ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

# ADMINISTRATIVE PANEL DECISION
Reliance Industries Limited v. A P Singh, Indiacon.com
Case No. D2026-3905

## 1. The Parties

The Complainant is Reliance Industries Limited, India, represented by Ajay Sahni & Associates, India.

The Respondent is A P Singh, Indiacon.com, India, and Suresh Chaudhary, Proprietor, M/s JIOLAT Auto Gas Industries, New Delhi, India (beneficial holder and user of the Disputed Domain Name), represented by CA Dhananjay Jha, A D S G & Co., Chartered Accountants, Delhi, India.

## 2. The Domain Name and Registrar

The disputed domain name <jiolat.com> (the "Disputed Domain Name") is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (the "Registrar").

## 3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 1, 2026. On September 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On September 2, 2026, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on September 2, 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 September 3, 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 September 7, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 27, 2026. The Respondent sent an email communication to the Center on September 26, 2026, requesting extension of time to submit its Response. The Center, in accordance with paragraph 5(b) and 5(e) of the Rules, granted an extension of time until October 7, 2026. The Response was filed with the Center on October 7, 2026.

On October 13, 2026, the Complainant transmitted to the Center a supplemental filing designated as a Rejoinder. The admissibility of this filing is addressed in Section 6 below.

The Center appointed Saisunder Nedungal Vidhya Bhaskar as the sole panelist in this matter on October 13, 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

### A. The Complainant and its JIO Marks

The Complainant is part of Reliance Industries Limited Group, one of India's largest private sector conglomerates, which operates a wide range of businesses ranging from energy, petrochemicals, textiles, and retail to telecommunications.

The Complainant first adopted the trademark JIO for its telecommunications business in December 2011 and on September 5, 2016, Reliance Jio Infocomm Limited ("RJIL") launched its flagship telecom services under the JIO brand.

The Complainant owns numerous Indian trademark registrations for JIO and JIO formative marks across multiple classes. The earliest registrations for the mark JIO (Nos. 2247360 and 2247460) were secured on December 9, 2011, in Classes 9 and 38. The Complainant also holds registrations in Classes 4, 11, 12, and 37 covering CNG-related products, gas-related apparatus, fuels and allied services all applied for and registered on September 7, 2012.

The Complainant operates websites at "www.ril.com" and "www.jio.com" which describe its business offerings.

### B. The Respondent

The Respondent Suresh Chaudhary claims to be the proprietor of M/s JIOLAT Auto Gas Industries, engaged in the supply of CNG conversion kits, CNG cylinders, and periodic testing of CNG cylinders. The business has been known by the name JIOLAT since at least February 2006.

The Respondent has produced few government-issued and statutory records evidencing the usage of the term "JIO" as a part of its tradename "JIOLAT" predating the Complainant's adoption of its JIO mark.

### C. The Trade Mark Opposition Proceedings

From 2010 onwards, members of the Respondent's family incorporated companies bearing the JIOLAT name, including Jiolat Fuel Tech Private Limited.

On April 7, 2017, Jiolat Fuel Tech Private Limited, a company of the Respondent's group, of which Mr. Chaudhary is a director applied to register the trademark JIOLAT in Class 12 under Trade Mark Application No. 3520949, claiming use since May 13, 2010.

On September 21, 2017, the Complainant filed Opposition No. 901044 against Application No. 3520949 before the Indian Trademarks Registry.

The Complainant's opposition was held to be abandoned owing to procedural delays from the Complainant, and the Application No. 3520949 was directed to proceed to registration.

Twelve days later, on September 1, 2026, the Complainant filed the present Complaint.

The Disputed Domain Name was registered on November 24, 2022, to host the JIOLAT Auto Gas Industries business website. The registrant of record is Mr. A P Singh of Indiacon.com, who acted as nominee for the firm on instructions from Mr. Chaudhary. The website describes the firm's CNG conversion kits, cylinders, and testing services.

## 5. Parties' Contentions

### A. Complainant

The Complainant contends that the Disputed Domain Name is confusingly similar to its well-known JIO trademark, as it incorporates JIO as its leading and dominant element. The Complainant submits that the Respondent has no rights or legitimate interests in the Disputed Domain Name, relying on: the status of JIOLAT-named companies as struck off; the abandonment of Trade Mark Application No. 3742661; and the display on the website of expired ISO certificates and the photographs of alleged non-associated individuals. The Complainant asserts that the Disputed Domain Name was registered and is being used in bad faith, pointing to the 2022 registration date after the JIO mark had become well known, the overlap in the parties' businesses (fuels, CNG, mobility), and the alleged mala fide intention to misappropriate the JIO brand.

### B. Respondent

The Respondent submits that this is not a case of cybersquatting. The Respondent accepts that the Complainant owns registrations for JIO but contends that JIOLAT is a single invented six-letter word and is not confusingly similar to JIO.

