

ADMINISTRATIVE PANEL DECISION

DDP Specialty Electronic Materials US, LLC v. Vladimir Veselovskiy
Case No. D2025-3033

1. The Parties

The Complainant is DDP Specialty Electronic Materials US, LLC, United States of America (“United States”), represented by Ballard Spahr, LLP, United States.

The Respondent is Vladimir Veselovskiy, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <greatstuffinsulating.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 30, 2025. On July 30, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 30, 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 (Redacted) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 31, 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 August 1, 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 August 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was August 26, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on August 28, 2025.

The Center appointed Anna Carabelli as the sole panelist in this matter on September 5, 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

As per undisputed evidence submitted with the Complaint, the Complainant is a United States based company manufacturing and marketing sealing compounds for insulating purposes and foam spray insulating products under the trademark GREAT STUFF. The GREAT STUFF product line, which was developed and launched in 1978 by the Complainant's predecessor in interest, The Dow Chemical Company, has gained a considerable reputation over the years and has won awards for its innovations, namely, the Gold Edison Award in the Industrial Design category in 2020 and the Adhesive and Sealant Council Award for Innovation and the American Chemistry Council Sustainability Award for Environmental Protection in 2021.

The Complainant is the owner of the following trademark registrations for GREAT STUFF:

- United States trademark registration No. 1126845, GREAT STUFF, registered on November 20, 1979, with a first use in commerce date of August 1, 1978, in Class 17;
- United States trademark registration No. 2386253, GREAT STUFF PRO, registered on September 12, 2000, with a first use in commerce date of October 1998, in Class 17;
- United States trademark registration No. 7111130, GREAT STUFF (Figurative), registered on July 18, 2023, with a first use in commerce date of March 6, 2022, in Class 17;
- United States trademark registration No.7538429, GREAT STUFF (Figurative), registered on October 15, 2024, with a first use in commerce date of April 1, 2024, in Class 1;
- United States trademark registration No. 7422383, GREAT STUFF (Figurative), registered on June 18, 2024, with a first use in commerce date of February 21, 2024, in Class 9;
- United States trademark registration No.7392018, GREAT STUFF (Figurative), registered on May 21, 2024 with a first use in commerce date of May 12, 2022, in Class 21.

The Complainant's GREAT STUFF products are marketed and promoted also online, through the Complainant's official website at "www.greatstuff.dupont.com" which is operated by the Complainant's parent company Du Pont de Nemours, Inc.

The disputed domain name was registered on November 15, 2024, and resolves to a website allegedly offering the Complainant's products and mimicking the Complainant's official website, by copying portions of the Complainant's content (including an embedded link to one of the Complainant's YouTube videos as well as copies of the Complainant's products' photographs), and by displaying a variant of the Complainant's GREAT STUFF logo and a text claiming to be "Great Stuff Insulating, Foam Sealant Manufacturer". The Respondent's website also contains references to the Complainant's predecessor in interest - The Dow Chemical Company - in the email address ("@dow.com") and in the address ("Dow Building Solutions") displayed at the bottom of the landing page, and bears a "© 2025 Great Stuff Insulating" copyright notice.

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's trademark GREAT STUFF has been in continuous use since 1978, and has acquired a significant goodwill and reputation;
- The disputed domain name is confusingly similar to the Complainant's trademark, since it includes the Complainant's mark in its entirety, with addition of the term "insulating" which is closely related to the Complainant and its business;
- The Respondent has no rights or legitimate interests in respect of the disputed domain name since (i) the Complainant has not authorized or somehow given consent to the Respondent to register the disputed

domain name, (ii) the Respondent is not commonly known by the disputed domain name, and (iii) the Respondent's use of the disputed domain name is neither a bona fide offering of goods or services nor a legitimate noncommercial or fair use. In this regard, the Complainant contends that the Respondent is using the disputed domain name in an attempt to impersonate the Complainant and create the false impression that the disputed domain name and related website is connected to the Complainant;

