

ADMINISTRATIVE PANEL DECISION

Shirt S&D Management LLC v. Michael Nemeroff
Case No. D2025-2943

1. The Parties

The Complainant is Shirt S&D Management LLC, United States of America ("United States" or ("U.S.")), represented by Tucker & Latifi, LLP, United States.

The Respondent is Michael Nemeroff, United States, represented by Anton Kaminsky, Esquire, United States.

2. The Domain Names and Registrar

The disputed domain names <jiffyblank.com> and <jiffyblanks.com> are registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 23, 2025. On July 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On July 24, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (GoDaddy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 25, 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 the same date.

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 28, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 17, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 18, 2025.

The Parties requested the suspension of the proceeding on August 19, 2025, and the Center suspended the proceeding on August 20, 2025, until September 20, 2025.

On September 17, 2025, the Complainant notified the Center of its intention to suspend indefinitely the proceedings. The Center invited the Respondent to comment on this request and also invited the Complainant to comment if the Respondent filed any objections. The Parties' communications on September 24, 2025, demonstrated that the Parties did not agree on the terms of suspension or termination of the proceedings. The Center requested clarification from the Parties by October 10, 2025, and, receiving none, ultimately appointed W. Scott Blackmer as the sole panelist in this matter on October 16, 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.

On October 17, 2025, the Complainant sent an email to the Center requesting again that the proceedings be suspended or terminated, in light of the federal court complaint filed by the Complainant and another company against the Respondent and his company, *JiffyShirts.com, (US) L.P., and Shirts [sic] S&D Management LLC v. Ninja Transfers, LLC, and Michael Nemeroff*, Case 2:25-cv-05316 (US Dist. Ct. ED Pa) (Complaint, September 16, 2025) (the "*JiffyShirts.com* lawsuit"). The Center forwarded this request to the Panel, which addresses it below.

4. Factual Background

The Complainant is a limited liability company established under the laws of the State of Delaware, United States, and headquartered in New York, New York, United States. The Complainant states that it launched Jiffy.com "over a decade ago" to provide customers nationwide with wholesale apparel blanks and printing services or transfer applications to create quality, affordable, customized apparel. The Complainant states that it operates a primary website at "www.jiffy.com" and also owns the domain names <jiffyshirts.com> and <jiffyshirt.com>, which redirect to the Complainant's website.

The Complainant's website is headed with a JIFFY logo composed of stylized letters following three horizontal lines. The website advertises blank T-shirts and other apparel and allows the user to design messages and images to print on the apparel. The site's terms and contact information are all given in the name of "Jiffy.com", with a postal address in Wilmington, Delaware. As the Delaware Division of Corporations database has no listing for a "Jiffy.com", the operator of the Complainant's website is presumably JiffyShirts.com, (U.S.) L.P. ("JiffyShirts.com"), the other plaintiff, along with the Complainant, in the *JiffyShirts.com* lawsuit mentioned above.

The Panel notes that, according to the online database of the Delaware Division of Corporations, the Complainant and JiffyShirts.com were both established on October 14, 2008. The Complaint explains that the Complainant owns the relevant trademarks and Jiffyshirts.com is the entity that operates the Complainant's website in the United States.

Based on screenshots archived by the Internet Archive's Wayback Machine, it appears that the Complainant or a predecessor used the domain names <jiffyshirts.com> and <jiffyshirt.com> from 2007 through 2024 for what the Panel refers to hereafter as the "Complainant's website", when it was relocated to <jiffy.com>.¹ The screen captures for the Complainant's website as early as 2007 displayed a JIFFYSHIRTS.COM logo with stylized letters in a curved line with two arrows; some later versions are similar but without ".COM".

¹Presumably, the predecessor was Shirt Supply and Decoration LLC. This entity filed the application in 2007 to register the JIFFYSHIRTS.COM word mark listed below and later assigned it to the Complainant, according to the database of the United States Patent and Trademark Office ("USPTO"). Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in this proceeding. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([WIPO Overview 3.0](#)), section 4.8.

The Complainant holds several United States “Jiffy” trademark registrations, including the following:

Mark	Reg. No.	Reg. Date	Goods or Services
JIFFYSHIRTS.COM (standard characters)	3333844	November 12, 2007	IC 36
JIFFYSHIRTS.COM (words and design)	4604855	September 16, 2014	IC 35
JIFFY (words and design)	6936999	December 27, 2022	IC 25

The Complainant also claims common law trademark rights in “the JIFFY marks” dating from “at least 2007”.

