ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Host Master, Njalla Okta LLC
Case No. D2026-1729

1. The Parties

The Complainant is Scribd, Inc., United States of America ("United States") represented by IPLA, LLP, United States.

The Respondent is Host Master, Njalla Okta LLC, Saint Kitts and Nevis.

2. The Domain Names and Registrar

The disputed domain names <slidesdownloader.app> and <slidesdownloader.net> are registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on April 23, 2026. On April 23, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On the same date, 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 (Tucows Domains Inc. (Registrar) / The RDAP server redacted the value) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 24, 2026, providing the registrant and contact information disclosed by the Registrar, and requesting the Complainant to submit an amendment to the Complaint. The Complainant filed an amendment to the Complaint on April 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 April 29, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on May 20, 2026.

The Center appointed Gustavo Patricio Giay as the sole panelist in this matter on June 1, 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 Scribd, Inc., a corporation incorporated in the United States. The Complainant operates a global online platform under the SLIDESHARE brand for the publication, sharing, and discovery of presentations, documents, and similar professional content. The platform was launched in 2006, and the Complainant operates its principal website at <slideshare.net>, registered on April 4, 2006, and has used it continuously since then in connection with the SlideShare platform. According to the Complaint, the Complainant's platform hosts over 28,000,000 uploads across 40 content categories and serves over 80,000,000 professionals per month. The Complainant offers access to its content through both free and paid subscription-based services.

The Complainant is the owner of trademark registrations for the SLIDESHARE mark in multiple jurisdictions worldwide. For the purposes of this proceeding, the Panel notes in particular the following registration: United States trademark SLIDESHARE, Reg. No. 4212895, registered on September 25, 2012, for classes 9, 35, and 42. The Panel further notes that the SLIDESHARE trademark portfolio was assigned to the Complainant by its predecessor-in-interest, SlideShare, LLC. The Complainant and its predecessor-in-interest have continuously used the SLIDESHARE mark in connection with the SlideShare platform since at least 2006.

The disputed domain name <slidesdownloader.net> was registered on May 17, 2024, and the disputed domain name <slidesdownloader.app> was registered on January 1, 2026.

According to the evidence on record, both disputed domain names resolve to active websites with substantially similar layout, content, and functionality. Each website prominently displays the SLIDESHARE mark in its entirety, advertises itself as a “SlideShare Downloader” tool, and provides users with a process and instructions to copy links from the Complainant’s SlideShare platform at <slideshare.net> in order to download presentations, documents, and other materials available thereon in PDF or PPT format. The websites expressly state that the service is provided free of charge and that no subscription or registration is required, in contrast to the Complainant’s platform, where full access to certain content requires a paid subscription.

The Respondent is identified as Host Master, Njalla Okta LLC, reportedly located in Saint Kitts and Nevis. Following the Registrar verification, the registrant information disclosed for both disputed domain names was identical, including the registrant’s name, organization, postal address, telephone number, and country, differing only in the domain-specific email address associated with each disputed domain name.

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 names.

Notably, the Complainant contends that the disputed domain names are confusingly similar to its SLIDESHARE trademark, in which it claims rights on the basis of registrations in multiple jurisdictions dating back to at least 2012, as well as on continuous use since 2006. The Complainant asserts that the disputed domain names reproduce the dominant and recognizable first term “slides” of the SLIDESHARE mark, and that the addition of the descriptive term “downloader” does not prevent a finding of confusing similarity but rather reinforces the association with the Complainant. The Complainant further submits that, where a disputed domain name does not incorporate a trademark in its entirety, the content of the corresponding website may be considered to assess confusing similarity, and that in this case each website prominently displays the SLIDESHARE mark in full and advertises itself as a “SlideShare Downloader”, confirming deliberate targeting of the Complainant.

