

## ADMINISTRATIVE PANEL DECISION

Williams-Sonoma, Inc. v. Bee Seth Seth; 博思云科技（浙江）有限公司 (Boss Cloud Technology (Zhejiang) Co., Ltd.); junhao luo; and ren wei  
Case No. D2025-1227

### 1. The Parties

The Complainant is Williams-Sonoma, Inc., United States of America (“United States”), represented by Hanson Bridgett LLP, United States.

The Respondents are Bee Seth Seth, United States; 博思云科技（浙江）有限公司 (Boss Cloud Technology (Zhejiang) Co., Ltd.), China; junhao luo, Hong Kong, China; and ren wei, China.

### 2. The Domain Names and Registrars

The disputed domain name <us-williams-sonoma.com> is registered with Xiamen ChinaSource Internet Service Co., Ltd. The disputed domain name <williams-sonoma-shop.com> is registered with NameSilo, LLC. The disputed domain name <williams-sonomas-us.com> is registered with Dominet (HK) Limited. The disputed domain name <williamssonoma-usa.shop> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com.

Xiamen ChinaSource Internet Service Co., Ltd, NameSilo, LLC, Dominet (HK) Limited, and PDR Ltd. d/b/a PublicDomainRegistry.com are individually and collectively referred to below as the “Registrar”.

### 3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on March 25, 2025 regarding the disputed domain names <us-williams-sonoma.com>, <williams-sonoma-shop.com>, and <williams-sonomas-us.com>. On March 26, and March 28, 2025, the Center transmitted by emails to the Registrar requests for registrar verification in connection with these disputed domain names. On March 26, March 27, and March 31, 2025, the Registrar transmitted by email to the Center its verification responses disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Domain Administrator, See PrivacyGuardian.org; Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication in Chinese and English to the Complainant on April 1, 2025 with the registrant and contact information of nominally different underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or, alternatively, demonstrate that the underlying registrants are in fact the

same entity and/or that all disputed domain names are under common control. On April 3, 2025, the Complainant requested to add another disputed domain name <williamssonoma-usa.shop> to the proceeding. On April 3, 2025, the Center transmitted by email to the Registrar request for registrar verification in connection with the additional disputed domain name. On April 4, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names that differed from the named Respondent (Domain Administrator, See PrivacyGuardian.org; Redacted for Privacy) and contact information in the Complaint.

The Center sent an email communication in Chinese and English to the Complainant on April 4, 2025 with the registrant and contact information of nominally different underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or, alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all disputed domain names are under common control. The Complainant filed an amended Complaint in English on April 10, 2025.

On April 4, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for one disputed domain name (<us-williams-sonoma.com>) is Chinese. On April 10, 2025, the Complainant confirmed its request that English be the language of the proceeding. The Respondents did not submit any comment on the language of the proceeding.

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 Respondents in Chinese and English of the Complaint, and the proceedings commenced on April 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 5, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on May 11, 2025.

The Center appointed Matthew Kennedy as the sole panelist in this matter on May 18, 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**

The Complainant is a United States-based home goods retailer and manufacturer. It offers a wide range of goods from kitchenware to furniture, using various brands. The Complainant holds multiple trademark registrations, including the following:

- United States trademark registration number 2,353,758 for WILLIAMS SONOMA, registered on May 30, 2000, with a claim of first use in commerce on September 16, 1956, specifying services in class 35;
- United States trademark registration number 2,442,099 for WILLIAMS SONOMA, registered on April 10, 2001, with a claim of first use in commerce in 1963, specifying goods in class 21; and
- European Union trademark registration number 011728631 for WILLIAMS-SONOMA, registered on September 12, 2013, specifying goods and services in multiple classes.

The above trademark registrations are current. The Complainant offers its goods through retail stores, mail order catalogs and, since at least 1997, an online shop at a website associated with the domain name <williams-sonoma.com>. The Complainant’s online shop prominently displays the WILLIAMS SONOMA mark and offers for sale a wide range of home goods. Certain pages on the site feature the tagline “New & Only at Williams Sonoma”.

The Respondents are identified in the Registrar's Whois database as various individuals and a company. The disputed domain names were registered on the following dates in the following registrant names:

| Date           | Disputed Domain Name       | Registrant name  |
|----------------|----------------------------|--|
| March 2, 2025  | <williams-sonomas-us.com>  | junhao luo   |
| March 10, 2025 | <williams-sonoma-shop.com> | Bee Seth Seth  |
| March 14, 2025 | <us-williams-sonoma.com>   | 博思云科技（浙江）有限公司 (Boss Cloud Technology (Zhejiang) Co., Ltd.) |
| March 27, 2025 | <williamssonoma-usa.shop>  | ren wei  |

The disputed domain names resolve to very similar websites that mimic the Complainant's website. The websites prominently display the WILLIAMS SONOMA mark and offer for sale a wide range of home goods. Product photographs are identical to those on the Complainant's website. Certain pages feature the tagline "New & Only at Williams Sonoma". Prices are displayed in USD and are heavily discounted.

## 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 WILLIAMS SONOMA mark.

The Respondents have no rights or legitimate interests in respect of the disputed domain names. The Respondents are not affiliated with the Complainant, and the Complainant has not licensed or permitted the Respondents to use the WILLIAMS SONOMA mark or any other mark or any domain names incorporating them.

