

## **ADMINISTRATIVE PANEL DECISION**

Scribd, Inc. v. Jahanzaib khan, JahaSoft, Tahseen Kiani  
Case No. D2025-3300

### **1. The Parties**

The Complainant is Scribd, Inc., United States of America ("US"), represented by IPLA, US.

The Respondents are Jahanzaib khan, JahaSoft, Pakistan, and Tahseen Kiani, Pakistan.

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

The disputed domain names <slidedownload.com> and <slidesdownloader.com> are registered with NameCheap, Inc. (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 names. On August 19, 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 (NameCheap, Inc) and contact information in the Complaint.

The Center sent an email communication to the Complainant on August 19, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on August 23, 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 27, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 16, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 23, 2025.

The Center appointed Rebecca Slater as the sole panelist in this matter on October 6, 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 a US corporation headquartered in Delaware. The Complainant provides a hosting service for professional content via its official website at the <slideshare.net> domain name. The hosting service was officially launched in 2006. Since this time, there have been over 28,000,000 uploads by users in 40 content categories. The Complainant serves over 80,000,000 users per month.

The Complainant holds a number of trade mark registrations for the SLIDESHARE word mark, including US Registration No. 4,212,895 (registered September 25, 2012), European Union Registration No. 010853919 (registered November 26, 2012), and United Kingdom Registration No. 00910853919 (registered November 26, 2012) (the “Trade Mark”).

The Complainant is the registrant of the <slideshare.net> domain name (registered April 4, 2006), which it uses to run its hosting service.

The disputed domain names were registered on the following dates:

- <slidesdownloader.com>: January 19, 2024;
- <slidedownload.com>: September 24, 2024.

The Respondents are apparently located in Pakistan. The Respondents did not submit a response, and, consequently, little information is known about the Respondents. For reasons explained in Section 6.1, the Respondents are collectively referred to hereafter as “the Respondent”, unless it is necessary to refer to them separately.

The <slidesdownloader.com> disputed domain name resolves to a website which purportedly offers a “SlideShare Downloader” tool to download files. The website states that the tool is a “great & free Slideshare downloader tool used to download slides from Slideshare in PDF and PPT format”. The website features the Trade Mark and contains a disclaimer stating that “this tool is not associated with Slideshare”.

The <slidedownload.com> disputed domain name resolves to a website which purportedly offers a “Slides Downloader” tool to download files. The website states that this is “your reliable tool for downloading SlideShare files quickly”. The website also features the Trade Mark.

#### **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 names.

Notably, the Complainant contends that:

- The disputed domain names are confusingly similar to the Trade Mark. The disputed domain names incorporate the identical or nearly identical, dominant and recognizable first term of the Trade Mark (being “slide” or “slides”). Previous panels have found that inclusion of part of a mark is sufficient for a finding of confusing similarity. The additional words (“downloader” and “download”) do not distinguish the disputed domain names from the Trade Mark, because the additional terms are descriptive. Previous panels have

found that content of the websites at a disputed domain name can be considered in the assessment of confusing similarity (as evidence of the targeting of a specific trade mark), including where the disputed domain name does not contain the trade mark in full.

- The Respondent has no rights or legitimate interests in the disputed domain names. The websites at the disputed domain names enable users to download copyright materials from the Complainant's platform without subscribing to the Complainant's services by acting as a proxy and manipulating the URL link. The disputed domain names are not being utilized in connection with a bona fide offering of goods or services as the Respondent does not offer any goods or services of its own, instead, it offers free access to copyright materials ordinarily available by subscribing to the Complainant's platform.

- The Trade Mark predates the registration of the disputed domain names by many years. The Respondent uses the Trade Mark on the websites at the disputed domain names and offers users the ability to avoid signing up for the Complainant's services. The websites at the disputed domain names provide explicit instructions in relation to how to copy links from the Complainant's website. The disputed domain names are being used for illegal and fraudulent activity, as they allow users to bypass the Complainant's platform access controls.

## **B. Respondent**

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

## **6. Discussion and Findings**

To succeed, the Complainant must demonstrate that all the elements enumerated in paragraph 4(a) of the Policy have been satisfied, namely:

1. the disputed domain names are identical or confusingly similar to a trade mark or service mark in which the Complainant has rights;
2. the Respondent has no rights or legitimate interests in respect of the disputed domain names; and
3. the disputed domain names have been registered and are being used in bad faith.

The onus of proving these elements is on the Complainant.

### **6.1 Preliminary Issue: Consolidation of Multiple Respondents**

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 4.11.2.

As regards common control, the Panel notes that:

- the Respondents have not contested the Complainant's assertion that the disputed domain names are under common control;

- the content of the websites that the disputed domain names resolve to is similar (including the “downloader” provided);
- the disputed domain names both have an IP address beginning with “104.21”, an IP location in Miami, Florida, US, and are hosted by Cloudflare;
- the disputed domain names are registered with the same registrar; and
- the Respondents are both located in Pakistan.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants in a single proceeding.

## **6.2. 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 trade mark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7. This test typically involves a side-by-side comparison of the domain name and the textual components of the relevant trade mark to assess whether the trade mark is recognizable within the disputed domain name.

The Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the Trade Mark is recognizable within the disputed domain names. Each disputed domain name incorporates a dominant feature of the Trade Mark (i.e. SLIDE). The Panel considers it appropriate in the circumstances to look for broader case context to affirm its finding of confusing similarity. Here, the existence of website content which trades off the Complainant’s reputation supports a finding of confusing similarity. [WIPO Overview 3.0](#), sections 1.7 and 1.15.

In light of the above, the disputed domain names are confusingly similar to the Trade 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 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 names. 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 names such as those enumerated in the Policy or otherwise.

There is no evidence that the Respondent has ever been commonly known by the disputed domain names.

Panels have held that the use of a domain name for illegal activity (here, claimed unauthorized access) 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.

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.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain names constitutes bad faith under the Policy.

The Panel finds it unlikely that the disputed domain names were registered without knowledge of the Complainant and its Trade Mark, given the reputation of the Complainant. The Respondent's goal in registering and using the disputed domain names appears, on the balance of probabilities, to be to attract Internet users by taking unfair advantage of the Trade Mark for potential gain. This finding is reinforced by the Respondent's use of the disputed domain names to host websites that allow users to bypass the Complainant's platform access controls. This amounts to "opportunistic bad faith" under the Policy.

Panels have held that the use of a domain name for illegal activity (here, claimed unauthorized access) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

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 <slidedownload.com> and <slidesdownloader.com> be transferred to the Complainant.

*/Rebecca Slater/*

**Rebecca Slater**

Sole Panelist

Date: October 15, 2025