

ADMINISTRATIVE PANEL DECISION

Formagrid Inc. v. James Walker, trade llc
Case No. D2025-5121

1. The Parties

The Complainant is Formagrid Inc., United States of America (“US”), represented by Markmonitor Inc., US.

The Respondents are James Walker, Canada, and trade llc, US.

2. The Domain Names and Registrar

The disputed domain names <airtable.bio> (the “first disputed domain name”) and <airtablecareers.com> (the “second disputed domain name) are registered with NameSilo, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 9, 2025. On December 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On December 10, 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 (Privacy User #7b9468da, See PrivacyGuardian.org / Privacy User #0480387e, See PrivacyGuardian.org) and contact information in the Complaint.

The Center sent an email communication to the Complainant on December 11, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaints 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 December 15, 2025.

The Center verified that 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 December 18, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 7, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on January 8, 2026.

The Center appointed Mehmet Polat Kalafatoğlu as the sole panelist in this matter on January 14, 2026. 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, Formagrid Inc., is a US corporation doing business as AIRTABLE. The Complainant's low-code/no-code cloud-based Airtable platform for creation and editing of collaborative databases is used by large-scale enterprises to build customized connected applications for their most critical and unique workflows. It is noted that Airtable and its connected applications platform are used by over 500,000 organizations, including 80% of Fortune 100 companies.

The Complainant is the owner of numerous trademark registrations for its AIRTABLE trademark, including the following registrations in jurisdictions where the Respondents are located:

- US Trademark No. 5369973 for AIRTABLE, registered on January 2, 2018, for goods and services in Classes 9 and 42; and
- Canadian Trademark No. TMA1136922 for AIRTABLE, registered on August 5, 2022, for goods and services in Classes 9 and 42.

The Complainant also notes that it is the registrant of a number of domain names which incorporate the AIRTABLE trademark, including the domain name <airtable.com>, registered on December 10, 2003, and used as its principal website to promote its products and services.

The first disputed domain name was registered on April 12, 2025. At the time of filing the Complaint and this decision, it resolves to an inactive page. However, the record shows that it was previously resolved to a pay-per-click (PPC) page.

The second disputed domain name was registered on May 19, 2025. At the time of filing the Complaint and this decision, it resolves to a PPC page. However, the record also shows that this domain name was used for a phishing scheme. An email address with the extension of the second disputed domain name was configured to impersonate the Complainant's Head of HR Operations and to devise a fraudulent hiring process.

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. The Complainant's contentions can be summarized as follows.

First, the Complainant asserts that the disputed domain names are identical or confusingly similar to the Complainant's AIRTABLE trademark.

Second, the Complainant contends that the Respondents have no rights or legitimate interests in respect of the disputed domain names. In this regard, the Complainant, *inter alia*, submits that the Respondents are not affiliated with the Complainant in any way and have not been authorized to use and register its AIRTABLE trademark or to seek registration of any domain name incorporating said trademarks; the second

disputed domain name was used to run a fraudulent hiring process; the Respondents have not been commonly known by the disputed domain names; the Respondents have clear intention of commercial gain by using the disputed domain names; the nature of the disputed domain names are inherently misleading; and, the registrant of the first disputed domain name has a pattern of conduct of registering abusive “.bio” domain names incorporating third parties’ trademarks.

Third, the Complainant contends that the disputed domain names were registered and are being used in bad faith. In this regard, the Complainant submits, in particular, that it is implausible that the Respondents were unaware of the Complainant and its products when registering the disputed domain names. The first Respondent’s pattern of abusive domain name registrations further indicates an intent of bad faith registration. The use of the second disputed domain name to impersonate the Complainant in a phishing scheme is manifestly considered as evidence of bad faith. The registrations of the disputed domain names were made primarily with the intention to attract, for commercial gain, Internet users to the websites by creating a likelihood of confusion with the Complainant’s trademark. The mere registration of domain names that are identical or confusingly similar to a famous or widely-known trademark by an unaffiliated entity can, by itself, create a presumption of bad faith. Lastly, the current passive holding of the first disputed domain name would not preclude a finding of bad faith.

B. Respondents

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

6. Discussion and Findings

6.1. Procedural Issues: The Complainant’s Consolidation Request

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the disputed domain names are registered by the same registrant and are 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.

The disputed domain name registrants did not comment on the Complainant’s request.

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 disputed domain names are registered with the same registrar and use the same privacy service provider; they follow a similar structure by incorporating the AIRTABLE trademark with terms connected to employment or recruiting (as the top-level domain or an addition term in the second-level domain); they were registered within a short period and initially displayed PPC content; both registrant email addresses disclosed by the Registrar follow a similar structure; lastly, they used to point to the same IP address, and had Name Server date set up in an identical way. The Panel also notes that the Respondents have not objected to the consolidation request. Therefore, the Panel finds that the Complainant has established more likely than not that the disputed domain names are subject to common control.

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 (referred to below as “the Respondent”) in a single proceeding.

6.2. Substantial 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 trademark and the disputed domain name. [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 mark is reproduced within the disputed domain names. Accordingly, the first disputed domain name is identical to the mark, and the second disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although the addition of other terms here, the term “careers” in the second disputed domain name, 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 second disputed domain name and the 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.

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. In reaching this conclusion, the Panel considers the following points. The Complainant asserts that it has not authorized the Respondent to use its AIRTABLE trademark or to seek registration of the disputed domain names incorporating its trademark. Nothing in the record suggests that the Respondent is commonly known by the disputed domain names. In particular, UDRP panels have found that domain names identical to a complainant’s trademark (as is the case for the first disputed domain name) carry a high risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1. Furthermore, the first disputed domain name was previously resolved to a PPC page, which indicates the Respondent’s objective to take unfair advantage of the Complainant’s trademark for commercial gain. The fact that the first disputed domain name currently resolves to an inactive webpage does not alter the Panel’s conclusion under the second element.

Lastly, panels have held that the use of a domain name for illegal activity can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1. In the present case, the record includes unrebutted evidence that the second disputed domain name has been used for a fraudulent or false hiring process by impersonating the Complainant’s actual HR manager.

By failing to submit a Response, 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.

Accordingly, 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 considers the compositions of the disputed domain names; the registration dates of the AIRTABLE trademark and the disputed domain names; the fact that the AIRTABLE trademark is also protected at the Respondent's location; and the previous and present use of the disputed domain names by the Respondent. Considering also the Respondent's failure to present any explanation regarding the registration of the disputed domain names, the Panel finds it very likely that the Respondent was aware of the Complainant's trademark at the time of registering the disputed domain names, and acted with the objective of targeting the Complainant's trademark.

The first disputed domain name, which is identical to the Complainant's trademark, was previously resolved to a PPC page. Therefore, the Panel finds that the Respondent acted in bad faith as it intentionally attempted to attract, for commercial gain, Internet users to its website, by creating a likelihood of confusion with the Complainant's trademark. The current inactive use of the first disputed domain name does not change the Panel's conclusion under this element of the Policy.

Lastly, panels have held that the use of a domain name for illegal activity here, claimed phishing and impersonation, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the second disputed domain name constitutes bad faith under the Policy.

In the present case, the Panel considers the Respondent's failure to submit a response as a further element supporting the finding of bad faith.

Based on the available record, 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 <airtable.bio> and <airtablecareers.com> be transferred to the Complainant.

/Mehmet Polat Kalafatoglu/

Mehmet Polat Kalafatoglu

Sole Panelist

Date: January 28, 2026