- The disputed domain name was registered and is being used in bad faith;
- The Complainant further contends that the Respondent is a serial cybersquatter with a pattern of bad faith registration and use who lost seven prior domain name dispute proceedings under the Policy (see *Hardware Resources, Inc. v. Vladimir Veselovskiy*, National Arbitration Forum Claim FA 2506002160399; *Tangi-Pac, LLC v. Vladimir Veselovskiy*, National Arbitration Forum Claim FA 2504002152008; *Indian Industries, Inc. v. Vladimir Veselovskiy*, National Arbitration Forum Claim FA2503002143344; *Rosewood Wish, Inc. v. Vladimir Veselovskiy*, National Arbitration Forum Claim FA 2408002109350; *Lyman Products Corporation v. Vladimir Veselovskiy*, National Arbitration Forum Claim FA 2405002100296; *The Kraft Heinz Company v. Vladimir Veselovskiy*, WIPO Case No. [D2025-0020](#); *Fridababy, LLC v. Vladimir Veselovskiy*, WIPO Case No. [D2025-0248](#)).

Based on the above the Complainant requests the disputed domain name be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs the Panel to decide the Complaint based on the statements and documents submitted and in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable.

Under paragraph 4(a) of the Policy, the Complainant must prove each of the following:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

Paragraph 4(b) of the Policy sets out four illustrative circumstances, which for the purposes of paragraph 4(a)(iii) of the Policy, shall be evidence of registration and use of a domain name in bad faith.

Paragraph 4(c) of the Policy sets out three illustrative circumstances any one of which, if found by the Panel, shall be evidence of the Respondent's rights to or legitimate interests in a disputed domain name for the purposes of paragraph 4(a)(ii) of the Policy above.

6.1 Preliminary Matters

The Panel notes that the Respondent's postal address is stated to be in Ukraine and that no communication has been received from the Respondent. Noting that Ukraine is subject to an international conflict at the date of this Decision, the Panel is to consider, in accordance with paragraph 10 of the Rules, whether the proceeding should continue.

Having considered the circumstances of the case, the Panel is of the view that it should. The Panel notes that the Center has used the Respondent's email address as registered with the Registrar for the purpose of notifying the Complainant. There is no evidence that the notification of the Complaint email to this email address was not successfully delivered.

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 and 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 addition of the generic Top-Level Domain, such as ".com" is viewed as a standard registration requirement and as such is typically disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1.

Although the addition of other terms, here "insulating", may bear on 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 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.

Additionally, the composition of the disputed domain name, containing the Complainant's GREAT STUFF trademark, and the content of the Respondent's website (offering for sale the Complainant's products and displaying a variation of the Complainant's GREAT STUFF logo as well as materials taken from the Complainant's official website) create a risk of confusion among Internet users. As per the undisputed evidence submitted with the Complaint, the Respondent's website did not show any information about the Respondent or disclaimer accurately disclosing the Respondent's relationship, or lack thereof, with the Complainant.

Panels have held that the use of a domain name for illegal activity like passing off/impersonation, as it is the case here, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1

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 Complainant's GREAT STUFF trademark has been continuously and extensively used globally for many years and has, as a result, acquired considerable reputation and goodwill worldwide. In view of the well-known character of the GREAT STUFF trademark, it is difficult to believe that the Respondent did not have in mind the Complainant's trademark when registering the disputed domain name, consisting of the Complainant's well-known trademark. Prior panels have consistently found that the mere registration of a domain name that is identical or confusingly similar to a famous or well-known trademark by an unaffiliated entity can by itself create a presumption of bad faith. [WIPO Overview 3.0](#), section 3.1.4.

The content of the Respondent's website as described above, establishes both the Respondent's actual knowledge of the Complainant's rights as at the date of registration of the disputed domain name, and the Respondent's intention to take unfair advantage of those rights.

The above conduct constitutes bad faith registration and use of the disputed domain name under the Policy.

Indeed, the Respondent has used the disputed domain name to capitalize on the goodwill of the Complainant's GREAT STUFF trademark, and has intentionally attempted to divert the Complainant's customers and potential customers to an imitative website featuring the Complainant's products.

Panels have held that the use of a domain name for illegal activity, such as impersonation/passing off as it is the case here, constitutes bad faith for the purpose of paragraph 4(a)(ii) of the Policy. [WIPO Overview 3.0](#), section 3.4.

In addition, the Respondent's pattern of conduct of registering domain names reflecting third parties' trademarks established in prior domain name dispute proceedings further justify a finding a bad faith registration and use.

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 <greatstuffinsulating.com> be transferred to the Complainant.

/Anna Carabelli/

Anna Carabelli

Sole Panelist

Date: September 19, 2025