

## **ADMINISTRATIVE PANEL DECISION**

Rödl Equity Partner Beteiligung GmbH & Co. KG, Prof. Dr. Christian Rödl, LL.M. (Columbia University, New York) v. PVMV Domains, PVM Domains  
Case No. D2025-2849

### **1. The Parties**

The Complainants are Rödl Equity Partner Beteiligung GmbH & Co. KG and Prof. Dr. Christian Rödl, LL.M. (Columbia University, New York), Germany, represented by Rödl GmbH Rechtsanwaltsgesellschaft Steuerberatungsgesellschaft, Germany.

The Respondent is PVMV Domains, PVM Domains, United States of America.

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

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

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 18, 2025. On July 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 18, 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 (unknown) and contact information in the Complaint. The Center sent an email communication to the Complainants on July 21, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainants to submit an amendment to the Complaint. The Complainants requested addition of the registrant information to the Complaint on July 21, 2025.

The Center verified that the Complaint together with the amendment to the 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 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 11, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 14, 2025.

The Center appointed Anne-Virginie La Spada as the sole panelist in this matter on August 19, 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 First Complainant, Rödl Equity Partner Beteiligung GmbH & Co. KG, is a German auditing and consulting firm headquartered in Nuremberg, offering among other services legal consulting services, with more than 110 offices in 50 countries. The Second Complainant, Prof. Dr. Christian Rödl, is the managing partner, chairman of the management board and a major shareholder of the First Complainant.

Among other registrations, the First Complainant is the owner of the following trademark registrations:

- International registration No. 801971 for RÖDL & PARTNER, registered on February 25, 2003, in classes 35, 36 and 42; and
- European Union Trademark registration No. 003062924 for RÖDL & PARTNER, registered on January 4, 2005, in classes 35, 36 and 42.

Among other registrations, the Second Complainant is the owner of the following trademark registrations:

- International registration No. 940658 for RÖDL, registered on June 22, 2007, in classes 35, 36 and 45; and
- European Union Trademark registration No. 006026281 for RÖDL, registered on April 23, 2008, in classes 35, 36 and 45.

The Complainants also own numerous domain names for or including “roedl”.

The disputed domain name was registered on September 23, 2024.

At the time of filing of the Complaint, the disputed domain name resolved to a parking page of the Registrar featuring pay-per-click (“PPC”) links to third party websites, purportedly offering legal services.

#### **5. Parties’ Contentions**

##### **A. Complainants**

The Complainants contend that they have satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainants contend that the disputed domain name is confusingly similar to their registered trademarks and domain names as it includes the term “rodll” with the mere adjunction of purely descriptive and functional terms, namely “andlaw”, which are generally used for the advertisement of law firms and accountants.

The Complainants further contend that the Respondent has no rights or legitimate interests in the disputed domain name. According to the Complainants, the Respondent has not been authorized by the Complainants to use the disputed domain name and is not commonly known by the disputed domain name. Furthermore, the Respondent has hidden its identity and the Respondent has intentionally attempted to create a likelihood of confusion by pointing the disputed domain name to a website containing PPC links to third-party websites.

Finally, the Complainants contend that the disputed domain name was registered and used in bad faith. They consider that the Respondent's use of the term "rod1" is aimed at taking advantage of the Complainants' trademark. In particular, the Complainants contend that the Respondent registered and used the disputed domain name to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainants' trademark as to the source of the Respondent's website.

## **B. Respondent**

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

## **6. Discussion and Findings**

### **6.1 Consolidation of Complaints**

The Complaint was filed by two Complainants against a single Respondent. Neither the Policy nor the Rules expressly provides for or prohibits the consolidation of multiple complainants. In this regard, WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.1, states as follows:

"In assessing whether a complaint filed by multiple complainants may be brought against a single respondent, panels look at whether (i) the complainants have a specific common grievance against the respondent, or the respondent has engaged in common conduct that has affected the complainants in a similar fashion, and (ii) it would be equitable and procedurally efficient to permit the consolidation."

