

ADMINISTRATIVE PANEL DECISION

Uber Technologies, Inc. v. Justin Drazin
Case No. D2026-0744

1. The Parties

The Complainant is Uber Technologies, Inc., United States of America (“United States”), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

The Respondent is Justin Drazin, United States, represented by Cowan, DeBaets, Abrahams & Sheppard, LLP, United States.

2. The Domain Names and Registrar

The disputed domain names <injureduber.com>, <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, <njuberlawsuit.com>, <uberhurtme.com>, and <uberhurtyou.com> are registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 21, 2026. On February 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 23, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 27, 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 amendment to the Complaint on February 27, 2026.

The Center verified that the Complaint together with the amendment to the 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 March 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 27, 2026. The Response was filed with the Center on March 26, 2026. The supplemental filing submitted by the Complainant was received by the Center On April 3, 2026. On April 7, 2026, the Respondent submitted an objection to the Complainant's Supplemental Filing.

The Center appointed William F. Hamilton as the sole panelist in this matter on April 8, 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, Uber Technologies, Inc., is a Delaware corporation founded in 2009 and headquartered in San Francisco, California. It operates a global technology platform connecting consumers with independent drivers for ridesharing services, as well as meal delivery and other services. As of December 31, 2025, the Complainant reported approximately 202 million monthly active platform consumers, revenues of USD 52 billion, and operations in more than 70 countries and 15,000 cities worldwide. The Complainant is the owner of more than 1,700 trademark registrations for the UBER mark in at least 91 jurisdictions, the earliest of which was registered on August 31, 2010. The UBER mark is widely recognized and has become part of the public lexicon.

The Respondent, Justin Drazin, is a licensed attorney and principal of Drazin & Warshaw P.C., a personal injury law firm based in New Jersey with more than 75 years of practice. The firm represents clients in matters including motor vehicle accidents, premises liability, and rideshare-related incidents. The Respondent registered the seven disputed domain names at various times between March 7, 2017, and February 6, 2025, all through the Registrar.

The seven disputed domain names fall into two functional categories as of the time this proceeding was filed. The first category comprises three disputed domain names used in connection with the Respondent's law firm: <uberhurtme.com> resolves to a website branded "UberHurtMe" and operated by Drazin & Warshaw P.C.; <injureduber.com> and <njuberlawsuit.com> redirect to the Drazin & Warshaw P.C. homepage at "drazinandwarshaw.com", a page that does not specifically reference Complainant or claims arising from Complainant's services. The second category comprises the four disputed domain names, <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, and <uberhurtyou.com>, each of which resolves to a website consisting primarily of blog-style posts and monetized pay-per-click ("PPC") links, including links labeled "Personal Injury Lawyer" and "Vehicle Accident Claims". As noted in the Complainant's Supplemental Filing, these PPC pages remained unchanged after the filing of the Complaint.

In early February 2026, the Respondent contacted the Complainant's Senior Director of Intellectual Property at Uber Technologies by email, disclosing that he had received an offer from a third-party national personal injury law firm to acquire the disputed domain names and asking whether the Complainant had any interest in acquiring them. The Complainant's Senior Director responded that he was not interested in making an offer. On February 9, 2026, the Respondent nonetheless provided the Complainant with a term sheet proposing to sell the disputed domain names for USD 4.8 million, describing them as "valuable operating assets" and noting that the competing offer carried risk he wished to mitigate through a simpler transaction with Uber. Three days earlier, the Respondent had informed the Complainant that he was "in the process of reviewing deal terms of an offer to acquire some domains that I currently own" and that the prospective buyer was "a very large national personal injury firm". The Complainant filed this proceeding on February 21, 2026.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the three elements required under the Policy for a transfer of the disputed domain names.

With respect to the first element, the Complainant asserts that it is the owner of more than 1,700 trademark registrations for the UBER mark in at least 91 jurisdictions worldwide, the earliest of which was registered on August 31, 2010. The Complainant further asserts that the UBER mark is famous and widely known and that the Complainant is a public company with approximately 34,000 employees and operations in more than 15,000 cities around the world. The Complainant contends that each of the seven disputed domain names incorporates the UBER mark in its entirety, and that the addition of the descriptive or geographical terms "injured", "my", "case", "injury", "lawsuit", "nj", "hurt", "me", and "you" does not prevent a finding of confusing similarity under the Policy. The Complainant relies on WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), sections 1.7 and 1.8, as well as numerous prior panel decisions involving analogous domain name constructions.

