

## **ADMINISTRATIVE PANEL DECISION**

Six Continents Hotels, Inc. v. Aryeh Mayer  
Case No. D2025-4697

### **1. The Parties**

Complainant is Six Continents Hotels, Inc., United States of America ("United States"), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States.

Respondent is Aryeh Mayer, United States.

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

The disputed domain name <staybridgegetaways.com> ("Disputed Domain Name") 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 November 13, 2025. On November 13, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On November 13, 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 Complainant on November 19, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amendment to the Complaint on November 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 Respondent of the Complaint, and the proceedings commenced on November 24, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 14, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on December 15, 2025.

The Center appointed Richard W. Page as the sole panelist in this matter on December 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**

Complainant is one of a number of companies collectively known as IHG Hotels & Resorts ("IHG"), one of the world's largest hotel groups. Companies related to Complainant own, manage, lease, or franchise, through various subsidiaries, 6,845 hotels and 1,010,756 guest rooms in about 100 countries and territories around the world. Complainant owns a portfolio of hotel brands including Staybridge Suites; Holiday Inn Hotels; Holiday Inn Express Hotels; Holiday Inn Club Vacations; Crowne Plaza Hotels & Resorts; Hotel Indigo; InterContinental Hotels & Resorts; Candlewood Suites; Six Senses Hotels, Resorts & Spas; Regent Hotels & Resorts; Kimpton Hotels & Restaurants; Hualuxe; Even Hotels; avid Hotels; and voco Hotels; and also manages one of the world's largest hotel loyalty programs, IHG Rewards Club.

Complainant's Staybridge brand was founded in 1998 and today is used in connection with 343 hotels, offering 37,548 rooms worldwide. Complainant's Staybridge brand is an extended stay hotel, offering elevated residential-style studios and suites.

Complainant is the owner of numerous registrations of the STAYBRIDGE trademark ("STAYBRIDGE Mark") including, without limitation, the following:

United States Registration No. 2,908,784 for STAYBRIDGE registered December 7, 2004 for use in connection with hotel services;

United Kingdom Registration No. UK00903582038 for STAYBRIDGE registered March 18, 2005 for use in connection with, inter alia, hotel services;

European Union Registration No. 003582038 for STAYBRIDGE registered March 18, 2005 for use in connection with, inter alia, hotel services.

In addition, Complainant (or its affiliates) owns approximately 136 registrations in approximated 75 jurisdictions worldwide for the STAYBRIDGE Mark.

Complainant is, also, the registrant of numerous domain names that contain the STARYBRIDGE Mark, including <staybridge.com>, which was created on August 1, 1997. This website is used by Complainant to communicate with its customers and to offer "extended stay hotels" in connection with the STAYBRIDGE Mark.

The Disputed Domain Name was registered on September 4, 2025 and resolves to a website which appears to be sponsored by Complainant and offers competitive services.

#### **5. Parties' Contentions**

##### **A. Complainant**

Complainant contends that the Disputed Domain Name was created on September 4, 2025 – 28 years after Complainant obtained its first registration for the STAYBRIDGE Mark.

Complainant further contends that the Disputed Domain Name is confusingly similarity to the STAYBRIDGE Mark because it contains the entirety of the STAYBRIDGE Mark.

Complainant further contends that the addition of the descriptive word “getaways” in the Disputed Domain Name does not affect the finding of confusing similarity.

Complainant submits that Respondent has no rights or legitimate interests in the Disputed Domain Name and that Complainant has not given any license or other authorization to Respondent to use the STAYBRIDGE Mark.

Complainant further submits that the website to which the Disputed Domain Name resolves offers corporate housing services which are similar to the extended stay services offered by Complainant in connection with its STAYBRIDGE Mark.

Complainant further submits that the false impression created by Respondent’s website that the corporate housing services are related to Complainant cannot be the basis for any bona fide or legitimate activity by Respondent.

Complainant further submits that there is no evidence in the file or otherwise available that Respondent has been commonly known by the Disputed Domain Name.

