

ADMINISTRATIVE PANEL DECISION

Sealed Air Corporation (US) v. Mark Kamal, Peter Grant, and Alana Snyder
Case No. D2025-0894

1. The Parties

Complainant is Sealed Air Corporation (US), United States of America (“United States”), represented by Nelson Mullins Riley & Scarborough LLP, United States.

Respondents are Mark Kamal, United States, Peter Grant, United States, and Alana Snyder, United States.

2. The Domain Names and Registrar

The disputed domain names <sealedairorders.com>, <sealedairpurchasing.com>, <sealedairpurchasings.com>, and <sealedairs purchasing.com> (the “Disputed Domain Names”) are registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 4, 2025, in respect of the Disputed Domain Names <sealedairorders.com>, <sealedairpurchasing.com>, and <sealedairs purchasing.com>. On March 5, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with these Disputed Domain Names. On March 6, 2025, the Registrar transmitted by email to the Center its verification response, disclosing registrant and contact information for the Disputed Domain Names <sealedairorders.com>, <sealedairpurchasing.com>, and <sealedairs purchasing.com> which differed from the named Respondent (Redacted for Privacy / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint.

The Center sent an email communication to Complainant on March 7, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting Complainant to either file separate complaint for the Disputed Domain Names associated with a different underlying registrant or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. Complainant filed an amended Complaint on March 11, 2025.

On March 11, 2025, the Center received an email communication from Complainant requesting that the Disputed Domain Name <sealedairpurchasings.com> be added to the current proceedings. On March 14, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the additional Disputed Domain Name. On March 14, 2025, the Registrar transmitted by email to the Center

its verification response, disclosing registrant and contact information for the additional Disputed Domain Name. The Center sent an email communication to Complainant on March 19, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amended Complaint. Complainant filed a second amended Complaint on March 21, 2025.

The Center verified that the Complaint together with the amended Complaints 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 Respondents of the Complaint, and the proceedings commenced on March 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was April 16, 2025. Respondents did not submit any response. Accordingly, the Center notified Respondents' default on April 17, 2025.

The Center appointed Richard W. Page as the sole panelist in this matter on April 25, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

Complainant is a global leading provider of food safety and security, and of product protection solutions and equipment in North America, South America, Europe, the Middle East, Africa, and the Asia Pacific. Complainant is headquartered in the United States. Complainant serves a diverse global customer base with a sales and distribution network reaching 115 countries and territories. Complainant operates in the United States and 45 other countries worldwide through Complainant's various subsidiary corporations.

Complainant is the owner of the SEALED AIR mark and owns, without limitation, the following uncontestable United States federal trademark registrations (the "SEALED AIR Mark"):

United States Registration No. 925,912 for SEALED AIR registered December 21, 1971, in international class 16;

United States Registration No. 1,580,890 for SEALED AIR registered February 6, 1990, in international classes 1, 3, 7, 16, 17, and 22;

United States Registration No. 2,534,715 for SEALED AIR registered January 29, 2002, in international class 17.

In addition, Complainant owns trademark registrations for the SEALED AIR Mark in numerous jurisdictions around the world, including without limitation, Australia, Brazil, the European Union, Israel, Japan, New Zealand, Republic of Korea, Russian Federation, South Africa, and the United Kingdom.

Complainant also owns the <sealedair.com> domain name.

The Disputed Domain Names were registered on the following dates: <sealedairpurchasing.com> on January 20, 2025; <sealedairspurchasing.com> on February 18, 2025; <sealedairorders.com> on February 26, 2025; and <sealedairpurchasings.com> on March 3, 2025.

The Disputed Domain Name <sealedairpurchasings.com> resolves to a parked landing page featuring pay-per-click links, at least some of which offering identical or related services to Complainant's. The remaining Disputed Domain Names <sealedairorders.com>, <sealedairpurchasing.com>, and <sealedairspurchasing.com> do not resolve to any active websites.