The Respondent's principal defence rests on the second and third elements. The Respondent's business has been known as JIOLAT since 2006 under documented governmental authorizations, predating both the Complainant's adoption of JIO in December 2011 and its commercial launch of JIO services in September 2016. The Disputed Domain Name reproduces the firm's own established trade name. The Respondent, through its company Jiolat Fuel Tech Private Limited, also holds Trade Mark Registration No. 3520949 for JIOLAT in Class 12, registered after the Complainant's opposition was held abandoned by the Indian Trademarks Registry.

The Respondent denies bad faith, noting that the name JIOLAT was adopted long before the JIO mark had any existence or fame. The website does not use the Complainant's logo or trade dress, no actual confusion has ever been documented, and the domain has never been offered for sale.

The Respondent further submits that the Complaint constitutes Reverse Domain Name Hijacking (RDNH), given that: (a) the Complainant has known of the JIOLAT business since at least September 2017 through the opposition proceedings; (b) the Complainant's own IP Counsel acknowledged the JIOLAT documents in a sworn affidavit in 2018; (c) the Complaint was filed twelve days after the Complainant's opposition was abandoned and the mark "JIOLAT" was registered, without disclosing any of these facts; and (d) the Complaint falsely stated that there was no JIOLAT trademark registration.

## 6. Preliminary Issue: Admissibility of Complainant's Supplemental Filing

On October 13, 2026, the Complainant transmitted to the Center a filing designated as a Rejoinder. The Respondent has not been given an opportunity to comment on the admissibility of this filing.

Under paragraph 12 of the Rules, the Panel may, in its sole discretion, request further statements or documents from the parties. Neither the Rules nor the WIPO Supplemental Rules grant parties a right to file unsolicited supplemental submissions. The Panel has not invited any such filing in this proceeding.

Section 4.6 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions, ("WIPO Overview 3.1") states that unsolicited supplemental filings are generally not accepted by panels, unless the party submitting

or requesting to submit an unsolicited supplemental filing clearly shows its relevance to the case and why it was unable to provide the information contained therein in its complaint or response (e.g., owing to some unforeseen or exceptional circumstance).

The Panel has reviewed the Rejoinder. It consists of 15 pages and is divided into Preliminary Submissions and a Para-Wise Reply to each paragraph of the Response. Having reviewed its contents, the Panel finds that the Rejoinder does not meet the threshold for admission for the following reasons:

First, the vast majority of the Rejoinder reiterates and re-argues points already made in the original and amended Complaint. No genuinely new facts or evidence are presented that could not, with reasonable diligence, have been included in the original Complaint.

Second, the Complainant's sole response on the critical issue of the undisclosed trademark opposition proceedings (paragraph 11 of the Rejoinder) is that the abandonment order of August 20, 2026 "does not constitute an adjudication on the substantive merits". This is not a new factual matter; it is a legal characterization of a known event.

Third, admission of the Rejoinder at this stage after the Panel has been appointed would potentially prejudice the Respondent, who has not had an opportunity to file a counter to the supplemental submission and who has made clear arguments regarding the undisclosed proceedings that the Complainant is now seeking to address for the first time.

The Panel therefore declines to admit the Complainant's Rejoinder dated October 13, 2026, into the record of these proceedings. The Panel has decided this case on the basis of the Complaint (as amended), the Response, and the supporting annexures.

## 7. Discussion and Findings

Paragraph 4(a) of the Policy requires the Complainant to prove all three of the following elements:

(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 Panel accepts that the Complainant has well-established rights in the trademark JIO. The mark has been registered in India since 2011, holds numerous registrations across multiple classes including Classes 4, 11, 12, and 37 from 2012, and has been declared a well-known mark by an Indian Court (Bombay High Court) and the Indian Trade Marks Registry.

The Disputed Domain Name incorporates the mark JIO in its entirety as the initial three letters of the six-letter word JIOLAT. The top-level domain ".com" is disregarded in this assessment, as it is a standard registration requirement. See WIPO Overview 3.1, section 1.11.

Under the UDRP, the first element analysis functions as a standing or threshold test. The test for confusing similarity is not concerned with whether actual confusion has occurred, or with the likelihood of such confusion in the marketplace. The comparison is made between the dominant component of the trademark and the Disputed Domain Name.

The mark JIO is recognizable within the Disputed Domain Name. Consistent with WIPO Overview 3.1, section 1.8, the addition of the letters "lat" does not prevent a finding of confusing similarity at the threshold level. The Panel notes that the Respondent itself acknowledges that "panels treat the first element as a threshold test" and that it rests its case principally on the second and third elements.

The Panel finds that the first element under paragraph 4(a)(i) of the Policy is established. The Disputed Domain Name is confusingly similar to the Complainant's JIO trademark.

**B. Rights or Legitimate Interests**

Under paragraph 4(a)(ii) of the Policy, the Complainant must establish that the Respondent has no rights or legitimate interests in the Disputed Domain Name. Once the Complainant establishes that the respondent lacks rights or legitimate interests in the domain name, the burden shifts to the respondent to come forward with evidence demonstrating rights or legitimate interests.

