019. The Complainant does not own a registered trademark for CASETRACK but states that it has filed an application for registration of that mark with the United States Patent and Trademark Office, which remains pending. The Complainant relies on alleged common law or unregistered rights in the mark CASETRACK.

The disputed domain name was registered on January 19, 2025, and it resolves to generic log in page. Although the disputed domain name was originally registered in 1997, the Respondent acquired it on the secondary market after the prior registration expired and was deleted from the registry. The Respondent asserts that it acquired the disputed domain name for its descriptive value, given its suitability for a variety of legitimate uses relating to the tracking of cases, files, workflows, or records across numerous industries.

5. Parties' Contentions

A. Complainant

The Complainant contends that the disputed domain name is identical or confusingly similar to the Complainant's CASETRACK mark; that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and that the disputed domain name was registered and is being used in bad faith.

B. Respondent

The Respondent disputes the contentions of the Complainant under all three elements of the Policy, but of most relevance to the Panel's determination in this matter, the Respondent asserts that the term "case track" is composed of common English words that describe the act of tracking cases, files, workflows, or records, and that the disputed domain name thereby has substantial descriptive value. The Respondent states that it acquired the disputed domain name on the secondary market after it expired, and that it did so for its descriptive qualities, not to target the Complainant.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights, (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name, and (iii) the disputed domain name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

The Complainant relies on unregistered or common law rights in its CASETRACK mark. Where a complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case. WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.2.1.

But as in this case, when a complainant relies on unregistered or common law rights, it must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services. [WIPO Overview 3.1](#), section 1.3. The Panel notes that the Complainant's pending trademark application is not sufficient to establish unregistered trademark rights under the Policy.

For purposes of paragraph 4(a)(i) of the Policy, and consistent with United States trademark law, in cases involving claimed common law or unregistered trademarks that are descriptive in nature, a complainant must present convincing evidence of secondary meaning or acquired distinctiveness. *Roadcam, Inc. v. Jon Smejkal*, WIPO Case No. [D2014-1980](#); [WIPO Overview 3.1](#), section 1.3.

The Panel agrees with the Respondent's observation that the term "case track" consists entirely of ordinary English words that could describe the act of tracking cases, files, workflows, or records - a function widely referenced across numerous industries including legal services, government administration, healthcare, logistics, and software. In the context of software for Medicaid billing compliance and automated documentation validation, the term is descriptive.

Because the asserted mark is descriptive, the Complainant bears a heightened burden to demonstrate that CASETRACK has acquired distinctiveness in the marketplace such that relevant consumers recognize it as identifying the Complainant's services rather than merely describing their function.

However, the assertions and evidence offered in support of use of the mark are scant and largely internal in nature. The record in this respect consists of the following:

- A claimed adoption date of October 28, 2018, supported only by an internal Google Cloud Platform notification email.
- An alleged date of first use in interstate commerce of July 16, 2019, supported by database records relating to a single customer - a Medicaid waiver services company owned by the Complainant's wife.
- Screenshots of a website at the domain name <casetrack.net>, without any accompanying evidence of website traffic, user engagement, customer numbers, advertising expenditures, or other indicia of public exposure.
- Documents reflecting registration of the business "DAS RFP, LLC" with the Texas Secretary of State, none of which reference the CASETRACK mark.
- A single invoice totaling USD 5,250 on DAS RFP letterhead, issued to the business owned by the Complainant's wife, listing two software line items bearing the CASETRACK name.

Relevant evidence demonstrating acquired distinctiveness (also referred to as secondary meaning) includes a range of factors such as (i) the duration and nature of the use of the mark (which may include social media presence and engagement), (ii) the amount of sales under the mark and during which time period, (iii) the nature and extent of advertising using the mark - including expenditures over a relevant time period, (iv) the degree of actual public (e.g., consumer, industry, or media) recognition, and (v) consumer surveys. [WIPO Overview 3.1](#), section 1.3.