With respect to the second element, the Complainant contends that it has never authorized the Respondent to register or use the UBER mark in any manner, and that the Respondent has no relationship with the Complainant. The Complainant asserts that the Respondent, the principal of the New Jersey personal injury law firm Drazin & Warshaw P.C., cannot establish rights or legitimate interests in the disputed domain names under any of the three circumstances set forth in paragraph 4(c) of the Policy. With respect to the three disputed domain names that redirect to or are used in connection with the Respondent's law firm website, namely <injureduber.com>, <njuberlawsuit.com>, and <uberhurtme.com>, the Complainant argues that using a trademark in a domain name to advertise legal services targeting consumers injured by the mark owner does not constitute a bona fide offering of goods or services, relying principally on *Instagram, LLC v. Brian Breiter, Law Offices of Brian Breiter*, WIPO Case No. [D2022-2149](#), and *Verizon Trademark Services LLC v. 石磊 (Shi Lei / Lei Shi)*, WIPO Case No. [D2024-1150](#). The Complainant further argues that such use is commercial in nature and cannot qualify as fair use under paragraph 4(c)(iii) of the Policy because the Respondent does not offer services described by the UBER mark and does not disclose its non-relationship with the Complainant on the relevant websites. With respect to the four disputed domain names that resolve to PPC or splog pages, namely <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, and <uberhurtyou.com>, the Complainant contends that such use cannot constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the domain names under the Policy.

With respect to the third element, citing [WIPO Overview 3.1](#), section 3.1.4, the Complainant contends that the UBER mark's fame alone creates a presumption of bad-faith registration. The Complainant further contends that the Respondent's registration of seven domain names incorporating the UBER mark constitutes a pattern of bad faith conduct under paragraph 4(b)(ii) of the Policy. The Complainant asserts that the Respondent's use of the disputed domain names in connection with PPC pages featuring personal injury related sponsored links constitutes bad faith under paragraph 4(b)(iv) of the Policy, as it intentionally attempts to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark. Most significantly, the Complainant contends that the Respondent's offer to sell all seven disputed domain names to the Complainant for USD 4.8 million, coupled with the Respondent's disclosure that he had received a competing offer from a national personal injury law firm, constitutes bad faith under paragraph 4(b)(i) of the Policy, as an attempt to sell the domain names for valuable consideration far in excess of the Respondent's documented out-of-pocket costs.

In its Supplemental Filing of April 3, 2026, the Complainant additionally contends that the Respondent's Response mischaracterizes the nature of the parties' pre-litigation communications, misstates the actual use being made of the disputed domain names, and fails to provide any documentation supporting its claim of substantial investment in developing the websites associated with the disputed domain names. The Complainant further contends that the Respondent's own law firm already maintains a dedicated web page regarding the Complainant's services, at "www.drazinandwarshaw.com/uber-assault-claim-lawyers/", which

the Complainant argues demonstrates that the Respondent has alternative means of reaching potential clients and that use of the UBER mark in the disputed domain names is unnecessary for the provision of the claimed legal services.

B. Respondent

The Respondent contends that the Complainant has not satisfied any of the three elements required under the Policy for a transfer of the disputed domain names and further requests a finding of Reverse Domain Name Hijacking.

With respect to the first element, the Respondent contends that the disputed domain names are not confusingly similar to the UBER mark because context matters in the confusing similarity analysis, and that the combination of the UBER mark with terms explicitly referencing injuries, accidents, and lawsuits conveys a meaning distinct from the Complainant's brand identity. The Respondent argues that a consumer encountering domain names such as <uberhurtme.com> or <myuberlawsuit.com> would understand them as references to legal claims against the Complainant, not as websites operated by or affiliated with the Complainant. The Respondent further contends that the Complainant's cited decisions are distinguishable because they involved respondents who defaulted and presented no substantive arguments, and that no finding of confusing similarity should follow from the mere textual presence of a trademark within a longer descriptive phrase.