Complainant alleges that the actions of Respondent are in bad faith pursuant to paragraph 4(b)(iv) of the Policy.

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Name.

## **B. Respondent**

Respondent did not reply to Complainant’s contentions.

## **6. Discussion and Findings**

Paragraph 15(a) of the Rules instructs the Panel as to the principles the Panel is to use in determining the dispute: “A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules, and any rules and principles of law that it deems applicable.”

Even though Respondent has failed to file a Response or to contest Complainant’s assertions, the Panel will review the evidence proffered by Complainant to verify that the three essential elements of the claims are met. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”), section 4.3.

Paragraph 4(a) of the Policy directs that Complainant must prove each of the following three elements:

- i) that the Disputed Domain Name registered by Respondent is identical or confusingly similar to the STAYBRIDGE Mark in which Complainant has rights; and,
- ii) that Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and,
- iii) that the Disputed Domain Name has been registered and is being used in bad faith.

### **A. Identical or Confusingly Similar**

[WIPO Overview 3.0](#), section 1.2.1 states that registration of the STAYBRIDGE Mark is prima facie evidence of Complainant having enforceable rights in the STAYBRIDGE Mark.

Complainant has shown rights in respect of the STAYBRIDGE Mark for the purposes of the Policy.

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 STAYBRIDGE Mark and the Disputed Domain Name. [WIPO Overview 3.0](#), section 1.7.

The entirety of the mark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the STAYBRIDGE Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of another term, here “getaways,” 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 STAYBRIDGE 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.

Paragraph 4(c) of the Policy allows three nonexclusive methods for the Panel to conclude that Respondent has rights or a legitimate interest in the Disputed Domain Name:

- (i) before any notice to you [Respondent] of the dispute, your use of, or demonstrable preparations to use, the Disputed Domain Name or a name corresponding to the Disputed Domain Name in connection with a bona fide offering of goods or services; or
- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Disputed Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Disputed Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the STAYBRIDGE Mark.

Although the overall burden of proof in UDRP proceedings is on Complainant, panels have recognized that proving Respondent lacks rights or legitimate interests in the Disputed Domain Name may result in the difficult task of “proving a negative”, requiring information that is often primarily within the knowledge or control of Respondent. As such, where Complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Name (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Name. Respondent has not rebutted 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 the Disputed Domain Name in bad faith.

Paragraph 4(b) of the Policy sets forth four nonexclusive criteria for Complainant to show bad faith registration and use of the Disputed Domain Name:

- (i) circumstances indicating that you [Respondent] have registered or you have acquired the Disputed Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Disputed Domain Name registration to Complainant who is the owner of the [STAYBRIDGE] Mark or to a competitor of Complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the Disputed Domain Name; or
- (ii) you [Respondent] have registered the Disputed Domain Name in order to prevent the owner of the [STAYBRIDGE] Mark from reflecting the [STAYBRIDGE] Mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or
- (iii) you [Respondent] have registered the Disputed Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the Disputed Domain Name, you [Respondent] have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the [STAYBRIDGE] Mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product on your website or location.

In the present case, the Panel finds that the actions of Respondent violate paragraph 4(b)(iv) of the Policy. The Respondent used the Disputed Domain Name to resolve to a competing accommodation website displaying the Complainant's STAYBRIDGE Mark. Noting the reputation of Complainant, the distinctiveness of the STAYBRIDGE Mark, and the use of the Disputed Domain Name, it appears most likely that the Respondent was aware of the STAYBRIDGE Mark and intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the STAYBRIDGE Mark. [WIPO Overview 3.0](#), section 3.1.4. Having reviewed the record, the Panel finds Respondent's registration and use of the Disputed Domain Name constitutes bad faith under the Policy.

The Panel finds that 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 <staybridgegetaways.com> be transferred to Complainant.

*/Richard W. Page/*

**Richard W. Page**

Sole Panelist

Date: December 23, 2025