The disputed domain names <jiffyblank.com> and <jiffyblanks.com> were both created on September 2, 2023, and are registered to Michael Nemeroff, listing no organization, a postal address in the Commonwealth of Pennsylvania, United States, and a contact email address at [...]@rushordertees.com. The “Rush Order Tees” website associated with that domain name advertises and sells “Custom T-Shirts & Apparel on Any Deadline”.

The disputed domain names both redirect to the website headed “Ninja Blanks” at “www.ninjatransfers.com”, advertising and selling “Blank Apparel at Wholesale Prices”. The website allows users to purchase “blank” T-shirts and other apparel and have transfers applied or design messages and images that can be printed on the apparel, which is shipped nationwide. Thus, the Respondent and the Complainant offer essentially the same services with many of the same products, in direct competition. The Ninja Blanks website displays the same contact details found in the “Rush Order Tees” website associated with the contact details for the disputed domain name registrations.

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 names are confusingly similar to its JIFFY marks, which the Respondent has no license to use. The Complainant asserts that the Respondent is not commonly known by a corresponding name and cannot be said to be doing a legitimate business with the disputed domain names because it is only infringing the Complainant’s trademarks and creating confusion in an attempt to redirect consumers to its own site. The Complainant argues that this also represents bad faith under the Policy.

B. Respondent

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

6. Discussion and Findings

6a. Preliminary Issue: Suspension or Termination

The Complainant has requested suspension or termination of this proceeding in deference to the pending *JiffyShirts.com* lawsuit in federal district court, which the Complainant (the trademark owner) filed in company with JiffyShirts. That lawsuit seeks damages and declaratory relief, including transfer of the disputed domain names.

Paragraph 18(a) of the Rules gives the Panel discretion to suspend, terminate, or continue a UDRP proceeding where the disputed domain name is also the subject of other pending legal proceedings. However, panels are reluctant to do so, “most notably because of the potential for indeterminate delay”. [WIPO Overview 3.0](#), section 4.14, 4.14.1. The Panel notes that UDRP decisions are not binding on the courts but offer expeditious remedies for the narrow issue of control over disputed domain names pending any resolution of larger and more complex legal disputes.

Accordingly, the Panel determines to deny the request for suspension or termination of this proceeding.

6b. Substantive Issues

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 (the registered JIFFYSHIRTS.COM word mark and combined mark and the JIFFY combined mark in which the textual element “Jiffy” is prominent), for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds it unnecessary to assess the Complainant’s claim in addition to unregistered trademark or service mark rights. [WIPO Overview 3.0](#), section 1.3.

The entirety of the textual element of the JIFFY combined mark is reproduced within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to this mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel finds the JIFFYSHIRTS.COM marks are recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms (here, “blank” or “blanks”) 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. In this case, the Panel considers the overall circumstances relevant to support the finding of confusing similarity, given that the Parties are direct competitors, and both use the terms “blank” and “blanks” extensively on their websites to describe their products. See [WIPO Overview 3.0](#), sections 1.7, 1.15.

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. The Respondent is not known by a corresponding name, and while the Respondent is using the disputed domain names to redirect to a site where it conducts business, this cannot be considered a legitimate use in connection with a "bona fide" offering of goods and services as it transparently targets the trademarks of a direct competitor. See [WIPO Overview 3.0](#), section 2.5.3: "a respondent's use of a complainant's mark to redirect users (e.g., to a competing site) would not support a claim to rights or legitimate interests". Notably, the Respondent has not come forward to claim otherwise.

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 Respondent is a direct competitor of the Complainant in a nationwide, online business in which the Complainant has been established since 2008 (with its predecessor using JIFFY marks since 2007), so it safely can be concluded that the Respondent was aware of the Complainant and its JIFFY marks when registering the disputed domain names in 2023 and using them to redirect to the Respondent's competing website. This is a clear instance of the example of bad faith given in the Policy, paragraph 4(b)(iv), intentionally attempting to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's mark.

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 <jiffyblank.com> and <jiffyblanks.com> be transferred to the Complainant.

/W. Scott Blackmer/

W. Scott Blackmer

Sole Panelist

Date: October 27, 2025