

ADMINISTRATIVE PANEL DECISION

Pluxee International v. Ibrahim Mueller
Case No. D2025-4395

1. The Parties

The Complainant is Pluxee International, France, represented by Areopage, France.

The Respondent is Ibrahim Mueller, Austria.

2. The Domain Name and Registrar

The disputed domain name <pluxee.top> is registered with Dynadot 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 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 28, 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 (Super Privacy Service LTD c/o Dynadot) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 28, 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 the amended Complaint on October 30, 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 November 6, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 26, 2025. The Response was filed with the Center on November 21, 2025, and November 25, 2025.

The Center appointed Adam Taylor as the sole panelist in this matter on December 3, 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.

Each party filed a supplemental filing on December 9, 2025.

4. Factual Background

The Complainant's group operates a business supplying employee benefits and engagement solutions which was formerly part of the Sodexo group, and which has traded under the mark PLUXEE since June 2023.

The group delivers some 250 products to 37 million consumers through 500,000 clients connected with 1.7 million affiliated merchants in 29 countries. In the year to August 2024, the Complainant's revenues were EUR 1,210 million.

The Complainant owns a number of registered trade marks for PLUXEE including International Registration No. 1706936, registered on November 2, 2022, in classes 9, 16, 35, 36, 42, and 43.

The Complainant operates a website at "www.pluxeegroup.com".

The disputed domain name was registered on October 4, 2025. The Respondent registered <sodexo.top> on the same date.

As of October 24, 2025, the disputed domain name resolved to a Dynadot webpage offering the disputed domain name for sale at a price of EUR 1,977,777.77. The page featured a lengthy description including the following in the second paragraph (icons and additional punctuation removed): "THIS 100 % GENERIC 3 DICTIONARY WORDS (SLD = 2 words ([plu] and [xee]) + TLD = without any doubt [top] word ([top])) ... DOMAIN NAME WHICH WAS ... NOT REGISTERED IN "BAD FAITH" IS ... IN NO WAY ASSOCIATED / AFFILIATED WITH ANY PERSON (EXCEPT WITH ITS OWNER OF COURSE) ... NOR WITH ANY COMPANY (FOR EXAMPLE WITH THE NETHERLANDISH COMPANY "Pluxee N.V.") NOR WITH ANY TRADEMARK (FOR EXAMPLE, WITH A TRADEMARK OF THE BEFORE AS EXAMPLE NAMED COMPANY)..."

The Respondent registered <plu-xee.top> and <sod-exo.top> on November 25, 2025.

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.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent contends that:

- the disputed domain name is not identical or confusingly similar to the Complainant's trade mark because the disputed domain name consists of the distinct terms "plu" and "xee" as well as a dot/delimiter and the Top-Level Domain ("TLD") suffix "top", whereas the Complainant's mark consists only of the word PLUXEE;