With respect to the second element, the Respondent contends that it has rights and legitimate interests in the disputed domain names on three independent grounds. First, the Respondent asserts that the disputed domain names are used in connection with a bona fide offering of legal services under paragraph 4(c)(i) of the Policy. The Respondent describes itself as an established personal injury law firm with over 75 years of practice, whose representation of clients in rideshare-related injury matters provides a legitimate professional basis for registering and using the disputed domain names. The Respondent contends that several of the disputed domain names resolve directly to the firm's website, which provides information about legal claims arising from Complainant's services, and that providing such information and offering legal representation constitutes a legitimate offering of services directly related to the mark at issue.

Second, and most centrally, the Respondent asserts that its use of the disputed domain names is protected by the doctrine of nominative fair use. The Respondent argues that a law firm representing individuals injured in incidents related to Complainant's services cannot reasonably communicate the nature of its services without referencing the UBER mark, and that the three conditions for nominative fair use are satisfied: the subject matter of the services cannot readily be identified without using the UBER mark; only the textual word "UBER" is used, without logos or proprietary branding; and the use does not imply sponsorship or endorsement by the Complainant. The Respondent contends that no reasonable consumer would believe that the Complainant operates websites containing terms explicitly referring to injuries or lawsuits arising from its own services, and that the disputed domain names make clear they are adverse to, rather than affiliated with, the Complainant. The Respondent relies on *New Kids on the Block v. News America Publishing, Inc.*, 971 F.2d 302 (9th Cir. 1992), and argues that the test set out in *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. [D2001-0903](#) ("Oki Data") is satisfied because the Respondent's use does not falsely suggest affiliation with the Complainant.

Third, the Respondent contends that certain of the disputed domain names that currently resolve to registrar-generated placeholder pages do not reflect deliberate exploitation of the Complainant's UBER mark, and that the mere presence of such pages, without additional evidence of targeting, does not violate the Policy.

With respect to the third element, the Respondent contends that the disputed domain names were registered to develop informational websites and to attract clients injured while using Complainant's services, which it asserts constitutes legitimate business activity and not bad faith registration or use. Regarding the offer to sell the disputed domain names for USD 4.8 million, the Respondent contends that the Complainant has materially mischaracterized the circumstances of those communications. The Respondent asserts that it acted responsibly and in good faith by informing the Complainant of the third-party inquiry and offering the

Complainant the first opportunity to acquire the domains, rather than allowing them to pass to a competing law firm whose use of the domains the Respondent characterizes as potentially more harmful to the Complainant. The Respondent further contends that the Complainant's representative solicited a formal offer, that the price proposed reflected the Respondent's substantial investment in developing the digital platforms associated with the disputed domain names, and that a solicited offer to sell domain names does not constitute bad faith under the Policy, particularly where the domains were originally registered for legitimate purposes. The Respondent argues that the UDRP was never intended as a mechanism to transfer developed business assets to trademark owners without compensation, and that the Complainant filed this proceeding after rejecting commercial terms it had itself invited.

The Respondent further contends that accepting the Complainant's position would effectively allow large corporations to suppress websites informing consumers of potential legal claims in contravention of the UDRP's limited purpose of addressing cybersquatting rather than restricting lawful informational speech or attorney advertising.

With respect to the Complainant's Supplemental Filing, the Respondent objects to its acceptance on the ground that it raises no new issues not already addressed in the Complaint and that the matters discussed were reasonably foreseeable to the Complainant at the time of filing.

Finally, the Respondent contends that the Complainant is engaging in Reverse Domain Name Hijacking by filing this proceeding in an attempt to obtain the disputed domain names without compensation after commercial negotiations failed, by misrepresenting the nature of those negotiations to the Panel, and in the knowledge that the disputed domain names constitute nominative fair use and that the Respondent's legitimate business activities do not constitute bad faith registration or use.

