

ADMINISTRATIVE PANEL DECISION

SNCF GARES & CONNEXIONS v. jerome knieriemen

Case No. D2025-2501

1. The Parties

The Complainant is SNCF GARES & CONNEXIONS, France, represented by Scan Avocats AARPI, France.

The Respondent is jerome knieriemen, France.

2. The Domain Name and Registrar

The disputed domain name <placedelagare.com> is registered with Porkbun LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 13, 2025. On June 25, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 25, 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 (Whois Privacy, Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 26, 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 June 26, 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 July 2, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 22, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on July 23, 2025.

The Center appointed Christiane Féral-Schuhl as the sole panelist in this matter on July 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

The Complainant is a French state-owned company belonging to the SNCF French railway company responsible for managing and developing the 3,000 passengers train stations in France.

The Complainant is the owner of the French semifigurative mark comprising of a logo  and of the term “PLACE DE LA GARE E-SHOP RENNES” (the “PLACE DE LA GARE trademark”), No. 4702780 registered on November 18, 2020, for products and services in classes 9, 35, 39, and 43.

The Complainant is also the owner of the domain name <placedelagare.fr> registered on October 11, 2013.

The disputed domain was registered on February 15, 2022, and, at the time of the Complaint, resolved to a parking page of the Registrar where it was listed for sale at USD 49,000. At the time of the Decision, the disputed domain name is inactive.

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 disputed domain name is confusingly similar to its prior PLACE DE LA GARE trademark and domain name. The Complainant explains the terms “place de la gare” refer to a project launched by the Complainant aiming at transforming the French train stations into lively community hubs. The Complainant underlines that both its PLACE DE LA GARE trademark and domain name were registered prior to the registration of the disputed domain name. The Complainant submits the disputed domain name reproduces its PLACE DE LA GARE trademark with the sole omission of the final “e-SHOP RENNES” which the Complainant argues is hardly noticeable since it is writing in smaller characters in the trademarks.

Then, the Complainant submits the Respondent has no rights or legitimate interests in the disputed domain name since the Respondent is not currently and has never been known under the name “place de la gare”. The Complainant asserts the Respondent has not been licensed, contracted or otherwise permitted by the Complainant in any way to use the prior PLACE DE LA GARE trademark or to register any domain name incorporating this prior trademark. The Complainant contends the Respondent is not currently known and does not carry out any public activity under the “place de la gare” name or under any other name including the term “gare” and does not own any trademark rights over this name.

Finally, the Complainant asserts the disputed domain name was registered and is being used in bad faith. The Complainant highlights its PLACE DE LA GARE prior trademark and domain name were registered before the registration of the disputed domain name and that the Respondent could not have been unaware of the Complainant's prior trademark and domain name given their extensive presence on the Internet, newspaper and television. The Complainant underlines that any search conducted on search engines with the terms “place de la gare” leads in the first place to websites related to the Complainant's activities. Finally, the Complainant submits the disputed domain name resolves to a page selling the domain name for USD 49 000.

B. Respondent

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

6. Discussion and Findings

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 Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name reproduces the leading component PLACE DE LA GARE of the Complainant's trademark. The omission of the tail end "E-SHOP RENNES" of the mark does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy as the trademark remains recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark 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.

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.

Indeed, it appears that the Complainant has never authorized the Respondent to register the disputed domain name, and that the Respondent is not commonly known by the disputed domain name nor had the intent to use the disputed domain name to offer or goods or services. On the contrary the disputed domain name is, at the time of the Decision, inactive and at the time of the Complaint redirected to a parking page of the Registrar offering the disputed domain name for sale for USD 49,000.

While the Panel notes that the disputed domain name is a combination of dictionary terms ("place de la gare", the Panel finds that, in the circumstances of this case, namely, the Respondent being located in France and the fact that the Complainant is the French national rail service, plus evidence submitted by the Complainant indicating that it substantially advertised in France its project associated with the PLACE DE LA GARE trademark, the Panel finds that 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.

In the present case, the Panel notes that the Respondent registered the disputed domain name after the registration of the Complainant's PLACE DE LA GARE trademark and domain name. The Panel also notes that the Respondent does not appear to be known under the disputed domain name and that on the contrary it used to resolve to a parking page of the Registrar offering the disputed domain name for sale for an amount of USD 49,000.

As noted above, the Panel finds, in the circumstances of this case, that the Respondent, more likely than not, registered the disputed domain name with the Complainant in mind and with the primary purpose to sell the disputed domain name to the Complainant.

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 <placedelagare.com> be transferred to the Complainant.

/Christiane Féral-Schuhl/

Christiane Féral-Schuhl

Sole Panelist

Date: August 6, 2025