

## **ADMINISTRATIVE PANEL DECISION**

Synopsys, Inc. v. santhosh alluri

Case No. D2025-1454

### **1. The Parties**

The Complainant is Synopsys, Inc., United States of America (“United States”), represented by Hogan Lovells (Paris) LLP, France.

The Respondent is santhosh alluri, India.

### **2. The Domain Name and Registrar**

The disputed domain name <synopsys.com> is registered with GoDaddy.com, LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 9, 2025. On April 9, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 9, 2025, the Registrar transmitted by email to the Center its verification response, disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Registration Private, Domains By Proxy, LLC / DomainsByProxy.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 10, 2025, 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 April 15, 2025.

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 April 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was May 19, 2025. The Respondent sent email communications to the Center on April 15 and April 29, 2025. On May 20, 2025, the Center informed the Parties that it would proceed to panel appointment.

The Center appointed Zeynep Yasaman as the sole panelist in this matter on May 23, 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, founded in 1986, is a United States corporation (publicly-traded company) engaged in electronic design automation.

The Complainant is the owner of numerous registered trademarks SYNOPSIS in various jurisdictions. Some of the Complainant's trademark registrations include:

- United States trademark SYNOPSIS no. 1618482, registered on October 23, 1990, in class 9;
- United States trademark SYNOPSIS no. 1601521, registered on June 12, 1990, in class 42;
- European Union trademark SYNOPSIS no. 000181172, registered on February 1, 1999, in classes 9, 16 and 42;
- Indian trademark SYNOPSIS no. 603839, registered on August 12, 1993, in class 9;
- Canadian trademark SYNOPSIS no. TMA458822, registered on June 7, 1996, in classes 7, 9 and 16;
- Australian trademark SYNOPSIS no. 607361, registered on July 22, 1993, in class 9; and
- Singaporean trademark SYNOPSIS no. T9305475E, registered on July 20, 1993, in class 9.

The Complainant is also the owner of domain names comprising the trademark SYNOPSIS, such as <synopsys.com>, <synopsys.biz>, <synopsys.org>, <synopsys.co>, <synopsys.dk>, <synopsys.fr>, <synopsys.jp>, and <synopsys.asia>.

The Complainant also promoted its products and services on social media, with:

- 773,000 followers on LinkedIn;
- 26,000 followers on Facebook;
- 22,900 followers on X;
- 30,500 subscribers on YouTube.

The disputed domain name was registered on December 1, 2024. It resolves to a single-page website displaying the terms "Synopysys" and "Innovative Tech Solutions for Tomorrow", accompanied by an image of two people looking at computer screens, a "Contact Us" form, and an option to sign up for updates, promotions, and more. The Complainant has also provided evidence showing that an attempt to access the website at the disputed domain name triggered a security warning by an Internet browser.

#### **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 name.

Notably, the Complainant contends that the Complainant has established trademark rights in SYNOPSIS for purposes of the Policy and that the disputed domain name is confusingly similar to the Complainant's SYNOPSIS trademark as it comprises a misspelling of the Complainant's trademark whereby an additional letter "y" has been included between the letters "p" and "s" in the Complainant's trademark.

Furthermore, the Complainant argues that the Respondent has no rights or legitimate interests in the disputed domain name. In this regard, the Complainant states that the Respondent has not received any

license or other authorization of any kind to make use of the Complainant's trademark in a domain name or otherwise. The Complainant argues that the Respondent cannot assert that prior to any notice of this dispute, it was using, or had made demonstrable preparations to use the disputed domain name in connection with a bona fide offering of goods or services. According to the Complainant, the Respondent's website is a template that lacks substantive content, and such use of a domain name cannot amount to a bona fide offering of goods or services, nor demonstrable preparations to use the disputed domain name. Moreover, the Complainant argues that the Respondent is not commonly known by the disputed domain name, as the underlying registrant name "Santhosh Alluri" bears no resemblance to the disputed domain name, and there is no evidence of the Respondent having acquired or applied for any trademark registration for "SYNOPSIS" or any variation thereof. The Complainant claims that the Respondent is not making any legitimate noncommercial use since the Respondent's use of the disputed domain name to point to a template website lacking substantive content is analogous to passive holding and does not give rise to a claim of legitimate noncommercial or fair use. In addition to that, the Complainant argues that since the composition of the disputed domain name itself is such that Internet users are likely to be misled as to the source, the disputed domain name carries a risk of implied affiliation with the Complainant and therefore cannot support any legitimate claim of fair use.

Lastly, the Complainant asserts that the disputed domain name was registered and is being used in bad faith.

Regarding the registration in bad faith, the Complainant argues that the Complainant's SYNOPSIS trademark is well known throughout the world, and the Respondent could not argue that it did not have prior knowledge of the Complainant's trademark at the time of registration of the disputed domain name. The Complainant submits that the Respondent's use of a privacy service to conceal its identity with regard to the disputed domain name, coupled with the Respondent's failure to reply to the Complainant's pre-Complaint notice further supports an inference of bad faith on the part of the Respondent. In this regard, the Complainant contends that the Respondent, having no relationship with the Complainant or authorization to make use of its trademark in a domain name or otherwise, knowingly proceeded to register the disputed domain name opportunistically, carrying with it a risk of implied affiliation with the Complainant, in bad faith.

