ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Knorr-Bremse AG v. Michelle Laing, knorrs-bremse
Case No. D2025-4383

1. The Parties

The Complainant is Knorr-Bremse AG, Germany, represented by Bettinger Scheffelt Partnerschaft mbB, Germany.

The Respondent is Michelle Laing, knorrs-bremse, United States of America.

2. The Domain Name and Registrar

The disputed domain name <knorrs-bremse.com> is registered with Tucows Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 24, 2025. On October 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 24, 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 (Privacy redacted) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 27, 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 October 27, 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 October 29, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 18, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 21, 2025.

The Center appointed Christopher J. Pibus as the sole panelist in this matter on November 26, 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 developer and manufacturer of braking systems for rail and commercial vehicles. It was founded in Berlin in 1905 by Georg Knorr. The company's name still consists of the surname of its founder, combined with the German word “Bremse” (i.e. “brake” in English), emphasizing the Complainant's main field of activity, initially for trains. Since the 1920s, the Complainant's second main area of activity has been the development and manufacture of braking systems for commercial vehicles, for trucks, lorries, buses, trailers and special vehicles. Today, the Complainant is one of the world's largest developers and manufacturers of braking systems, with more than 19,000 employees and a worldwide turnover of EUR 4.3 billion. The Complainant is headquartered in Munich, Germany, and has more than 90 locations in 27 countries around the world. The Complainant’s website is located at “www.knorr-bremse.com”; it also owns numerous other related domain names, including < knorrbremse.com> and <knorr-bremse.net>.

With respect to trademark holdings, the Complainant owns numerous registrations around the world for its principal marks, including the following:

International trademark registration number 726778, KNORR-BREMSE (wordmark) , registered on October 20, 1999, for goods in classes 7, 9, 11, 12, 37 and 41, designating 44 jurisdictions; International trademark registration number 1483795, KNORR-BREMSE (wordmark), registered on March 8, 2019, for goods in classes 7, 9, 11, 12, 35, 37, 38, 40,41 and 42, designating 33 jurisdictions.

The Respondent appears to be an individual residing in Florida, United States of America. At the present time, the disputed domain name is inactive.

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 its trademark is highly distinctive and well-known internationally, with registrations around the world, including the United States of America where the Respondent may reside. In the absence of any response from the Respondent, the Complainant urges the Panel to find deliberate targeting of the well-known mark for improper purposes.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, the Complainant must establish each of the following elements:

(i) the disputed domain name is identical or confusingly similar to the 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.

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 KNORR-BREMSE mark is reproduced within the disputed domain name and 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.

Minor changes such as adding one letter to a mark - here, the single letter "s" - are classic examples of typo-squatting and do not prevent a finding of confusing similarity. Panels consistently hold that misspellings or extra characters leave the mark recognizable and satisfy the first element. WIPO Overview 3.0, section 1.8. - 1.9.

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. In particular, the Complainant has presented evidence of the worldwide reputation it has garnered for the KNORR-BREMSE brand, and has put forward cogent evidence and submissions that the Respondent has not been commonly known under that name, nor has it ever been licensed or otherwise authorized to register or use the mark. The Respondent has engaged in deliberate typo-squatting which is a compelling indicator of the absence of legitimate interest. 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 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.

In the present case, the Panel concludes that the Respondent must have deliberately targeted the Complainant when it adopted the disputed domain name, given the obvious typo-squatting which is evident from the composition of the disputed domain name itself. The Complainant has provided ample evidence of its well-established reputation in its portfolio of KNORR-BREMSE trademarks, and proof that the mark has acquired significant distinctiveness through more than 100 years of use in the marketplace. When choosing the disputed domain name, the Respondent must have been aware of the Complainant's rights in its mark. The registration of the disputed domain name in these circumstances was clearly abusive in nature.

Panels have found that the non-use of a domain name (including a blank or "coming soon" page) 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 (1) the distinctiveness and long-standing reputation of the Complainant's trademark, (2) the composition of the disputed domain name (which exactly mimics the unique KNORR-BREMSE combination), and (3) the blatant typo-squatting. All these factors support a finding 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 <knorrs-bremse.com> be transferred to the Complainant.

/Christopher J. Pibus/
Christopher J. Pibus
Sole Panelist
Date: December 5, 2025