Both of the Complainants are closely connected. The Second Complainant is the managing partner, chairman of the management board and a major shareholder of the First Complainant. In addition, both of the Complainants own rights to trademarks including or consisting of RÖDL.

The Panel finds that the Complainants have a specific common grievance against the Respondent as they have a common legal interest in the trademark rights on which this Complaint is based, and it is equitable and procedurally efficient to permit the consolidation of their complaints. The Complainants shall be referred to from now on as the "Complainant".

### **6.2 Substantive Issues**

According to paragraph 4(a) of the Policy, a complainant must assert and prove each of the following:

- (i) the domain name registered by the respondent 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 domain name; and
- (iii) the domain name has been registered and is being used in bad faith.

#### **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 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.

The fact that the umlaut present on top of the letter “O” in the Complainant’s mark RÖDL is absent from the disputed domain name does not prevent a finding of confusing similarity as it is usual to leave accented characters out of domain names and the Complainant’s mark is clearly recognizable.

Although the addition of other terms (here, “and law”) may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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 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.

A respondent’s use of a domain name will not be considered “fair” if it falsely suggests affiliation with the trademark owner. [WIPO Overview 3.0](#), section 2.5.1.

In the present case, the disputed domain name carries a risk of implied affiliation with the Complainant: the disputed domain name combines the Complainant’s trademark RÖDL with the terms “and law”, referring to one important aspect of the Complainant’s activities, namely the provision of legal advice.

Furthermore, based on the information submitted by the Complainant, the Complainant has not granted the Respondent authorization to use its trademarks within the disputed domain name. Moreover, there is no evidence indicating that the Respondent is commonly known by the disputed domain name. Instead, based on the evidence provided by the Complainant, it appears that the Respondent used the disputed domain name in connection with a parking page containing PPC links to third-party websites in the field of law. Applying paragraph 4(c) of the Policy, UDRP panels have found that the use of a domain name to host a parked page comprising PPC links does not represent a bona fide offering where such links compete with or capitalize on the reputation and goodwill of the complainant’s mark or otherwise mislead Internet users. [WIPO Overview 3.0](#), section 2.9.

Finally, the Respondent did not file a Response to the Complaint. The Panel may draw from the lack of a Response the inferences that it considers appropriate, according to the Rules, paragraph 14(b).

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 notes that the disputed domain name was registered many years after the Complainant first registered and used its RÖDL trademark. Given the distinctiveness of the Complainant's trademark, it is unlikely that the Respondent registered the disputed domain name – which combines the Complainant's trademark with the terms “and law” – without prior knowledge of the Complainant's trademark and of its activities. Consequently, the Panel considers that the Respondent could not ignore the existence of the Complainant and of its trademark at the time of the registration of the disputed domain name, such that the disputed domain name was registered in bad faith.

In addition, the presence of PPC links to third-party websites on the page to which the disputed domain name resolves supports a finding of use in bad faith. Indeed, redirecting the disputed domain name to a webpage with PPC links related to the activity field of the Complainant suggests an intention on the part of the Respondent to exploit and profit from the Complainant's trademark, by attempting to generate financial gains by means of “click through” revenues. Such conduct constitutes bad faith registration and use of the disputed domain name within the meaning of paragraph 4(b)(iv) of the Policy (see *F. Hoffmann-La Roche AG v. James Lee*, WIPO Case No. [D2009-1199](#); *Scania CV AB v. Michael Montrief*, WIPO Case No. [D2009-1149](#); *Aspen Holdings Inc. v. Rick Natsch, Potrero Media Corporation*, WIPO Case No. [D2009-0776](#); and *AllianceBernstein LP v. Texas International Property Associates*, WIPO Case No. [D2008-1230](#)).

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 <rodlandlaw.com> be transferred to the Complainant.

*/Anne-Virginie La Spada/*  
**Anne-Virginie La Spada**  
Sole Panelist  
Date: September 3, 2025