Regarding the use in bad faith, the Complainant contends that the disputed domain name currently resolves to a website template lacking substantive content and that such use is analogous to passive holding and would not prevent a finding of bad faith use. Furthermore, the Complainant argues that due to the facts that the Complainant's trademark is well known internationally in connection with the Complainant's services and the disputed domain name carries a risk of implied affiliation with the Complainant, many Internet users would be confused and wrongly assume that the disputed domain name is owned or operated by the Complainant. According to the Complainant, in light of the degree of similarity between the disputed domain name, the Complainant's company name, Synopsys, Inc., the Complainant's SYNOPSIS trademark and domain names held by the Complainant (including <synopsys.com>, which resolves to the Complainant's official website at "www.synopsys.com"), there is an appreciable risk that the disputed domain name could be used for fraudulent purposes targeting the Complainant's clients. Moreover, the Complainant asserts that the Respondent has not made any bona fide use of the disputed domain name, nor has the Respondent come forward in reply to the Complainant's pre-Complaint notice with any evidence of demonstrable preparations to use the disputed domain name for any bona fide purpose. Furthermore, the Complainant argues that the Respondent registered the disputed domain name using a proxy service to conceal its identity. The Complainant submits that in light of the composition of the disputed domain name itself, there is no plausible good-faith use to which the disputed domain name could be put that would not have the effect of misleading consumers as to the source or affiliation of the disputed domain name. Lastly, in the Complainant's view, noting that Mail Exchange (MX) records have been configured for the disputed domain name, the presence of the disputed domain name in the hands of the Respondent represents an abusive threat hanging over the head of the Complainant and therefore, the Respondent's ownership of the disputed domain name amounts to a continuing abusive use.

## **B. Respondent**

Through its email correspondence with the Center, the Respondent asserts that they registered the disputed domain name casually and have not developed the website, as the disputed domain name merely linked to a single-page template provided by the Registrar. The Respondent further indicates that they no longer use the disputed domain name. Moreover, the Respondent proposed to deactivate and delete the disputed domain name if the Complainant wishes to settle.

## **6. Discussion and Findings**

### **A. Identical or Confusingly Similar**

Paragraph 4(a)(i) of the Policy requires the complainant to show that the disputed domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights.

Where the complainant holds a nationally or regionally registered trademark or service mark, this prima facie satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)), section 1.2.1. In the present case, the Panel notes that the Complainant owns several registered SYNOPSIS trademarks. Accordingly, the Complainant has established rights in a trademark or service mark for the purposes of the Policy.

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 3.0](#), section 1.7.

A domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant mark. [WIPO Overview 3.0](#), section 1.9. Similarly, the applicable generic Top-Level Domain (“gTLD”) in a domain name (e.g., “.com”) is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11. In the present case, the Panel finds the Complainant’s trademark SYNOPSIS is recognizable within the disputed domain name <synopsys.com> as the sole difference lies in the insertion of the letter “y” between “synop” and “sys” in the Complainant’s trademark. Accordingly, the Panel concludes that the disputed domain name is confusingly similar to the Complainant’s trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

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. These are as follows:

- (i) before any notice of the dispute, the respondent’s use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or
- (ii) the respondent (as an individual, business, or other organization) has been commonly known by the domain name, even if the respondent has acquired no trademark or service mark rights; or
- (iii) the respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

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. [WIPO Overview 3.0](#), 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 name. 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 name, such as those enumerated in the Policy or otherwise. Although the Respondent sent informal email communications to the Center, they did not address or challenge any of the Complainant’s assertions and expressed their willingness to transfer or cancel the disputed domain name. Furthermore, the Panel finds that the Respondent’s registration and use of a domain name containing a misspelling of the Complainant’s SYNOPSIS trademark is likely intended to attract and mislead Internet users searching for the Complainant’s website.

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:

(i) circumstances indicating that Respondent has registered or has acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the domain name; or

(ii) that the respondent has registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that the respondent has engaged in a pattern of such conduct; or

(iii) that the respondent has registered the domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) that by using the domain name, the respondent has intentionally attempted to attract, for commercial gain, Internet users to the respondent’s website 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 respondent’s website or location or of a product or service on respondent’s website or location.

In the present case, the Panel notes that the Respondent registered the disputed domain name that represents a very close variation of the Complainant’s trademark SYNOPSIS, company name and domain name <synopsys.com>, differing only by the insertion of a single letter “y” between the letters “p” and “s”, forming the word “synopsys”. Moreover, the disputed domain name resolves to a single-page website that gives the impression of providing technological services similar to those of the Complainant. In this regard, the Panel finds that the Respondent, having in mind the Complainant’s market reputation, registered and used the disputed domain name with the intention to attract, for commercial gain, Internet users to the Respondent’s website, by creating a likelihood of confusion with the Complainant’s trademark.

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 name <synopsys.com> be transferred to the Complainant.

*/Zeynep Yasaman/*

**Zeynep Yasaman**

Sole Panelist

Date: June 6, 2025