6. Discussion and Findings

A. The Supplemental Filing

The Policy and Rules do not expressly provide for supplemental filings, and panels generally admit them only in limited circumstances, such as where a party could not reasonably have anticipated the matters raised by the other side. [WIPO Overview 3.1](#), section 4.6. The Respondent objects to the Complainant's Supplemental Filing of April 3, 2026, on the ground that it raises no new issues not already addressed in the Complaint.

The Panel disagrees. The Respondent's Response introduced for the first time a detailed account of the pre-litigation sale negotiations that materially differs from the Complainant's characterization, and a claim of Reverse Domain Name Hijacking. These are not arguments the Complainant could reasonably have anticipated when it filed the Complaint. The Supplemental Filing responds directly and specifically to each of them. The Panel accordingly exercises its discretion to accept the Supplemental Filing and has considered it in reaching its Decision.

B. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain names. [WIPO Overview 3.1](#), section 1.7.

The Complainant has clearly demonstrated rights in the UBER mark for purposes of the Policy, having registered that mark in more than 91 jurisdictions worldwide, with registrations dating to August 31, 2010. The UBER mark is widely known and has achieved a level of recognition that extends well beyond the Complainant's core ridesharing services.

Each of the seven disputed domain names incorporates the UBER mark in its entirety. Under well-established UDRP jurisprudence, where a disputed domain name incorporates a complainant's trademark in full, the domain name will normally be considered confusingly similar to that mark for purposes of standing. [WIPO Overview 3.1](#), section 1.7. The Panel finds the Respondent's argument that descriptive injury and litigation related modifiers dispel confusing similarity at the threshold stage unpersuasive. The first element inquiry is narrow and is not the appropriate stage at which to consider whether the domain names' associative context with legal claims against the Complainant might reduce consumer confusion. Those considerations, to the extent they are relevant at all, belong to the second and third elements.

The addition to each disputed domain name of descriptive terms such as "injured", "my", "case", "injury", "lawsuit", "nj", "hurt", "me", and "you" does not prevent a finding of confusing similarity between the disputed domain names and the UBER mark for purposes of the Policy. [WIPO Overview 3.1](#), section 1.8. The Panel notes, moreover, that the website content associated with several of the disputed domain names specifically and repeatedly references the Complainant and its UBER mark, thereby confirming that the Respondent understood the disputed domain names as targeting the UBER mark. [WIPO Overview 3.1](#), section 1.15. The Panel finds that the first element of the Policy has been established.

C. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a non-exhaustive list of circumstances in which a respondent may demonstrate rights or legitimate interests in a disputed domain name, including: (i) use of the domain name in connection with a bona fide offering of goods or services before notice of the dispute; (ii) being commonly known by the domain name; and (iii) legitimate noncommercial or fair use of the domain name without intent for commercial gain to misleadingly divert consumers or to tarnish the mark.

Although the overall burden of proof in UDRP proceedings rests with the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests may require a complainant to establish facts primarily within the respondent's knowledge or control. Accordingly, where a complainant makes out a prima facie case that a respondent lacks rights or legitimate interests, the burden of production shifts to the respondent to come forward with relevant evidence demonstrating such rights or interests, although the burden of proof always remains with the complainant. If the respondent fails to come forward with relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.1](#), section 2.1.

The Complainant has established a prima facie case. The Complainant has never authorized the Respondent to register or use the UBER mark in any manner. The Respondent is not commonly known by any of the disputed domain names. The Respondent has not acquired any trademark or service mark rights in any of the disputed domain names. The Respondent has set up a URL within its firm website that explains its services as they relate to potential litigation with the Complainant. The burden of production therefore shifts to the Respondent to demonstrate rights or legitimate interests.

The Respondent has come forward with substantive arguments, principally a claim of bona fide use in connection with the offering of legal services and a claim of nominative fair use. The Panel addresses each in turn, treating the seven disputed domain names in two groups that reflect their distinct uses: the three disputed domain names associated with the Respondent's law firm websites and the four domain names resolving to PPC pages.

i. The Law Firm Disputed Domain Names

The Respondent is a legitimate and established personal injury law firm with a genuine practice representing clients in rideshare-related injury matters. The Panel does not question the legitimacy of that practice, nor does this decision in any way limit the Respondent's ability to represent individuals who have been injured while using Uber's services. The question before the Panel is the narrower one of whether the Respondent's use of domain names incorporating the Complainant's UBER mark constitutes a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy.

