

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Arshpreet Singh
Case No. D2025-3296

1. The Parties

The Complainant is Scribd, Inc., United States of America, represented by IPLA, United States of America.

The Respondent is Arshpreet Singh, India.

2. The Domain Name and Registrar

The disputed domain name <scribd.com> is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 15, 2025. On August 18, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 19, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. On August 19, 2025, a third party sent an email stating that he had “already taken down the domain name,” but did not confirm any relationship with the named Respondent. The Complainant filed an amendment to the Complaint on August 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 August 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 11, 2025. The Center informed the Parties that it would proceed with panel appointment on September 16, 2025.

The Center appointed Iris Quadrio as the sole panelist in this matter on September 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 Complainant operates a digital platform allowing users to find and upload content across virtually all topics and niches, ranging from academic papers and legal documents to manuals, hobbies, and other materials.

Since its launch in 2007, the Complainant has grown into a leading subscription-based service with more than 1,950,000 paying subscribers and attracting over 200,000,000 unique visitors per month to its official website at “www.scribd.com”.

The Complainant’s services are also broadly available through mobile applications. On Apple’s App Store, the Complainant’s self-titled application “Scribd” has received over 140 ratings, while its e-book and audiobook application “Everand” ranks 37th in the “Books” category, with more than 26,000 ratings and an overall score of 4.4. On Google Play, the Scribd app has been downloaded over 1 million times, with more than 4,600 reviews and a 3.0 overall rating. The Everand app has achieved over 10 million downloads and maintains an overall 4.0 rating.

The Complainant is the owner of the trademark SCRIBD in many jurisdictions, including United States Patent and Trademark Office (USPTO) Reg. No. 3777227, for classes 9, 35, 38, and 42; registered since April 20, 2010, and Reg. No. 5898302, for classes 9, 35, and 42, registered since October 29, 2019; Argentina Trademark Office Reg. No. 3176870 for class 35, registered since August 9, 2019, and Reg. No. 3145657 for class 42, registered since August 9, 2019; and United Kingdom Intellectual Property Office (UKIPO) Reg. No. 801422028, for class 9, 35 and 42, registered since April 28, 2020.

The disputed domain name was registered on August 26, 2024, and it resolved to a website displaying the Complainant’s trademark SCRIBD and allegedly offering an “Online Scribd Downloader” tool enabling users to download content from the Complainant’s platform without subscribing, by acting as a proxy and manipulating the URL link. The Complainant also submitted evidence that the website at the disputed domain name redirect had been blocked as unsafe. Currently it resolves to an inactive 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.

The Complainant states that the disputed domain name <scridownloader.com> is confusingly similar to its trademark SCRIBD on which the Complainant has prior rights.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name <scridownloader.com> and he is not related in any way with the Complainant. The Complainant has not established any activity and/or business with the Respondent.

More specifically, the Complainant alleged that the Respondent has not used and/or has no demonstrable intention to use the disputed domain name except to create a likelihood of confusion with the Complainant’s trademark. In fact, the Complainant claims that the first use of the disputed domain name is only intended to generate confusion among consumers as to the origin of the website.

Finally, the Complainant has requested the Panel to issue a decision ordering the transfer of the disputed domain name to the Complainant.

B. Respondent

The Respondent did not reply to the Complainant's contentions. However, on August 19, 2025, an individual sent an email in reply to the Center's Notice of Registrant Information stating that he had "already taken down the domain name" but did not confirm any relationship with the named Respondent, Arshpreet Singh.

6. Discussion and Findings

According to paragraph 4(a) of the Policy, for this Complaint to succeed in relation to the disputed domain name, the Complainant must prove each of the following, namely that:

- (i) the disputed domain name is identical or confusingly similar with a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interest in respect of the disputed domain name; and
- (iii) the disputed domain name was 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 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 Panel finds the mark is 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 typosquatting practice of deleting the letter "b" in the word "scribd" does not prevent the Panel from finding that the disputed domain name is confusingly similar to the Complainant's trademark, in line with section 1.9 of the [WIPO Overview 3.0](#).

Although the addition of other terms (here the disputed domain name is a portmanteau of a typosquatted version of the Complainant's trademark and the term "downloader") 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.

The Complainant has claimed not to have authorized, licensed, or permitted the Respondent to register or use the disputed domain name or to use the SCRIBD trademark nor is there any other evidence in the file suggesting that the Respondent has or could have rights or legitimate interests in the disputed domain name.

Likewise, it does not seem that the Respondent is making any legitimate noncommercial or fair use of the disputed domain name. In this regard, the Complainant has submitted evidence showing that, at the time of its detection, the disputed domain name was pointing to a website displaying the Complainant's trademark SCRIBD and allegedly offering an "Online Scribd Downloader" tool enabling users to download content from the Complainant's platform without subscribing, by acting as a proxy and manipulating the URL link. These actions, which clearly involve offering a tool to obtain the Complainant's content without proper authorization or compensation, are manifestly designed to exploit the Complainant's reputation by misleading Internet users into believing that the website is affiliated with or endorsed by the Complainant. Hence, as established in section 2.5 of the [WIPO Overview 3.0](#): "Fundamentally, a respondent's use of a domain name will not be considered 'fair' if it falsely suggests affiliation with the trademark owner; the correlation between a domain name and the complainant's mark is often central to this inquiry."

As shown in Annex 7 to the Complaint, the Complainant has also proven that when the disputed domain name is accessed through a protected software environment the disputed domain name redirect is blocked as unsafe, indicating a possible threat of viruses and malware. Panels have held that the use of a domain name for illegal activity, here, claimed as distributing malware, 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 such connection, the Complainant has submitted evidence to support that the trademark SCRIBD was registered and used many years before the Respondent registered the disputed domain name. When registering the disputed domain name, it is clear the Respondent targeted the Complainant's trademark SCRIBD to create confusion among Internet users and benefit from the Complainant's reputation. Therefore, the Panel is satisfied that the Respondent must have been aware of the Complainant and the Complainant's trademark SCRIBD when it registered the disputed domain name.

Likewise, based on the evidence provided by the Complainant, the disputed domain name resolved to a website that made use of the Complainant's trademark SCRIBD and advertised to Internet users that it offered a tool to access and download copyrighted materials available on the Complainant's platform by acting as a proxy and manipulating the target URL, thereby facilitating free access to content ordinarily restricted to paying subscribers. The Respondent's website explicitly advertised "Easily download PDFs and DOCs with our free Scribd Downloader. Say goodbye to download limits. With our Scribd Downloader, you

can download as many documents as you need, whenever you need them". Such conduct, combined with the use of the Complainant trademark SCRIBD, clearly shows that the Respondent was aware of the Complainant when registering the disputed domain name and did so in bad faith.

Currently the disputed domain name resolves to an inactive website. Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant's trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of 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 <scridownloader.com> be transferred to the Complainant.

/Iris Quadrio/

Iris Quadrio

Sole Panelist

Date: October 5, 2025.