The disputed domain names have been registered and are being used in bad faith. The Respondents have registered and are using the disputed domain names in bad faith by impersonating the Complainant's online store.

### B. Respondents

The Respondents did not reply to the Complainant's contentions.

## 6. Discussion and Findings

### 6.1 Preliminary Issues

#### A. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

The disputed domain name registrants did not comment on the 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 the Complainant's

request, the Panel will consider whether (i) the disputed domain names or associated 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, the Panel notes that the disputed domain names were all created within less than a month of each other, and all resolve to very similar websites with much content that is identical. These circumstances give rise to the inference that the different disputed domain names and associated websites are under common control.

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 name registrants (referred to below separately and collectively as “the Respondent”) in a single proceeding.

## **B. Language of the Proceeding**

The language of the Registration Agreement for the disputed domain name <us-williams-sonoma.com> is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint and amended Complaint were filed in English. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that English is the Complainant’s language, the websites associated with all the disputed domain names are in English, and the Registration Agreements for three disputed domain names are in English, all of which indicates that the Respondent is able to understand that language.

Despite the Center sending an email regarding the language of the proceeding, and the notification of the Complaint, in both English and Chinese, the Respondent did not make any submission with respect to the language of the proceeding or express any interest in otherwise participating in this proceeding.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties’ ability to understand and use the proposed language, time, and costs. See [WIPO Overview 3.0](#), section 4.5.1.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English.

## **6.2 Substantive Issues**

Paragraph 4(a) of the Policy provides that a complainant must demonstrate each of the following elements with respect to each disputed domain name:

- (i) the disputed domain name is identical or confusingly similar to 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 name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

The burden of proof of each element is borne by the Complainant.

## **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. See [WIPO Overview 3.0](#), section 1.7.

The Complainant has shown registered rights in respect of a WILLIAMS SONOMA mark and a WILLIAMS-SONOMA mark (with a hyphen) for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.2.1.

Three disputed domain names incorporate the WILLIAMS-SONOMA mark (with a hyphen) and one incorporates the WILLIAMS SONOMA mark (without a hyphen). The addition or omission of a hyphen between the two names "Williams" and "Sonoma" is in any event a minor difference that does not prevent a finding of confusing similarity with either mark. The disputed domain names add other elements, variously, a possessive "s", a geographic term "us" or "usa" (meaning "United States"), the word "shop", or some combination of these elements. Despite these additions, the Panel finds that both marks are recognizable within all four disputed domain names. The only additional element in the disputed domain names is a generic Top-Level Domain ("gTLD") extension (either ".com" or ".shop"). Accordingly, all the disputed domain names are confusingly similar to both the Complainant's marks for the purposes of the Policy. See [WIPO Overview 3.0](#), sections 1.7, 1.8, and 1.11.1.

Therefore, 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 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. See [WIPO Overview 3.0](#), section 2.1.

In the present case, the disputed domain names are merely composed of one or other of the Complainant's marks (in one case with an added possessive "s") and either a geographic reference to the country where the Complainant is based (i.e., the United States) or a word describing the Complainant's website (i.e., "shop"), all creating a heightened risk of implied affiliation with the Complainant. All four disputed domain names resolve to very similar websites that mimic the Complainant's own website and purport to offer for sale identical goods. The Complainant has confirmed that the Respondent is not affiliated with itself, and that it has not licensed or permitted the Respondent to use the WILLIAMS SONOMA mark or any other mark. These circumstances indicate that the Respondent is not using the disputed domain names in connection with a bona fide offering of goods or services. Nor is it making a legitimate noncommercial or fair use of the disputed domain names. Moreover, prior UDRP panels have held that the use of a domain name for illegitimate activity, in this case, impersonation or passing off, can never confer rights or legitimate interests on a respondent. See [WIPO Overview 3.0](#), section 2.13.1.

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.

Based on the record, 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 fourth of these is as follows:

“(iv) by using the [disputed] domain name, [the respondent has] intentionally attempted to attract, for commercial gain, Internet users to [the respondent’s] web site or other on-line location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of [the respondent’s] web site or location or of a product or service on [the respondent’s] web site or location.”

The disputed domain names were all registered in 2025, years after the registration of the Complainant’s marks. The Complainant’s marks are composed of two names (with or without a hyphen between them) and have no other apparent meaning than as a reference to the Complainant and its products. The disputed domain names incorporate one or other of the Complainant’s marks exactly and resolve to websites that mimic the Complainant’s website and reproduce content from that website. In view of these circumstances, the Panel finds that the Respondent registered the disputed domain names with the Complainant and its marks in mind.

As regards use, the disputed domain names operate by attracting Internet users searching for the Complainant’s website and diverting them to the Respondent’s websites where the Respondent impersonates the Complainant and purports to offer for sale identical goods. This use is intentional and for commercial gain within the terms of paragraph 4(b)(iv) of the Policy. Moreover, prior UDRP panels have held that the use of a domain name for illegitimate activity, in this case impersonation or passing off, constitutes bad faith. See [WIPO Overview 3.0](#), section 3.4.

Therefore, 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 <us-williams-sonoma.com>, <williams-sonoma-shop.com>, <williams-sonomas-us.com>, and <williamssonoma-usa.shop> be transferred to the Complainant.

*/Matthew Kennedy/*

**Matthew Kennedy**

Sole Panelist

Date: May 27, 2025