The principal framework for evaluating this question is the test set out in *Oki Data*. Under *Oki Data*, a use of a trademark in a domain name may qualify as a bona fide offering of goods or services where, at a minimum: the respondent is actually offering the goods or services at issue; the respondent uses the site to sell only the trademarked goods or services; the site accurately discloses the registrant's relationship with the trademark owner; and the respondent has not attempted to corner the market in domain names incorporating the mark.

The Respondent fails this test on multiple grounds with respect to the law firm disputed domain names. With respect to <injureduber.com> and <njuberlawsuit.com>, both of which redirect to the Drazin & Warshaw P.C. homepage, the homepage does not specifically reference the Complainant, Complainant related claims, or rideshare incidents. A visitor arriving at the Drazin & Warshaw homepage via one of these disputed domain names would encounter a general personal injury law firm website with no indication of any specific connection to claims related to Complainant's services. Domain names do not accurately convey the purpose to which they are put where they redirect to a general law firm website that does not specifically address the subject matter suggested by the domain name. *Instagram, LLC v. Brian Breiter, Law Offices of Brian Breiter*, WIPO Case No. [D2022-2149](#).

With respect to <uberhurtme.com>, which resolves to a specifically developed website branded "UberHurtMe" and focused on injury claims related to Complainant's services, the website does address the subject matter suggested by the domain name and it does not impersonate the Complainant. However, the *Oki Data* test is not satisfied. The website does not accurately disclose the Respondent's non-relationship with the Complainant, and the UBER mark is used prominently and repeatedly on the website, including in a manner that creates a risk of confusion as to the source or sponsorship of the site. The website's dominant textual element, "Injured in an Uber Accident? We Can Help," occupies the majority of the landing page (without any specific disclaimer clarifying that the site is neither operated by nor affiliated with the Complainant). While the Complainant's logo/branding is not displayed on this page, there is a phone number listed which used the mark: "888-890-UBER", and an unwitting visitor could potentially understand this as originating from the Complainant, whether as a consumer assistance resource or in connection with the Complainant's own legal affairs management. [WIPO Overview 3.1](#), section 2.5.2(iii). The Panel also notes that this content can be changed by the Respondent at any time. Moreover, as discussed further below, the Respondent has registered seven domain names incorporating the UBER mark, which itself weighs against a finding of bona fide use under the *Oki Data* framework.

The Panel further notes that the Respondent's use of the law firm disputed domain names is commercial in nature, directed at acquiring paying clients for legal representation. This forecloses any argument that the use qualifies as legitimate noncommercial or fair use under paragraph 4(c)(iii) of the Policy. [WIPO Overview 3.1](#), section 2.5.3.

The Respondent also argues that its use of the disputed domain names is protected by the doctrine of nominative fair use. The nominative fair use doctrine originated in United States trademark law, most influentially in *New Kids on the Block v. News America Publishing, Inc.*, 971 F.2d 302 (9th Cir. 1992) ("New Kids"). Its core premise is that a party should not be liable for trademark infringement when it uses another's mark solely to refer to that party's goods, services, or identity, and where such reference is the only practical means of identification. Under the *New Kids* formulation, nominative fair use is established where the product or service in question is not readily identifiable without use of the trademark, only so much of the mark is used as is reasonably necessary to identify the product or service, and the user does nothing that would suggest sponsorship or endorsement by the trademark holder. The Respondent invokes this doctrine to argue that a personal injury law firm representing clients with claims against the Complainant cannot communicate the nature of its services without using the UBER mark and that the disputed domain names are therefore a permissible descriptive reference to the subject matter of those services.

