

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Muhammad Bilal
Case No. D2025-4041

1. The Parties

The Complainant is Scribd, Inc., United States of America (“United States”), represented by IPLA, LLP, United States.

The Respondent is Muhammad Bilal, Pakistan.

2. The Domain Name and Registrar

The disputed domain name <dlscrib.pro> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on October 2, 2025. On October 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 3, 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 (Spaceship, Inc. (Registrar)) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 6, 2025, providing the registrant and contact information disclosed by the Registrar, and requesting the Complainant to submit an amendment to the Complaint. The Complainant filed an amendment to the Complaint on the same day.

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 October 7, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 27, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on November 9, 2025.

The Center appointed Reyes Campello Estebaranz as the sole panelist in this matter on November 12, 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 has been operating since 2007. It offers online software and retail platforms for computer, electronic, and software-related goods, including subscriptions to digital content such as e-books, audiobooks, magazines, podcasts, and documents, through its official website at “www.scribd.com”. The Complainant asserts that it has served over 1,950,000 paying subscribers and currently receives more than 200,000,000 unique monthly visitors to its official website.

The Complainant holds several trademark registrations for the SCRIBD mark, including the following:

- United States Trademark Registration No. 3777227 for SCRIBD (word mark), registered on April 20, 2010, (claiming first use on March 6, 2007), in classes 9, 35, 38, and 42; and

- United States Trademark Registration No. 5898302 for SCRIBD (word mark), registered on October 29, 2019, (claiming first use in October 2013), in classes 9, 35, and 42.

(Hereinafter collectively referred to as the “SCRIBD mark”).

The Complainant further owns the domain name <scribd.com> (registered on September 24, 2006), which resolves to its official website.

The disputed domain name was registered on August 6, 2024. It resolves to an English-language website that displays the disputed domain name in its header and purports to provide “a convenient solution for those who need to download Scribd documents quickly and without cost”. The website provides no information about its operator or the registrant of the disputed domain name. It states: “Whether you’re a student, researcher, or casual reader, scribd downloader lets you download your desired content directly from Scribd in various formats including PDF, Docx, and TXT.” The site also contains a section titled “What’s a Scribd Website?”, which includes the following text:

“Scribd is an American subscription-based digital library that was founded in 2007 by Trip Adler, Jared Friedman, & Tikhon Bernstam. The platform has grown significantly since its beginning and now it offer a vast collection of content, including eBooks, audiobooks, academic papers, and even sheet music. Relatively you can say Scribd is often referred to as the Netflix of books because it contain millions of documents and content.

Scribd offer a lot of content, but most of it requires a paid subscription for access. Thus everyone pay a scribd cost to enjoy its large library of books, audiobooks, and academic papers. While some of the users find the cost worth it V/S the others see the subscription as a barrier. That’s why DLscrib and DIScrib have become available, which allow Scribd viewers to download Scribd content for free without any subscription.”

At the footer of the site, a disclaimer is displayed in dark letters over a blue background, stating: “DLscribd Is Not Affiliated With Any Websites (Such As Scribd.Com). We Do Not Store Any Of Files On Our Servers. This Is For Educational Purposes Only! You Can Download Free Public Access Document Only. We Highly Recommend Buying The Legal Account Of Scribd From The Official Website.”

The copyright notice reads: “2025 dlscib - All Rights Are Reserved.”

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 confusingly similar to its trademark, because it incorporates a slight common misspelling of the SCRIBD mark by removing the letter "d" from the end, constituting a classic case of typosquatting. The prefix "dl" is a common abbreviation for "downloader", which does not dispel confusing similarity; rather, it increases the likelihood of confusion.

The Complainant further asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The disputed domain name is not being used for a bona fide offering of goods or services; instead, the associated website provides free access to copyrighted works available only to paying subscribers of the Complainant's services. The Respondent is allegedly using the disputed domain name to divert potential customers from the Complainant. The Respondent is neither authorized to use the SCRIBD mark nor commonly known by the disputed domain name, and owns no trademark rights in it.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith. The SCRIBD mark has been extensively and continuously used since at least 2006 and is well-known internationally. It is therefore implausible that the Respondent was unaware of the Complainant's prior rights when registering the disputed domain name. The associated website provides a method to bypass the Complainant's paid service and download copyrighted materials for free by manipulating target URLs. The intentional misspelling of the mark in a clear case of typosquatting constitutes bad faith in itself. The Respondent registered and is using the disputed domain name to attract Internet users for commercial gain by creating a likelihood of confusion with the SCRIBD mark.