The record here is devoid of meaningful evidence on these factors. There is no evidence of substantial sales under the CASETRACK name, no advertising expenditures, no media references, no industry recognition, no social media presence, and no consumer survey evidence. The Complainant has not provided evidence demonstrating that consumers in the relevant marketplace perceive CASETRACK as a distinctive source identifier.

Moreover, the Complainant materially mischaracterizes the evidence it submitted. In its declaration and supporting materials, the Complainant claims to have submitted a “Texas DBA filing” authorizing use of “CaseTrack” as an assumed name. However, the Texas Secretary of State documents it relies upon reflect only the formation of DAS RFP, LLC as a limited liability company and contain no reference whatsoever to “CaseTrack” or to any assumed name filing.

As such, for purposes of the present proceeding, the Panel concludes that the Complainant has not established that it currently has unregistered or common law trademark or service mark rights in the mark CASETRACK. Demonstrating unregistered or common law rights in a descriptive mark requires proof of acquired distinctiveness sufficient to show that the public has come to recognize the term as a symbol that distinguishes the Complainant’s services from those of others. The evidence submitted by the Complainant, without more, does not in the Panel’s judgment shed substantial light on how consumers are likely to perceive the CASETRACK mark in the marketplace.

B. Rights or Legitimate Interests

Because the Panel has determined that the Complainant has not met the first and third elements under the Policy, it declines to address this second element.

C. Registered and Used in Bad Faith

Because the Panel has concluded that the Complainant has failed to establish rights in a trademark or service mark under paragraph 4(a)(i) of the Policy, it is unnecessary to reach a determination under the third element of the Policy. Nevertheless, the Panel notes that the record would not support a finding that the disputed domain name was registered and used in bad faith.

Under paragraph 4(a)(iii) of the Policy, a complainant must demonstrate that the disputed domain name was both registered and used in bad faith. This generally requires evidence that the respondent targeted the complainant’s trademark when registering the domain name. See [WIPO Overview 3.1](#), section 3.1.

Here, the Respondent states, among other things, that it selected the disputed domain name because it consists of common English words that describe the concept of tracking cases, files, workflows, or records. The Panel finds this explanation plausible, particularly given the descriptive character of the phrase “case track”.

Moreover, as discussed more fully above, the Complainant has not demonstrated that the CASETRACK designation had acquired distinctiveness or recognition in the marketplace at the time the Respondent acquired the disputed domain name. Without such recognition, it would be difficult to conclude that the Respondent had the Complainant specifically in mind when registering the disputed domain name.

The Panel also notes that the disputed domain name resolves only to a generic login page. There is no evidence in the record that the Respondent has attempted to impersonate the Complainant, target its customers, disrupt its business, or otherwise capitalize on any alleged reputation associated with the CASETRACK name.

On the record before it, the Panel finds no persuasive evidence that the Respondent registered the disputed domain name with knowledge of, or intent to target, the Complainant or any trademark rights it might claim.

Accordingly, even if the Panel had reached the third element, the Complainant would not have established that the disputed domain name was registered and used in bad faith within the meaning of paragraph 4(a)(iii) of the Policy.

D. Reverse Domain Name Hijacking

The Respondent has requested that the Panel make a finding of Reverse Domain Name Hijacking.

Paragraph 15(e) of the Rules provides that if, after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or primarily to harass the domain name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

Section 4.16 of the [WIPO Overview 3.1](#) explains that panels have found Reverse Domain Name Hijacking where, inter alia, facts demonstrate that the complainant ought to have known it could not succeed under any fair interpretation of facts reasonably available prior to the filing of the complaint.

In the present case, the Panel has concluded that although the Complainant failed to establish threshold trademark rights, and did not provide any evidence to support bad faith registration and use, a finding of Reverse Domain Name Hijacking is not warranted, particularly since the Complainant is proceeding on a pro se basis.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Evan D. Brown/

Evan D. Brown

Sole Panelist

Date: March 12, 2026