The nominative fair use doctrine reflects an important and legitimate principle. Trademark law does not grant a mark owner the right to suppress all references to its name, and a party that genuinely needs to identify the subject matter of its services by reference to another's mark may, in appropriate circumstances, do so without liability. This principle has some resonance in the UDRP context as well. WIPO panels have

recognized that descriptive or referential use of a trademark may, in appropriate circumstances, support a finding of legitimate interests. [WIPO Overview 3.1](#), section 2.8. However, the nominative fair use doctrine as developed in United States law and as recognized in UDRP jurisprudence has significant limiting principles that are fatal to the Respondent's argument in this case.

The first and most fundamental limiting principle is necessity. The doctrine protects only those uses of a trademark that are genuinely required to identify the subject matter in question. It does not protect uses that are merely convenient or commercially advantageous.

Here, the Respondent's own law firm maintains a dedicated page addressing Complainant related legal claims at "www.drazinandwarshaw.com/uber-assault-claim-lawyers/", a URL that references Complainant's services descriptively without incorporating the UBER mark as the primary element of a registered domain name. This page demonstrates that the Respondent can reach potential clients with claims arising from the Complainant's services, and can describe those services clearly and effectively, through a descriptive URL path within its established domain.

This conclusion is reinforced by the Complainant's showing that numerous other personal injury law firms actively advertise services to individuals with claims arising from the Complainant's ridesharing services, including through Google search results for terms such as "Uber accident lawyer", "Uber injury claim", and "Uber lawsuit attorney", without incorporating the UBER mark as the primary element of any registered domain name. The availability of these alternative means of identification confirms that use of the UBER mark in a registered domain name is not a practical necessity for firms offering legal services in this area.

The second limiting principle concerns the domain name context specifically. Nominative fair use developed primarily in the context of inline text use, where a mark appears within a sentence or article as a reference to the mark owner. The domain name context presents a structurally different situation. A domain name functions as an identifier of origin. When the UBER mark appears as the most prominent or dominant element of a domain name, the natural inference of an Internet user is that the domain is operated by or affiliated with the Complainant, or at minimum that it is the kind of domain the Complainant itself might register. This inference is not dispelled merely because the domain name also contains injury or litigation related modifiers. Indeed, as the Complainant's Supplemental Filing demonstrates, the Complainant itself registers and uses domain names touching on litigation and adverse legal contexts, including domain names associated with worker claims and securities litigation. A consumer encountering <uberhurtme.com> or <myuberlawsuit.com> cannot reliably infer from the domain name alone that the site is operated adversely to Uber rather than by Uber in connection with its own legal affairs management. The structural characteristics of domain names as origin identifiers mean that the nominative fair use doctrine translates into the domain name context only with considerable caution and only where confusion as to source or affiliation is genuinely implausible. That threshold is not met here.

A third consideration weighs against the Respondent's nominative fair use argument. Where a famous mark is incorporated into a domain name, permitting a defense of nominative fair use whenever a registrant claims to offer services relating to or directed against the mark owner would substantially undermine the Policy's protection of famous marks. Any commercial actor, whether a competing law firm, a litigation aggregator, a class action referral service, or any other enterprise with an adverse commercial interest in the mark owner, could appropriate virtually any famous mark by pairing it with sufficiently adverse or descriptive modifiers and claiming referential use. The limiting principle that prevents this result is necessity: the doctrine protects uses where the mark is the only practical means of identifying the subject matter, not uses where the registrant has chosen the mark-incorporating domain name for its commercial attractiveness rather than its descriptive indispensability. To illustrate, consider a domain name such as <[mark]poison.com>, registered by a firm offering food-safety legal services against a well-known fast-food company. Such a domain name would not be protected by nominative fair use because the registrant could equally describe its services with a domain name that does not appropriate the fast-food company's mark. The same logic applies here with equal force.

The Panel emphasizes that nothing in this Decision should be read as suggesting that individuals injured while using Complainant's services are without legal recourse, or that attorneys are prevented from advertising their services to such individuals. The Decision addresses only the narrow question of whether the Policy permits a law firm to register multiple domain names incorporating a famous trademark to attract clients with claims against the mark owner. It does not. The Respondent has ample alternative means and any number of descriptive domain names that do not incorporate the UBER mark through which it may reach and serve injured Uber passengers.