B. Respondent

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

6. Discussion and Findings

The Complainant has submitted all relevant assertions under the Policy, and the dispute properly falls within its scope. The Panel has the authority to decide the dispute by examining the three elements set forth in paragraph 4(a) of the Policy, taking into account all relevant evidence, annexed materials, and submissions. The Panel may also conduct limited independent research pursuant to its general powers, as provided, inter alia, in paragraph 10 of the Rules.

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, specifically the SCRIBD mark. [WIPO Overview 3.0](#), section 1.2.1.

A relevant part of the SCRIBD mark is reproduced within the disputed domain name with a common misspelling consisting of the omission of the last letter "d", and preceded by the letters "dl" that are the common abbreviation for "download" or "downloader". The Panel finds that the SCRIBD mark remains

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](#), sections 1.7, and 1.9.

Although the addition of other terms here, the letters “dl”, may bear on the assessment of the second and third elements, the Panel finds that the addition of such element 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 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.

There is no evidence that the Respondent has any rights or legitimate interests in the disputed domain name. The Respondent’s name bears no resemblance to the disputed domain name; it has no authorization to use the SCRIBD mark; and a search of WIPO’s Global Brand Database confirms that the Respondent holds no relevant trademark registrations for the terms included in the disputed domain name. ¹

The Panel observes that the Respondent has continued using the disputed domain name despite notice of this proceeding. The associated website reproduces the Complainant’s trademark, presents information about the Complainant’s services, and provides a tool for downloading the Complainant’s copyrighted materials without authorization and without paying the corresponding subscription fee. Such conduct cannot constitute a bona fide offering of goods or services under the Policy.

The Panel finds that the Respondent’s website offers a method to bypass the Complainant’s paid service and illegally access copyrighted content, which constitutes an illegitimate activity that can never confer rights or legitimate interests under the Policy. Panels have held that the use of a domain name for illegitimate or illegal activities, such as unauthorized account access/hacking, copyright infringement, distributing malware, or other types of fraud, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

¹ Noting in particular the general powers of a panel articulated inter alia in paragraphs 10 and 12 of the UDRP Rules, it has been accepted that a panel may undertake limited factual research into matters of public record if it would consider such information useful to assessing the case merits and reaching a decision. [WIPO Overview 3.0](#), section 4.8.

Therefore, 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 enumerates non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith; other circumstances may also be relevant in assessing whether a Respondent's registration and use of a domain name constitutes bad faith. [WIPO Overview 3.0](#), section 3.2.1.

The Panel finds that the long, extensive use of the SCRIBD mark for more than 16 years, its distinctive and reputed character, as well as the use in the disputed domain name of a common misspelling of the mark, suggests awareness of and targeting of the Complainant's trademark at the time of registration. The Panel notes the extensive use of the mark over the Internet, and has corroborated that Internet searches for "scribd" or "scrib" yield results overwhelmingly associated with the Complainant. Prior decisions under the Policy have recognized the reputation and well-known character of the SCRIBD mark, with which the Panel agrees. See, e.g., *Scribd, Inc. v. Domain Admin, Hush Whois Protection Ltd.*, WIPO Case No. [D2024-0477](#); *Scribd, Inc. v. Mike Milion*, WIPO Case No. [D2024-4079](#); *Scribd, Inc. v. mujeeb ahmad*, WIPO Case No. [D2024-0846](#); and *Scribd, Inc. v. Host Master, Transure Enterprise Ltd*, WIPO Case No. [D2023-2310](#).

The content of the Respondent's website, combined with its failure to respond or alter its conduct, maintaining a website that targets the Complainant and its reputed trademark, demonstrates opportunistic bad faith use of the disputed domain name under the Policy.

UDRP panels consistently hold that using a domain name for an illegitimate or illegal activity — such as hacking or unauthorized account access, copyright infringement, or any other type of fraud — constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. The Respondent's conduct meets this standard. Therefore, having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

In these circumstances, the inclusion in the Respondent's website of a non-prominent disclaimer displayed in dark text on a colored footer background would most likely go unnoticed by most Internet users and does not remedy the false suggestion of affiliation or the illegitimate activities conducted through the website. To the contrary, such a disclaimer underscores the Respondent's awareness of likely user confusion. See, e.g., *CBOCS Properties, Inc. v. Kas Is*, WIPO Case No. [D2025-1419](#), and [WIPO Overview 3.0](#), section 3.7.

Accordingly, 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 <dlscrib.pro> be transferred to the Complainant.

/Reyes Campello Estebaranz/

Reyes Campello Estebaranz

Sole Panelist

Date: November 25, 2025