- the disputed domain name is visually and phonetically distinct from the Complainant's mark, given the use of the two distinct terms plus the addition of the delimiter and TLD suffix;
- the Complainant has not registered the identical/confusingly similar term "pluxee.top" as a trade mark, whereas it would not be feasible for the Respondent to register "pluxee" on its own as a domain name;
- the Respondent will only ever use the disputed domain name with the delimiter/suffix and so it will never be confused with the term "pluxee" alone;
- the Respondent possesses legitimate interests in the disputed domain name because it is 100 percent generic;
- the term "plu" appears in Wiktionary with different meanings in various languages including in English as a symbol/abbreviation for Palikur (a tribal language spoken in French Guiana and Brazil);
- the term "xee" features in Wiktionary as a verb in Galician and a pronoun ("I"/"me") in a South American language Myba Guarani;
- Wiktionary also includes entries for "." and "top" in multiple languages, meaning "best"/"highest" in English, amongst other things;
- there is no law which forbids combination of words from different languages and no one needs to understand exactly why the words are combined – this is a common practice nowadays and should be respected;
- the Respondent is an investor and entitled to invest in such a digital asset, and the Respondent did so because someone in the world might like to use it, like the Respondent, in a way that does not infringe the Complainant's trade marks;
- the fact that the Complainant's trade mark states that the words in the mark have no meaning shows that the Complainant is unaware that the term is also a character set consisting of two dictionary words, "plu" and "xee", with many meanings and which the Respondent is entitled to use in a domain name so long as it does not infringe the Complainant's trade marks;
- the Complainant's website says that "plux" stands for positivity, the "x" symbolises the world of opportunities and "ee" represents "employee engagement" – which the Respondent fully respects, but is clearly different to the way that the Respondent uses the disputed domain name, as clearly stated on the Respondent's Dynadot offer page;
- the disputed domain name has not been registered and is not being used in bad faith;
- the disputed domain name is being offered for sale to everyone, not specifically the Complainant or its competitors;
- the price sought for the disputed domain name is a matter for the Respondent and it is irrelevant that the Complainant thinks that the price is "excessively high";
- many domain names, especially those which are 100 percent generic get sold for high prices;
- while the Respondent registered the disputed domain name with knowledge of the Complainant's rights in the PLUXEE trade mark, the Respondent's description on the Dynadot offer page shows that the Respondent did not register the disputed domain name to create confusion for illegitimate profit but instead sought to create clarity as regards the Complainant's trade mark – the description referred to the 100 percent generic nature of the disputed domain name and prominently and explicitly distanced it, twice, from the Complainant's, and any other, trade mark, a fact not mentioned by the Complainant;
- contrary to the Complainant's assertion, the Respondent considered that it did have legitimate interests in the disputed domain name because it is 100 percent generic and would never be used to infringe the Complainant's trade marks;
- it is irrelevant the Respondent is located in Austria, where the Complainant has a trade mark, because the Respondent is not using the disputed domain name in Austria or in other countries where the Complainant has a trade mark, but is simply offering it for sale;
- the Complainant does not seem concerned about the fact that many "pluxee" domain names are being offered for sale by others, or are available for registration, or that an unrelated company appears to be using <pluxee.com>, all of which shows that the Complainant particularly wants to acquire the Respondent's ".top" domain name;
- the Complainant was at fault for not registering the disputed domain name when it was available, whereas many other large companies have registered the ".top" domain names corresponding to their trade marks, indicating that the Complainant was not aware that its trade mark was 100 percent generic and that ".top" is the ultimate and most valuable domain name – the Complainant cannot simply take the disputed domain name away from the Respondent in those circumstances;

- the Respondent strongly denies that it acted fraudulently or that it needed authorisation by the Complainant to register the disputed domain name;
- the fact that the Complainant has been the victim of phishing by other people is no reason to wrongly portray the Respondent as a criminal, whereas it is the Complainant that has acted in bad faith and is guilty of reverse domain name hijacking;
- the Respondent has been registering “.top” domain names for ten years and knows which domain names it is permitted to register/own/use in a non-infringing way;
- to back up legitimacy of the disputed domain name, the Respondent has just rightfully registered <pluxee.top> and offered it for sale - this will be included for free with the disputed domain name;
- the Complainant’s own domain name, <plux.ee>, reflects its explanation of its trade mark, whereas the disputed domain name is a legitimate combination of two generic words and materially different from the Complainant’s mark;
- the Respondent will never use the disputed domain name for a parked advertising page because the Respondent wants to make clear that it has never used the disputed domain name, and to ensure that everyone who visits the website at the disputed domain name sees the description on the Dynadot offer page and that the Respondent’s only legitimate profit will derive from any sale of the disputed domain name to people who can use it in a non-infringing way;
- even if the Complainant now registered “pluxee.top” as a trade mark, this could not be used to take the earlier-registered disputed domain name from the Respondent;
- the disputed domain name could not be confused with the Complainant because the “.top” TLD suffix is different from all of those used by the Complainant for its own domain names, which the public will realise at the latest when they see the Respondent’s explanation on the Dynadot offer page; and
- the Complainant should cancel this proceeding and buy the disputed domain name at the listed price instead as, if the Complainant loses this case as expected, then its current value will probably surge, legitimately, to EUR 9,177,777.77.