The Panel accordingly finds that the Respondent's nominative fair use argument does not establish rights or legitimate interests in the disputed domain names under the Policy.

ii. The PPC Disputed Domain Names

The remaining four disputed domain names, <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, and <uberhurtyou.com>, resolve to websites consisting primarily of blog-style posts and monetized PPC links, including links labeled "Personal Injury Lawyer" and "Vehicle Accident Claims". The Respondent characterizes these pages as registrar-generated placeholder pages that are temporary in nature and do not reflect deliberate exploitation of the Complainant's mark.

The Panel does not accept this characterization. PPC pages of this kind have been held to be incapable of establishing rights or legitimate interests in a domain name incorporating a third party's trademark. [WIPO Overview 3.1](#), section 2.9. The pages in question are not neutral parking pages of the kind that might arise incidentally from a domain name comprising dictionary terms. They are pages that feature links to personal injury legal services, the very category of commercial activity the Respondent claims to conduct and are hosted under the disputed domain names that incorporate the Complainant's famous mark.

Moreover, the Complainant's Supplemental Filing establishes that these pages of the disputed domain names remained unchanged after the Complaint was filed. The Panel rejects the Respondent's characterization of them as temporary. A respondent cannot disclaim responsibility for the content appearing on websites associated with its domain names. [WIPO Overview 3.1](#), section 3.5.

The Panel finds that the use of these four disputed domain names in connection with PPC pages does not constitute a bona fide offering of goods or services or a legitimate noncommercial or fair use of the domain names under the Policy.

Having considered all seven disputed domain names and the Respondent's arguments in their entirety, the Panel finds that the Complainant has established the second element of the Policy.

D. Registered and Used in Bad Faith

Paragraph 4(a)(iii) of the Policy requires the Complainant to establish that the disputed domain names were registered and are being used in bad faith. Paragraph 4(b) of the Policy sets out a non-exhaustive list of circumstances that, if found by the Panel to be present, shall be evidence of registration and use in bad faith. The Panel addresses the seven disputed domain names in the same two groups applied in the analysis of the second element.

i. The Pattern of Registration and the UBER Mark Fame

As a threshold matter applicable to all seven disputed domain names, the Panel notes that the UBER mark is one of the most widely recognized trademarks in the world. It has been registered in more than 91 jurisdictions, has been in continuous and prominent use for more than 15 years, and has become part of the general public lexicon. Where a respondent registers a domain name incorporating a mark of this kind, panels have held that the fame of the mark alone may give rise to a presumption of bad faith, on the ground that it is implausible that the registrant was unaware of the mark at the time of registration. [WIPO Overview 3.1](#), section 3.1.4. The Respondent does not claim, nor could it plausibly claim, ignorance

of the UBER mark at the time it registered any of the disputed domain names. To the contrary, the Respondent's own submissions confirm that the disputed domain names were registered precisely because of their association with the Complainant and its services.

The registration of the seven disputed domain names incorporating the UBER mark also constitutes a pattern of conduct within the meaning of paragraph 4(b)(ii) of the Policy, which provides that bad faith is evidenced where a respondent has registered domain names in order to prevent the owner of the trademark from reflecting the mark in a corresponding domain name, provided the respondent has engaged in a pattern of such conduct. Seven registrations spanning a period of nearly eight years, each incorporating the same famous mark and each directed at the same commercial purpose, satisfy the pattern requirement.

WhatsApp Inc. v. Moose Scheib, WIPO Case No. [D2019-0541](#).

ii. The Law Firm Domain Names

With respect to the three disputed domain names associated with the Respondent's law firm, the Panel finds bad faith registration and use on multiple grounds.

The use of <uberhurtme.com> in connection with a website that prominently and repeatedly displays the UBER mark, without disclosing the Respondent's lack of any relationship with the Complainant, constitutes an intentional attempt to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of the Respondent's website, within the meaning of paragraph 4(b)(iv) of the Policy. The commercial gain in question is the acquisition of paying legal clients. The fact that the website is directed at persons with claims against Uber rather than persons seeking Uber's own services does not eliminate the likelihood of confusion as to source or affiliation. As the panel observed in *Verizon Trademark Services LLC v. 石磊 (Shi Lei / Lei Shi)*, WIPO Case No. [D2024-1150](#), a respondent that employs the reputation of a famous mark to mislead users into visiting its domain names acts in bad faith even where the misdirection serves the respondent's own commercial purposes rather than those of the mark owner.

