

ADMINISTRATIVE PANEL DECISION

Info Edge (India) Limited v. Devajee Chikhaliya
Case No. D2025-3074

1. The Parties

The Complainant is Info Edge (India) Limited, India, represented by Rahul Chaudhry & Partners, India.

The Respondent is Devajee Chikhaliya, India.

2. The Domain Name and Registrar

The disputed domain name <naukariindia.com> is registered with Squarespace Domains II LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 1, 2025. On August 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 4, 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 (Registrant of Impugned Domain/REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 11, 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 amendment to the Complaint on August 12, 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 August 15, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 4, 2025. The Respondent sent an email communication to the Center on September 2, 2025. On September 9, 2025, the Center notified the Parties that it would proceed to panel appointment.

The Center appointed Shwetasree Majumder as the sole panelist in this matter on September 15, 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 one of the India's leading Internet companies operating platforms such as "Naukri.com", "Jeevansathi.com", "99acres.com", "Shiksha.com", and "Quadrangle". The Complainant's flagship brand NAUKRI.COM was launched in 1997, and is a popular jobs and e-recruitment platform in India.

The Complainant's marks NAUKRI and NAUKRI.COM are registered marks and details of some of such registrations are as below:

- NAUKRI – Indian Registration No. 888594, registered on November 26, 1999, in International class 9;
- NAUKRI.COM – Indian Registration No. 1262309, registered on January 21, 2004, in International class 42; and
- **naukri.com** (stylized device) – Indian Registration No. 1484179, registered on September 4, 2006, in International class 35.

The Complainant's main business website is "www.naukri.com", which has been registered since the year 1997.

The disputed domain name was registered on August 12, 2021. Presently, the disputed domain name does not resolve into any active website. But according to the evidence submitted by the Complainant, in the past, the Respondent's website provided job listings and openings and also displayed advertisements. Further, the Respondent's website used **naukariindia.com** in a font style and colour scheme virtually identical to the Complainant's formal logo (until about 2024) depicted as below:



In May 2025, the Complainant had sent a cease-and-desist notice to the Respondent, but was met with no response.

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 deceptively similar to the trademark of the Complainant. The Complainant argues that the disputed domain name incorporates the Complainant's mark in its entirety with the mere insertion of the letter "a" resulting in a common misspelling of "naukari". Further, the Complainant states that addition of the geographical term "india" in the disputed domain name exacerbates the confusion in the minds of consumers.

The Complainant contends that it holds a portfolio of registered trademarks for NAUKRI and NAUKRI.COM marks dating back to the year 1999. The Complainant has submitted details of past UDRP decisions and orders of the High Court of Delhi where the Complainant's rights in its mark have been recognized. The Complainant stresses that its mark has acquired distinctiveness and a secondary meaning, such that reference to NAUKRI or NAUKRI.COM connotes reference to its e-recruitment platform, which is recognized by the High Court of Delhi.

The Complainant contends that the Respondent has no legitimate rights or interests in respect to the disputed domain name and lacks a bona fide and noncommercial interest in the disputed domain name. The Complainant further submits that the Respondent's website closely mimicked its mark by copying the same font and colour scheme. The Complainant argues that the Respondent is using the disputed domain name to offer job listings, thereby giving a false impression of association. The Complainant contends that the Respondent is attempting to create a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation or endorsement of the Respondent's products, as well as divert consumers. The Respondent has registered and used the disputed domain name in bad faith.

B. Respondent

The Respondent did not reply to the Complainant's contentions. The Respondent did however send an email communication on September 2, 2025 stating the below:

"I confirm that I do not wish to renew the domain name <naukariindia.com>. Please proceed as per ICANN policy and UDRP process."

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, with the addition of the letter "a" to form the term "naukari", which is a misspelling of the mark. The Panel finds the misspelling does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy because the mark remains recognizable in the disputed domain name. [WIPO Overview 3.0](#), section 1.9.

Although the addition of the geographical term "india" 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.

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 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.

The Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name. The Panel is aware that presently the disputed domain name does not have any hosted content. However, the Respondent’s website in the past was aimed at misleading Internet users into believing that the website might be related to the Complainant’s services by using a logo with different texts but having the virtually identical font style and colour scheme and providing identical services.

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 Respondent intentionally attempted to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant’s mark. The Panel finds that the Respondent registered the disputed domain name and was using a logo with different texts but having the virtually identical font style and colour scheme to provide same services, with an intent to pose as the Complainant’s business in an attempt to deceive Internet users. The Respondent, who is also based in India, was most likely aware of the Complainant’s popular e-recruitment platform when registering the disputed domain name. Hence, the Panel does not find any plausible legitimate reason for the Respondent to register and use the disputed domain name.

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.

Panels have held that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) 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. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under the Policy.

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 <naukariindia.com> be transferred to the Complainant.

/Shwetasree Majumder/

Shwetasree Majumder

Sole Panelist

Date: September 29, 2025