Moreover, the Respondent has requested the redaction of personal data, including that “as a private individual, I do not grant you permission to publish my personal data anywhere at any time - no matter how this UDRP case will be decided. This domain name dispute concerns (apart from the (disputed) domain name and the complainant’s company name) personal data wise only the complainant <-> you <-> me ... but not the public.”

C. Complainant’s supplemental filing

The Complainant contends that it cannot be a coincidence that the Respondent registered <sodexo.top> and <sod-exo.top> on the same date as the disputed domain name, as Sodexo and Pluxee International are linked companies, that the Respondent obviously wanted to target the well-known and distinctive PLUXEE and SODEXO marks, and that the Respondent can not argue that these signs are purely generic.

D. Respondent’s supplemental filing

In summary, the Respondent contends that:

- the fact that the Respondent registered these three domain names on the same day is, as the Complainant correctly assumes, not a coincidence, but it is definitely wrong to assume that the Respondent wanted to target the SODEXO or PLUXEE trade marks;
- like the disputed domain name, the domain names <sodexo.top> and <sod-exo.top>, are 100 percent generic, consisting of the dictionary words/generic components “sod”, [-], “exo”, [.] + [top]);
- the Respondent is entitled to offer them all for sale, pointing out their 100 percent generic structure and clearly stating that they are in no way associated with the Complainant’s, or anyone’s else’s, trade marks; and
- like with the disputed domain name, the other two domain names are legitimate digital investment vehicles because, since they are 100 percent generic there is a possibility that someone in the world will be interested in them in future – to use them, like the Respondent, in a non-infringing way.

6. Discussion and Findings

6.1 Preliminary Issues

As mentioned in section 3 above, each party has made an unsolicited supplemental filing.

Paragraph 10(d) of the Rules gives the panel authority to determine the admissibility, relevance, materiality and weight of the evidence. Paragraph 10(a) requires the Panel to conduct the proceedings with due expedition.

UDRP panels have repeatedly affirmed that the party submitting an unsolicited supplemental filing should clearly show its relevance to the case and why it was unable to provide the information contained therein in its complaint or response, e.g., owing to some “exceptional” circumstance. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)), section 4.6.

In this case, the Panel has decided to admit the Complainant's filing insofar as its purpose is to inform the Panel that, on the same date as the filing, the Complainant had been informed in another UDRP case that the Respondent has also registered the domain names <sodexo.top> and <sod-exo.top> on the same date as the disputed domain name. This information was not available to the Complainant when it filed its Complaint. The Panel has also decided to admit the Respondent's supplemental filing insofar as it responds to such assertions. The relevant parts of both filings are summarised in section 4 above.

Regarding the Respondent's request for redaction of personal data, the Panel notes that paragraph 4(j) of the Policy provides that “[a]ll decisions under this Policy will be published in full over the Internet, except when an Administrative Panel determines in an exceptional case to redact portions of its decision.” This provision applies to the entirety of the Panel's Decision, including the identification of the Respondent. The Complainant has submitted evidence, and the Respondent has confirmed, that the Respondent registered the domain names <sodexo.top> and <sod-exo.top>, currently subject to a pending UDRP proceeding in WIPO Case No. [D2025-5070](#). Moreover, the Respondent confirmed that the Respondent registered the domain name <plu-xee.top> when submitting its Response to the present Complaint. The Panel notes that paragraph 4(j) of the Policy was drafted to discourage repeated cybersquatting activity, and that the provision of identifiable Respondent information is relevant not only for the present dispute, but also potential future disputes under the Policy. Here, taking into consideration both the Respondent's actions and contentions in the Response, the Panel finds the publication of the Respondent's name is proportionate to the circumstances of this case, noting both the related, pending UDRP proceeding and the possibility that the Respondent may register domain names incorporating third-party trade marks in future. Accordingly, the Respondent's request for redaction is denied.