The Complainant further contends that the Respondent has no rights or legitimate interests in respect of the disputed domain names. The Complainant states that it has not authorized, licensed, or otherwise permitted the Respondent to use the SLIDESHARE mark or to register any domain name incorporating it, and that the Respondent is not commonly known by the disputed domain names. The Complainant submits that the use of the disputed domain names to provide users with tools to download copyrighted content from the Complainant’s platform, bypassing the subscription requirements that would otherwise apply, cannot constitute a bona fide offering of goods or services nor a legitimate noncommercial or fair use, and amounts to illegal activity that can never confer rights or legitimate interests on a respondent.

Moreover, the Complainant contends that the disputed domain names were registered and are being used in bad faith. The Complainant submits that the disputed domain names were registered many years after the Complainant’s trademark rights and platform became established, that the Respondent’s reproduction of the SLIDESHARE mark and its explicit references to the Complainant’s platform leave no doubt that the Respondent was aware of the Complainant at the time of registration, and that the use of the disputed domain names to enable users to bypass the Complainant’s platform access controls and obtain copyrighted content without authorization constitutes both illegal activity and an intentional attempt to attract Internet users by creating a likelihood of confusion with the SLIDESHARE mark.

Finally, the Complainant requests that the Administrative Panel order the transfer of the disputed domain names to the Complainant.

B. Respondent

The Respondent did not reply to the Complainant’s contentions.

6. Discussion and Findings

According to paragraph 4(a) of the Policy, for this Complaint to succeed in relation to the disputed domain names, the Complainant must prove each of the following, namely that:

i. the disputed domain names are identical or confusingly similar with a trademark or service mark in which the Complainant has rights; and

ii. the Respondent has no rights or legitimate interests in respect of the disputed domain names; and

iii. the disputed domain names were registered and are being used in bad faith.

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. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“WIPO Overview 3.1”), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The record shows that the Complainant is the owner of trademark registrations for the SLIDESHARE mark in multiple jurisdictions, as set out in the Factual Background above. The Complainant's registered trademark rights substantially predate the registration of the disputed domain names. The Complainant has further demonstrated continuous use of the SLIDESHARE mark in connection with its online platform since at least 2006, and the record reflects significant exposure and recognition of the mark in connection with the Complainant's goods and services.

The Panel notes that the disputed domain names incorporate the first element of the Complainant's SLIDESHARE mark, namely "slides", in combination with the descriptive term "downloader". In these circumstances, the recognizability of the Complainant's mark within the disputed domain names is informed not only by the side-by-side textual comparison, but also by the broader context in which the disputed domain names are used.

In this respect, where the assessment of confusing similarity benefits from contextual elements, panels may take into account the content of the website associated with the domain name to assess whether the respondent has targeted the complainant's mark, and such content may serve to affirm a finding of confusing similarity under the first element. See WIPO Overview 3.1, section 1.15.

In the present case, the websites associated with both disputed domain names prominently display the SLIDESHARE mark in its entirety, advertise themselves as a "SlideShare Downloader" tool, and explicitly instruct users on how to copy links from, and download content available on, the Complainant's SlideShare platform. Taken together with the use of the element "slides" as the first component of the disputed domain names, this content confirms that the disputed domain names target the Complainant and its SLIDESHARE mark, and that the element "slides" is intended to refer to, and to be perceived by Internet users as referring to, the Complainant's mark and platform rather than to the generic English word.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of the descriptive term "downloader" 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 names and the mark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

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.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving that a respondent lacks rights or legitimate interests in a domain name may result in the difficult 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 (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. WIPO Overview 3.1, section 2.1.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed 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 disputed domain names such as those enumerated in the Policy or otherwise.

The Complainant asserts that it has not authorized, licensed, or otherwise permitted the Respondent to use the SLIDESHARE mark or to register any domain name incorporating it, and that no relationship exists between the Parties. There is no evidence in the record suggesting that the Respondent has been commonly known by the disputed domain names or that the Respondent holds any trademark or other rights corresponding to them. The Registrar-disclosed information identifies the registrant as Host Master, Njalla Okta LLC, a name that bears no correspondence to the disputed domain names. WIPO Overview 3.1, section 2.3.