With respect to <injureduber.com> and <njuberlawsuit.com>, both of which redirect to the Drazin & Warshaw P.C. homepage without any specific reference to Complainant's services, the bad faith finding is equally clear. A visitor arriving at the Drazin & Warshaw homepage via either of these domain names is given no explanation of the relationship between the domain name and the website to which it resolves, no disclosure of the Respondent's non-relationship with the Complainant, and no indication that the site is operated adversely to Complainant. The use of the UBER mark in these domain names serves no purpose other than to attract Internet traffic that the Complainant's mark generates, which is precisely the kind of free riding on trademark goodwill that the Policy is designed to prevent.

iii. The PPC Disputed Domain Names

The use of a domain name incorporating a famous trademark to host monetized PPC pages featuring links to services in the same commercial category as the registrant's own business constitutes bad faith under paragraph 4(b)(iv) of the Policy. [WIPO Overview 3.1](#), section 3.5. The pages associated with <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, and <uberhurtyou.com> feature sponsored links for personal injury legal services, which is the Respondent's own line of business. The Respondent obtains a commercial benefit from the generated traffic.

The Respondent's characterization of these pages as automatically generated and temporary fails. As established in the Complainant's Supplemental Filing, the pages remained unchanged after the filing of the Complaint. A respondent cannot disclaim responsibility for content appearing on websites associated with its domain names, whether or not that content was actively placed there by the registrant. [WIPO Overview 3.1](#), section 3.5.

iv. The Offer to Sell

The pre-litigation communications between the Respondent and the Complainant provide additional and independent evidence of bad faith applicable to all seven disputed domain names.

As set out in the Factual Background, the Respondent initiated contact with the Complainant in early February 2026, disclosed a competing offer from a third-party national personal injury law firm, and ultimately proposed to sell the disputed domain names to the Complainant for USD 4.8 million. The Respondent contends that this offer was solicited by the Complainant and that a solicited offer to sell does not constitute bad faith. The Panel does not accept this characterization.

A plain reading of the parties' email exchange, which is in the record as Annex 11 to the Complaint and Annex 2 to the Response, establishes that the Respondent made the initial contact, that the Complainant's representative responded that he was not interested in making an offer, and that the Respondent proceeded to provide a term sheet for USD 4.8 million nonetheless. This sequence of events does not support the Respondent's characterization of the offer as solicited. The Complainant's expression of willingness to receive a term sheet, to the extent it can be so characterized, does not transform what was in substance an unsolicited approach into a solicited transaction that immunizes the Respondent from a bad faith finding.

The offer itself is telling. The Respondent's out-of-pocket registration costs for seven domain names registered at standard GoDaddy rates over approximately eight years would be in the range of USD 190 to USD 380. The proposed sale price of USD 4.8 million represents an increase of between approximately 12,600 and 25,000 percent over those costs. While the Respondent contends that this price reflected substantial investment in developing the associated websites, no documentation of any such investment was provided. Conclusory and self-serving assertions of investment, unsupported by invoices or other evidence, are insufficient to establish that the proposed price reflected anything other than the trademark value of the UBER mark itself. [WIPO Overview 3.1](#), section 4.2.

The Respondent's own characterization of the disputed domain names as "valuable operating assets" is instructive. Read in context, that characterization reflects the value the Respondent attributed to the domain names by virtue of their incorporation of the Complainant's famous mark, rather than any independent business value the associated websites may have generated. This is consistent with a finding of bad faith under paragraph 4(b)(i) of the Policy.

The Panel finds that the Complainant has established the third element of the Policy with respect to all seven disputed domain names.

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 <injureduber.com>, <myubercase.com>, <myuberinjury.com>, <myuberlawsuit.com>, <njuberlawsuit.com>, <uberhurtme.com>, and <uberhurtyou.com> be transferred to the Complainant.

/William F. Hamilton/
William F. Hamilton
Sole Panelist
Date: April 21, 2026