

## **ADMINISTRATIVE PANEL DECISION**

Reliance Industries Limited. v. Rajnish Kumar  
Case No. D2025-2676

### **1. The Parties**

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

The Respondent is Rajnish Kumar, India.

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

The disputed domain name <jioeatnow.com> is registered with Ultrahost, Inc. (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 8, 2025. On July 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 22, 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 (John Doe / Whois protection, this company does not own this domain name s.r.o.) and contact information in the Complaint. The Center sent an email to the Complainant on July 22, 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 amended Complaints on July 28 and 29, 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 the Respondent of the Complaint, and the proceedings commenced on July 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 19, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 20, 2025.

The Center appointed Shwetasree Majumder as the sole panelist in this matter on August 22, 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 multinational conglomerate, incorporated in India and spanning its business in several countries. The Complainant is India's largest private sector enterprise, with businesses spanning various industries, including oil and gas exploration and production, petroleum refining and marketing, petrochemicals, retail and telecommunications. The Complainant has been using the mark JIO for its telecom business since the year 2011. The Complainant owns several JIO/JIO-formative trademark registrations, with the earliest dating back to the year 2011. Details of some of such registrations for the mark JIO are as below:

- Jio – Indian Registration No. 2391643, registered on September 7, 2012, in class 43;
- Jio – Indian Registration No. 2466104, registered on January 24, 2013, in class 29;
- Jio – Indian Registration No. 2466105, registered on January 24, 2013, in class 30;
- Jio – Indian Registration No. 2466107, registered on January 24, 2013, in class 32.

The disputed domain name <jioeatnow.com> was registered on June 14, 2025. The disputed domain name does not resolve to a website.

#### **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 incorporates the trademark JIO of the Complainant. The Complainant argues that it has used the mark JIO in connection with its telecom business since 2011, and the earliest registration of its JIO mark dates to December 2011. The Complainant contends that the Respondent is not commonly known by the disputed domain name and has never used or prepared to use it in connection with any bona fide offering of goods or services. The Complainant argues that the disputed domain name was registered specifically with the ulterior motive of cybersquatting and is precluding the Complainant from using the said domain in connection with its legitimate operations. The Complainant further argues that the Respondent is using the disputed domain name with the clear intent to misappropriate the Complainant's brand equity and reputation. The Complainant argues that the Respondent has not used the disputed domain name for any bona fide offering of goods/services and has used the said domain only to cybersquat the disputed domain name, which rightfully belongs to the Complainant.

The Complainant argues that the Respondent deliberately chosen the house mark of the Complainant to indicate some kind of association with the Complainant on the Internet. The Complainant further argues that the Respondent has no connection with the Complainant and has only acquired the disputed domain name with the mala fide intention and might try to sell, rent, or otherwise transfer it to the Complainant or to its competitor for excessive consideration.

##### **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 entirety of the mark is reproduced 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.

Although the addition of the term "eatnow" may bear on the assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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 with 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.

In absence of any response from the Respondent, Panel finds no evidence of the Respondent's use of, or demonstrable preparations to use, the disputed domain name with a bona fide offering of goods or services.

The Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name. The Respondent is neither an agent of the Complainant nor does he carry out activities for the Complainant. There is also no evidence that the Respondent is commonly known by the disputed domain name.

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.

In the present case, the Panel finds that the Complainant has a huge presence in India and the Respondent, being from India himself, was bound to be aware of the Complainant's mark. The disputed domain name is presently parked. In absence of any response or explanation from the Respondent, the Panel is left to infer that the Respondent knowing registered the disputed domain name with the intention of selling, renting, or otherwise transferring it to the Complainant or to its competitor for excessive consideration.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In the present case, the Panel notes that the Respondent is based in India where the Complainant's trademark JIO is already popular and well-known. UDRP panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

In previous UDRP cases, panelists have found that the non-use of a domain name (including a blank or "coming soon" page) would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3.

Given that the Respondent is based in India, it is reasonable to infer awareness of the well-known mark JIO. Further, the Respondent failed to submit a response to the present proceedings and engaged a privacy service to conceal its identity. Accordingly, the Panel finds that the passive holding of the disputed domain name does not prevent a finding of bad faith.

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 <jioeatnow.com> be transferred to the Complainant.

*/Shwetasree Majumder/*

**Shwetasree Majumder**

Sole Panelist

Date: September 5, 2025