Even assuming the Complainant has made a prima facie case based on the confusing similarity of the Disputed Domain Name to JIO and the overlap in business fields, the Panel finds that this prima facie case is rebutted by the Respondent's evidence.

WIPO Overview 3.1, section 2.2, confirms that prior use of a name corresponding to the domain name before notice of the dispute, supports a finding of rights and legitimate interests in such domain name where the use by the respondent is bona fide.

The Respondent has placed on record substantial, government-issued documentary evidence demonstrating that M/s JIOLAT Auto Gas Industries has used the name JIOLAT in connection with its business since at least February 2006 which is almost six years before the Complainant first adopted the JIO mark in December 2011 and more than a decade before any JIO service was commercially available.

The Disputed Domain Name was registered in November 2022 to host the business website of M/s JIOLAT Auto Gas Industries and describes precisely those goods and services. The Disputed Domain Name reproduces the Respondent's own established trade name without any addition to it. There is no evidence that it has been used for any purpose other than promoting the Respondent's business.

The business of JIOLAT Auto Gas Industries is carried on not by any of the incorporated entities but by Mr. Suresh Chaudhary as a proprietor, who has used the JIOLAT name since 2006. The status of separately incorporated companies bearing the JIOLAT name does not affect the underlying legitimacy of the proprietorship's own long-standing use of that name. The Panel notes that the Companies Act proceedings concerned the corporate name of a distinct legal entity -- JIOLAT Automative India Private Limited -- under a different statute and a different legal test. Those proceedings neither involved the proprietorship M/s JIOLAT Auto Gas Industries nor had any bearing on the trademark or the Disputed Domain Name. Similarly, the abandonment of trademark applications in other classes is not germane to the present dispute. As for the state of the Respondent's website, the Panel finds that the currency or completeness of a business website does not bear on the legitimacy of an underlying trading name that has been documented for nearly twenty years. These factors, relied upon by the Complainant, do not displace the Respondent's established rights.

The Panel further notes that Trade Mark Registration No. 3520949 for JIOLAT in Class 12 was issued on August 21, 2026, eleven days before this Complaint was filed. This registration was applied for in 2017, five years before the Disputed Domain Name was registered, and was granted after a contested opposition by the Complainant was abandoned.

The Panel finds that the Respondent has established rights and legitimate interests in the Disputed Domain Name within the meaning of paragraph 4(a)(ii) of the Policy. The Panel finds the second element of the Policy has not been established.

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

Given the Panel's findings in relation to the second element of the Policy, it is not necessary to consider the third element of the Policy.

**D. Reverse Domain Name Hijacking**

The Respondent has requested a finding of Reverse Domain Name Hijacking (RDNH) under paragraph 15(e) of the Rules.

WIPO Overview 3.1, section 4.16, identifies circumstances in which RDNH may be found, including where: the complainant knew it could not succeed under any fair interpretation of the facts available prior to filing; the complaint was filed to try to deprive a respondent of a domain name to which it had a legitimate claim; or the complainant deliberately omitted material facts from the complaint.

Having considered all the circumstances of this case, the Panel finds that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding for the following cumulative reasons:

(a) The Complainant knew or should have known it could not succeed under any fair interpretation of the facts.

The Complainant had known of the JIOLAT business and its claim of prior use when it filed its own opposition against Trade Mark Application No. 3520949. The Complainant therefore had actual knowledge of the Respondent's usage claim of the trade name "JIOLAT" at least since 2010. A complainant that is aware of a respondent's pre-existing, business use of its trade name and nonetheless proceeds with a UDRP complaint cannot claim to have had a plausible basis for believing it could succeed on the second and third elements.

(b) The Complainant deliberately failed to disclose material facts.

The existence and outcome of the opposition proceedings and the resulting registration were known to the Complainant at the time of filing. Their non-disclosure deprived the Panel of material information directly relevant to the question of whether the Respondent had rights or legitimate interests and to the RDNH question.

(c) The Complainant had already pursued the Respondent's JIOLAT name through a trade mark opposition under the Indian Trademarks Act. The opposition (No. 901044) was held abandoned on August 20, 2026, after the Complainant failed to file its evidence affidavit in time. Twelve days later, the Complainant filed this Complaint. WIPO Overview 3.1, section 4.16, expressly identifies the use of the UDRP to obtain what a complainant could not obtain through other proceedings as a factor indicative of RDNH. This is precisely such a case.

In *Nalli Chinnasami Chetty v. Anthony Nalli*, WIPO Case No. D2019-2642, the panel found RDNH where the complainant "clearly ought to have known it could not succeed under any fair interpretation of facts reasonably available prior to the filing". In *Bigfoot Ventures LLC v. Shaun Driessen*, WIPO Case No. D2016-1330, the panel found RDNH where the complainant "should have known" it could not prove the required elements on the facts available to it.

The Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

**8. Decision**

For the foregoing reasons, the Panel orders that the Complaint is denied.

The Panel further declares that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

*/Saisunder Nedungal Vidhya Bhaskar/*
**Saisunder Nedungal Vidhya Bhaskar**
Sole Panelist
Date: October 28, 2026