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.

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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Dealing with the Respondent's contentions under the first element:

- That the disputed domain name is visually/phonetically distinct from the trade mark as it comprises the generic terms "plu" and "xee": As mentioned above, the first element involves a relatively straightforward comparison between the Complainant's trade mark and the disputed domain name. Where, as here, a domain name incorporates the entirety of a trade mark, it will normally be considered confusingly similar to that mark for purposes of UDRP standing, i.e., irrespective of how one might attempt to break down the component parts of the mark. [WIPO Overview 3.0](#), section 1.7.
- That the dot/delimiter and ".top" TLD visually and phonetically differentiate the disputed domain name from the trade mark: However, the applicable TLD in a domain name is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1. The meaning of such TLD may however be relevant to panel assessment of the second and third elements. [WIPO Overview 3.0](#), section 1.11.2.
- That the Respondent will only ever use the disputed domain name with the delimiter/suffix: This is also irrelevant. The first element is purely concerned with a side-by-side comparison of domain name and trade mark. In any case, as mentioned above, the TLD is disregarded under the first element.
- That the Complainant has not registered "pluxee.top" as a trade mark: Under the first element, a complainant is not required to possess a trade mark identical to the domain name, i.e., including the TLD suffix. Rather, as mentioned, above, is it sufficient that the Complainant's mark is identical or confusingly similar to the second-level domain ("SLD"), which is the case here.

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 recognised 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.

As to paragraph 4(c)(i) of the Policy, the Panel does not consider that use of the disputed domain name for a website offering the disputed domain name for sale constitutes a bona fide offering in the circumstances outlined in section 6.2C below, whereby the Panel has concluded that the Respondent registered the disputed domain name for the purpose of sale to the Complainant. Nor does the Respondent's disclaimer assist the Respondent for the reasons explained below.

The Panel deals with the Respondent's arguments under the second element in section 6.2C below.

Nor is there any evidence that paragraphs 4(c)(ii) or (iii) of the Policy are relevant in the circumstances of this case.

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 the following:

1. The Complainant's PLUXEE mark is highly distinctive.
2. The Respondent accepts that it was aware of the Complainant when it registered the disputed domain name. Indeed, the Respondent's sale listing explicitly disclaimed any connection with the Complainant's mark – referring to a company in the Complainant's group. Rather than assisting the Respondent, the Panel considers that, in the circumstances of this case, this disclaimer, and indeed the entire detailed description on the Respondent's offer page, were highly defensive moves indicating that the Respondent registered the disputed domain name with the Complainant's mark firmly in mind.
3. In these circumstances, the Panel finds it implausible that, rather than targeting the Complainant's mark, the Respondent registered the disputed domain name to reflect the constituent terms "plu" and "xee", which have highly obscure meanings, mainly in foreign languages, and that the Respondent seriously chose this combination of terms "because of the possibility that someone (whoever of our planet's population of more than 8 billion people) in the future might be interested in [it]." On balance, it seems more likely to the Panel that the Respondent has searched for, and invoked, these terms in order to try and justify its holding of the disputed domain name.
4. The Panel's conclusion is reinforced by the fact that the Respondent listed the disputed domain name for sale at approximately EUR 2 million, another strong indicator that the Complainant was the Respondent's intended purchaser of the disputed domain name.
5. The Respondent admits that it was not a coincidence that it registered the disputed domain name on the same day as the domain name <sodexo.top>, which itself reflects the highly distinctive SODEXO mark. The Respondent was spun off from Sodexo in 2024 and was therefore closely associated with that business until relatively recently. As with the disputed domain name, the Respondent attempts to justify <sodexo.top> on the basis that it includes two allegedly generic constituent terms, but the Respondent does not explain how it happened to register both domain names on the same day. In the Panel's view, this timing shows that both of the domain names were motivated by the distinctive, and related, trade marks that they reflect and not the allegedly generic terms within.