In addition, Respondents have created mail exchange (“MX”) files for at least the Disputed Domain Name <sealedairpurchasing.com> to enable the sending of emails. Further, the email address associated with the Disputed Domain Name <sealedairpurchasing.com> has been used to facilitate a fraudulent email scheme attempting to defraud suppliers by posing as an employee of Complainant.

5. Parties’ Contentions

A. Complainant

Complainant contends that as a result of its extensive, continuous, and substantial investment in and use of the SEALED AIR Mark in commerce, the SEALED AIR Mark has acquired a substantial amount of reputation and goodwill in the marketplace, which consumers recognize as belonging exclusively to Complainant.

Complainant further contends that it obtained common law rights in the SEALED AIR Mark dating back to at least as early as 1963, the date of first use claimed in Complainant’s earliest federal trademark registration for the SEALED AIR Mark in the United States. Subsequently, Complainant obtained its first United States federal trademark registration for the SEALED AIR Mark on December 21, 1971. In addition, Complainant’s three United States federal trademark registrations listed above are incontestable.

Complainant further contends that each of the Disputed Domain Names contains the entirety of the SEALED AIR Mark and are thus deemed confusingly similar under the Policy. Complainant further contends that (1) the addition of words inherently connected to the operation of Complainant’s business, such as “purchasing”, “purchasings”, and “orders” combined with the SEALED AIR Mark to form the Disputed Domain Names and/or (2) the insertion of the letter “s” does not prevent a finding the Disputed Domain Names are confusingly similar to the SEALED AIR Mark.

Complainant submits that there is nothing in this record indicating that Respondents are commonly known by the Disputed Domain Names.

Complainant further submits that Respondents’ registration of the Disputed Domain Names was done intentionally to capitalize on the reputation and goodwill associated with the SEALED AIR Mark as evidenced by Respondents’ use of the Disputed Domain Name <sealedairpurchasing.com> to host an email address used in an attempt to defraud suppliers by posing as an apparent employee of Complainant and requesting a line of credit or a loan with which Respondent would then be able to purchase products from the supplier with no intent on actually paying back the credit line or loan.

Complainant further submits that Respondents have demonstrated a pattern of using domain names confusingly similar to Complainant’s SEALED AIR Mark and using them in connection with vendor credit procurement scams. Respondent Peter Grant targeted Complainant in the past with an identical scam and the UDRP panel in that proceeding ruled in Complainant’s favor. (*Sealed Air Corporation (US) v. Peter Grant*, WIPO Case No. [D2024-4381](#)). Complainant further alleges that such activities constitute phishing and impersonation.

Complainant alleges that this pattern of activity constitutes bad faith under the Policy.

Complainant further alleges that this same pattern of activity shows knowledge of Complainant’s rights in the SEALED AIR Mark at the time of registration of the Disputed Domain Names which is further evidence of bad faith.

Complainant further alleges that Respondents have used false identities to conceal their true identity which is further evidence of bad faith.

Complainant further alleges that Respondents’ failure to respond to the cease-and-desist letter is further evidence of bad faith.

The Complainant contends that it has satisfied each of the three essential elements required under the Policy for a transfer of the Disputed Domain Names.

B. Respondents

Respondents did not reply to Complainant's contentions.

6. Discussion and Findings

6.1 Consolidation: Multiple Respondents

The first and second amended Complaints were filed in relation to nominally different domain name registrants. Complainant asserts that the domain name registrants are the same entity or mere alter egos of each other, or under common control. Complainant requests the consolidation of the disputes against the multiple Disputed Domain Names registrants pursuant to paragraph 10(e) of the Rules.

The Disputed Domain Name registrants did not comment on Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing Complainant's request, the Panel will consider whether (i) the Disputed Domain Names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards common control, Complainant asserts that it submitted a request to obtain partial disclosure of the registrant data for the Disputed Domain Name <sealedairpurchasing.com> which identified the registrant as an apparent individual named "Peter Grant". This is the same registrant behind the domain name <sealedairsales.com> which was the subject of a successful UDRP challenge in the case *Sealed Air Corporation (US) v. Peter Grant*, WIPO Case No. [D2024-4381](#). In this matter, the domain name was used in connection with a scam where the registrant impersonated an alleged employee of Complainant and emailed suppliers requesting credit to make supply purchases. Upon learning of this connection between the current Disputed Domain Name <sealedairpurchasing.com> and the prior <sealedairsales.com> domain name, Complainant sent a cease-and-desist letter to Respondent Peter Grant on February 7, 2025. Complainant has not received a response to the cease-and-desist letter.