Furthermore, the evidence on record establishes that both disputed domain names resolve to websites that prominently display the SLIDESHARE mark in its entirety, advertise themselves as a "SlideShare Downloader" tool, and offer Internet users a step-by-step process to download presentations, documents, and other materials available on the Complainant's SlideShare platform free of charge, expressly representing that no subscription or registration is required. The Complainant has provided evidence that access to such content on its platform is otherwise subject to a paid subscription, and the Respondent's websites openly position themselves as a means to circumvent that requirement. The Respondent's services thus do not consist of any independent offering of its own, but rather of facilitating unauthorized access to, and reproduction of, content available on the Complainant's platform, in disregard of the access controls and licensing terms applicable to that content. Such conduct cannot constitute a bona fide offering of goods or services within the meaning of paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii). WIPO Overview 3.1, section 2.2.

Panels have held that the use of a domain name for illegal activity, here the unauthorized circumvention of the Complainant's access controls and the facilitation of infringement of copyrighted content available on the Complainant's platform, can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1. The Panel notes in this respect the analogous finding in *Scribd, Inc. v. ngel*, WIPO Case No. D2023-3309, where the panel held that the respondent's use of the contested domain name "to offer unauthorized access to copyrighted material available only to subscribers to the Complainant's platform amounts to fraudulent activity" and could not confer rights or legitimate interests.

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.

The record shows that the Complainant's SLIDESHARE trademark has been registered in multiple jurisdictions since 2012, and that the Complainant and its predecessor-in-interest have continuously used the SLIDESHARE mark in connection with the SlideShare platform since at least 2006. The Complainant's trademark rights therefore substantially predate the registration of the disputed domain names. Given the long-standing use of the SLIDESHARE mark, the scale of the Complainant's platform - with over 28,000,000 uploads and over 80,000,000 monthly users - and the recognition of the SLIDESHARE mark in connection with the Complainant's goods and services, the Panel considers it more likely than not that the Respondent was aware of the Complainant and its trademark at the time of registration of the disputed domain names.

This conclusion is confirmed by the content of the websites associated with the disputed domain names, which prominently display the SLIDESHARE mark in its entirety, expressly refer to the Complainant's SlideShare platform by name, and provide step-by-step instructions on how to copy links from, and download content available on, that platform. The combined choice of the element "slides" with the descriptive term "downloader" in the disputed domain names, paired with this content, leaves no doubt that the Respondent specifically had the Complainant and its SlideShare platform in mind at the time of registration, and that the disputed domain names were registered with the deliberate intention of targeting the Complainant.

The manner in which the disputed domain names are used further reinforces this finding. As established in the Factual Background and in the analysis of the second element above, the Respondent uses the disputed domain names to operate websites that offer Internet users the means to download presentations, documents, and other materials available on the Complainant's platform free of charge, expressly representing that no subscription or registration is required, in circumvention of the access controls and licensing terms applicable to that content. The Respondent's conduct is thus apt to attract Internet users searching for tools to interact with the Complainant's platform, by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the Respondent's websites and the services offered thereon. Such conduct falls squarely within paragraph 4(b)(iv) of the Policy.

Panels have held that the use of a domain name for illegal activity, here the unauthorized circumvention of the Complainant's access controls and the facilitation of infringement of copyrighted content available on the Complainant's platform, constitutes bad faith. WIPO Overview 3.1, section 3.4. The Panel notes in this respect the analogous finding in *Scribd, Inc. v. ngel*, WIPO Case No. D2023-3309, where the panel held that the respondent's use of the contested domain name "to confuse Internet users and enable them to bypass the Complainant's platform access controls amounts to fraudulent activity" and constituted bad faith under the Policy. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

The Panel finds that the Complainant has established the third element of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain names <slidesdownloader.app> and <slidesdownloader.net> be transferred to the Complainant.

/Gustavo Patricio Giay/
Gustavo Patricio Giay
Sole Panelist
Date: June 15, 2026