For the above reasons, the Panel concludes that the Respondent's sale offer on its webpage was directly aimed at the Complainant and, accordingly, that the Respondent registered the disputed domain name for sale to the Complainant for an amount likely in excess of the Respondent's out-of-pocket costs in accordance with paragraph 4(b)(i) of the Policy.

Dealing with the Respondent's additional contentions:

- That the disputed domain name is "100% generic": The fact that the disputed domain name contains two highly obscure dictionary terms does not make the combined term "generic". The Respondent asserts that no one needs to understand exactly why the constituent terms are combined but, in the absence of any explanation of the alleged meaning of the combined terms, there is no possible basis to conclude that the combination is "generic".
- That there is no law which forbids combination of words from different languages: That is true, but falls well short of a credible and legitimate explanation as to why the Respondent allegedly sought to combine these particular two terms in the disputed domain name.

- That the Respondent has not used and will not use the disputed domain name to infringe the Complainant's trade marks: Even if true, this is irrelevant. The Policy is not concerned with trade mark infringement but, rather, with whether or not the Respondent registered and using the disputed domain name in bad faith vis-à-vis the Complainant.
- That the Complainant's rationale for adoption of its PLUXEE mark differs from the Respondent's purpose in selecting the disputed domain name: As discussed above, the Respondent has not convinced the Panel that the Respondent selected the disputed domain name by reference to its two alleged constituent terms; the Panel does not consider that the Complainant's explanation of the reason for adoption of its own mark is of any relevance.
- That the price sought for the disputed domain name is a matter for the Respondent and it is irrelevant that the Complainant considers the price "excessively high": The Panel considers that a price of approximately EUR 2 million is "high" by any measure and that, in the circumstances of this case, it is a strong indicator that the Respondent registered the disputed domain name for sale to the Complainant by reference to its mark, rather than for sale to someone else based on a combination of two highly obscure dictionary terms.
- That many other "pluxee" domain names are being offered for sale or are available, and that a third party is apparently using <pluxee.com>, and that the Complainant failed to register the disputed domain name when it was available and that many other companies have registered ".top" versions of their marks: It is entirely up to the Complainant which "pluxee" domains to register or enforce against. None of this in any way justifies the Respondent in registering and using the disputed domain name to target the Complainant's mark.
- That the fact that the Complainant has been the victim of "phishing" by other people is no reason to portray the Respondent as criminal or fraudulent: Here, the Panel agrees with the Respondent and makes no such finding.
- That the Respondent will never use the disputed domain name for a parked advertising page because it wants to direct all visitors to the description on its webpage and to make a "legitimate profit" from selling the disputed domain name to people who will use it in a non-infringing manner: As discussed above, the Complainant considers that the Respondent registered and used the disputed domain name for sale to the Complainant and that such a step is not legitimate under the Policy. That conclusion is not affected by non-use of the disputed domain name for advertising.
- That the disputed domain name could not be confused with the Complainant because none of the Complainant's other domain names use the ".top" TLD suffix: In the Panel's view, the TLD suffix ".top" is unlikely to prevent association of the SLD, denoting the Complainant's highly distinctive mark, with the Complainant. As mentioned above, the TLD suffix is generally regarded as a standard registration requirement. If anything, the addition of the laudatory term ".top" is likely to enhance the likely connection of the disputed domain name with the Complainant.
- That, to back up legitimacy of the disputed domain name, the Respondent has just registered <plu-xee.top> and offered it for sale, and that this will be included for free if someone purchases the disputed domain name: In the Panel's view, this is plainly a defensive move in the context of this proceeding and a further indicator of bad faith.

For all the above reasons, 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 <pluxee.top> be transferred to the Complainant.

/Adam Taylor/

Adam Taylor

Sole Panelist

Date: December 17, 2025