On February 18, 2025, Respondent Peter Grant used the Disputed Domain Name <sealedairpurchasing.com> and resumed the impersonation scam that he was previously operating using the <sealedairsales.com> domain name. On that same day, Complainant was alerted to the registration of the Disputed Domain Name <sealedairspurchasing.com>. Subsequently, on February 26, 2025, Respondents registered the Disputed Domain Name <sealedairorders.com>. On March 3, 2025, Respondents registered the Disputed Domain Name <sealedairpurchasings.com>. Respondents have associated mail servers to the Disputed Domain Name <sealedairpurchasings.com>. This Disputed Domain Names is currently resolving to a parked landing page featuring a pay-per-click advertisement for third-party products identical and related to Complainant's own products. Complainant has not authorized or licensed Respondent to use the SEALED AIR Mark.

Complainant requests that the four Disputed Domain Names be consolidated into these proceedings. Complainant asserts that Mark Kamal, Peter Grant, and Alana Snyder are merely false registrant names that the true underlying registrant is utilizing to hide his/her/its actual identity, and that the registrant of the Disputed Domain Names is one and the same or is part of a concerted effort and that the Disputed Domain Names are under common control. In support of this claim, Complainant further asserts that the most important fact connecting Peter Grant and Mark Kamal is the relationship between the Disputed Domain

Names <sealedairpurchasing.com> and <sealedairspurchasing.com>. Complainant sent a cease-and-desist letter to Peter Grant on February 7, 2025, wherein Complainant called out the common registration by Peter Grant of Disputed Domain Names <sealedairpurchasing.com> and <sealedairsales.com>. Subsequently on February 18, 2025, the Disputed Domain Name <sealedairspurchasing.com> was registered using a different alias and then subsequent to that registration Mark Kamal registered <sealedairorders.com>.

Complaint further asserts that this change in aliases occurred because of Complainant's cease-and-desist letter as Respondents have been operating as Peter Grant since at least as early as July 2, 2024, when they registered the <sealedairsales.com> domain name. Complainant further asserts that Respondent was tipped off to the fact that Complainant now was aware of the Peter Grant and Mark Kamal false identities. Complainant further asserts that Respondent then adopted Alana Snyder as yet a third false identity to continue to try and hide his/her/its true underlying identity. This pattern of swapping false identities, combined with the remaining facts, shows a common thread between the Disputed Domain Names and warrants consolidation.

Complainant further asserts that the facts as set forth above demonstrate a common naming convention utilized between the allegedly distinct registrants, namely, combining the SEALED AIR Mark or a misspelling of the SEALED AIR Mark with a term related to sales (e.g., purchasing, purchasings, and orders). Furthermore, all of the Disputed Domain Names were registered via the same Registrar and all within a short time period, namely between January 20, 2025, and March 3, 2025, and were associated with the same nameservers. Complainant further asserts that the facts above establish that it is more likely than not the Disputed Domain Names are under common control of a single individual or entity that is utilizing multiple aliases to conceal and protect his/her/its true identity in order to better enable them to continue to perpetrate the scams. Thus consolidation is warranted under the circumstances.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Disputed Domain Names registrants (referred to below as "Respondent") into a single proceeding.

6.2 Substantive Matters

Paragraph 15(a) of the Rules instructs the Panel as to the principles the Panel is to use in determining the dispute: "A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules, and any rules and principles of law that it deems applicable."

Even though Respondent has failed to file a Response or to contest Complainant's assertions, the Panel will review the evidence proffered by Complainant to verify that the essential elements of the claims are met. [WIPO Overview 3.0](#), section 4.3.

Paragraph 4(a) of the Policy directs that Complainant must prove each of the following three essential elements:

- i) that the Disputed Domain Names registered by Respondent are identical or confusingly similar to the SEALED AIR Mark in which Complainant has rights; and,
- ii) that Respondent has no rights or legitimate interests in respect of the Disputed Domain Names; and,
- iii) that the Disputed Domain Names have been registered and are being used in bad faith.

A. Identical or Confusingly Similar

[WIPO Overview 3.0](#), section 1.2.1 states that registration is prima facie evidence of Complainant having enforceable rights in the SEALED AIR Mark.

Complainant has shown rights in respect of the SEALED AIR Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

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 SEALED AIR Mark and the Disputed Domain Names. [WIPO Overview 3.0](#), section 1.7.

The Panel finds the SEALED AIR Mark is recognizable within the Disputed Domain Names. Accordingly, the Disputed Domain Names are confusingly similar to the SEALED AIR Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel further finds that the addition of the terms “purchasing” and “orders” and/or the insertion of the letter “s” in the Disputed Domain Names do not preclude a finding of confusing similarity.

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 three nonexclusive circumstances in which Respondent may demonstrate rights or legitimate interests in the Disputed Domain Names:

- (i) before any notice to you [Respondent] of the dispute, your use of, or demonstrable preparations to use, the Disputed Domain Names or a name corresponding to the Disputed Domain Names in connection with a bona fide offering of goods or services; or
- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Disputed Domain Names, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Disputed Domain Names, without intent for commercial gain to misleadingly divert consumers or to tarnish the SEALED AIR Mark.

Although the overall burden of proof in UDRP proceedings is on Complainant, panels have recognized that proving Respondent lacks rights or legitimate interests in the Disputed Domain Names may result in the difficult task of “proving a negative”, requiring information that is often primarily within the knowledge or control of Respondent. As such, where Complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Names (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Names. Respondent has not rebutted 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.

Panels have held that the use of the Disputed Domain Name for illegitimate activity, here claimed as phishing and impersonation, can never confer rights or legitimate interests on Respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets forth four nonexclusive criteria for Complainant to show bad faith registration and use of the Disputed Domain Names:

- (i) circumstances indicating that you [Respondent] have registered or you have acquired the Disputed Domain Names primarily for the purpose of selling, renting, or otherwise transferring the Disputed Domain Names registrations to Complainant who is the owner of the SEALED AIR Mark or to a competitor of Complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the Disputed Domain Names; or
- (ii) you [Respondent] have registered the Disputed Domain Names in order to prevent the owner of the SEALED AIR Mark from reflecting the SEALED AIR Mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or
- (iii) you [Respondent] have registered the Disputed Domain Names primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the Disputed Domain Names, you [Respondent] have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the SEALED AIR Mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product on your website or location.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that the Disputed Domain Names were registered and used in bad faith, but other circumstances may be relevant in assessing whether Respondent's registration and use of the Disputed Domain Name is in bad faith.

[WIPO Overview 3.0](#), section 3.2.1.

The Panel finds that Respondent had knowledge of Complainant's rights in the SEALED AIR Mark when he/she/it registered the Disputed Domain Names which is another element of bad faith. [WIPO Overview 3.0](#), section 3.2.2.

Panels have held that the use of the Disputed Domain Names for illegitimate activity, here claimed as phishing and impersonation constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

In addition, the Panel finds that Respondent's attempt to hide his/her/its identity in the circumstances of this case, supports an inference of bad faith. [WIPO Overview 3.0](#), section 3.6.

Having reviewed the record, the Panel finds Respondent's registration and use of the Disputed Domain Names constitutes bad faith under the Policy. The non-use of some of the Disputed Domain Names does not prevent a finding of bad faith under the circumstances of these proceedings.

The Panel finds that 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 <sealedairorders.com>, <sealedairpurchasing.com>, <sealedairpurchasings.com>, and <sealedairpurchasing.com> be transferred to Complainant.

/Richard W. Page/

Richard W. Page

Sole Panelist

Date: May 1, 2025