

ADMINISTRATIVE PANEL DECISION

Superlift, LLC v. Zhu Di
Case No. D2025-5272

1. The Parties

The Complainant is Superlift, LLC, United States of America (“United States”), represented by MacMillan, Sobanski & Todd, LLC, United States.

The Respondent is Zhu Di, China.

2. The Domain Name and Registrar

The disputed domain name <the-superlift.com> is registered with Name.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 17, 2025. On December 17, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On December 18, 2025, the Registrar transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on December 19, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint.

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 22, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 11, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 12, 2026.

The Center appointed Ganna Prokhorova as the sole panelist in this matter on January 16, 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 is a company organized and existing under the laws of the United States. The Complainant is engaged in the development, manufacture, and commercialization of suspension lift systems and related automotive products, including suspension kits, shocks, steering components, and accessories for trucks and off-road vehicles.

The Complainant has operated under the SUPERLIFT name for many years and has established a substantial reputation in the automotive aftermarket, particularly in the field of suspension lift systems for light trucks and sport utility vehicles. The Complainant's products are distributed through authorized dealers and retailers and are marketed to consumers in the United States and internationally.

In particular, the Complainant is the owner of the trademark registrations: (i) United States trademark registration for SUPERLIFT (word), No. 4,399,830, registered on September 10, 2013, with the date of first use in commerce in the United States of January 1986, and (ii) International trademark registration for SUPERLIFT SUSPENSION (figurative), No. 1439276, registered on October 23, 2018.

The disputed domain name was registered on June 20, 2024. As of the date of this Decision, the disputed domain name resolves to a website presenting itself as a company in the automotive aftermarket sector operating under the name "SUPERLIFT". The website prominently uses the Complainant's SUPERLIFT trademarks, and displays photos of products with the Complainant's figurative SUPERLIFT SUSPENSION trademark, creating the impression of an association with, or endorsement by, the Complainant.

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:

(1) The disputed domain name is confusingly similar to the Complainant's trademark, since it incorporates the SUPERLIFT mark with the addition of the word "the", which does not prevent a finding of confusing similarity. The ".com" extension is a standard technical element which does not prevent confusing similarity.

(2) The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent registered the disputed domain name years after the Complainant established and widely used the SUPERLIFT trademark. The Respondent is not affiliated with the Complainant, has no license or authorization to use the SUPERLIFT mark, and is not commonly known by the disputed domain name. The disputed domain name resolves to a fraudulent website impersonating a company in the automotive aftermarket sector named "SUPERLIFT" and reproducing the Complainant's trademark and photos of the products multiple times, which is not a bona fide offering of goods or services. Such conduct negates any claim of legitimate interest.

(3) The disputed domain name was registered and is being used in bad faith. The Respondent registered the disputed domain name approximately four decades after the Complainant registered and began use and promotion of the SUPERLIFT mark. Registering the disputed domain name so obviously connected to a

well-known mark without authorization is itself evidence of bad faith. The Respondent used the disputed domain name primarily for commercial gain by diverting internet traffic from the Complainant's website and to attract such users, for commercial gain, to the Respondent's created website. The Respondent engages in a pattern of such conduct, as evidenced by the numerous domain names containing third party trademarks which he has registered.

B. Respondent

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

6. Discussion and Findings

Paragraph 15(a) of the Rules provides that the Panel is to decide the Complaint on the basis of the statements and documents submitted in accordance with the Policy, the Rules, and any rules and principles of law that it deems applicable.

The onus is on the Complainant to make out its case and it is apparent, both from the terms of the Policy and the decisions of past UDRP panels, that the Complainant must show that all three elements set out in paragraph 4(a) of the Policy have been established before any order can be made to transfer the disputed domain name. In UDRP cases, the standard of proof is the balance of probabilities.

To succeed in a UDRP complaint, the Complainant has to demonstrate that all the elements listed in paragraph 4(a) of the Policy have been satisfied, namely:

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

The Respondent was given proper notice of the Complaint and had the opportunity to respond. Under paragraph 5(a) of the Rules, the Respondent was required to submit its response within 20 days of commencement of the proceeding. The Respondent failed to do so.

Pursuant to paragraph 5(f) of the Rules, in the event of such a default, the Panel shall proceed to a decision based on the Complaint. However, the Respondent's default does not mean that the Complainant automatically prevails; the Complainant continues to bear the burden of proof on each element. The Panel may draw appropriate inferences from the Respondent's silence, and, where appropriate, accept as true the reasonable allegations in the Complaint that are not contradicted by evidence.

The Panel has reviewed the entire case file and the evidence provided. The Panel is also guided, where pertinent, by the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), which reflects consensus positions of UDRP panels on many common issues. The Panel will make reference to these consensus views in the analysis below as applicable.

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.

Based on the evidence submitted by the Complainant, the Panel finds that the Complainant has shown rights in respect of its SUPERLIFT mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds that the Complainant's mark is recognizable within the disputed domain name. The disputed domain name incorporates the Complainant's SUPERLIFT mark in its entirety, with the only differences being the addition of the word "the" followed by a hyphen. In accordance with [WIPO Overview 3.0](#), section 1.8, addition of descriptive, geographical, pejorative, meaningless, or otherwise terms would not prevent a finding of confusing similarity under the first element, as the Complainant's mark remains clearly recognizable within the disputed domain name.

The Panel further notes that the generic Top-Level Domain ("gTLD") ".com" is required only for technical reasons and is generally ignored for the purposes of comparison of the Complainant's mark to the disputed domain name. [WIPO Overview 3.0](#), section 1.11.1.

Accordingly, the Panel concludes that the disputed domain name is confusingly similar to the Complainant's mark and that the first element of paragraph 4(a) of the Policy is satisfied.

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.

The evidence before the Panel shows that the Respondent used the disputed domain name to impersonate the Complainant and its SUPERLIFT brand. At the time relevant to this proceeding, the disputed domain name resolves to a website purporting to operate as a company in the automotive aftermarket sector operating under the name "SUPERLIFT". The website prominently reproduced the Complainant's SUPERLIFT trademark and images of products with the Complainant's figurative SUPERLIFT SUSPENSION trademark multiple times.

The Panel finds the Respondent is not making any legitimate noncommercial or fair use of the disputed domain name. The use is clearly intended to trade on the goodwill of the Complainant's trademark and to create a false impression that the Respondent is connected with, affiliated with, or authorized by the Complainant, when no such relationship exists. There is no evidence of any use of, or demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services. Rather, the Respondent's conduct amounts to an unauthorized, infringing, and deceptive use of the disputed domain name, which cannot confer any rights or legitimate interests within the meaning of paragraph 4(a)(ii) of the Policy.

The Panel further notes that the Complainant has established trademark rights in SUPERLIFT and has confirmed that it has no relationship with the Respondent. The Respondent has not been authorized, licensed, or otherwise permitted to use the Complainant's trademark. There is also no evidence that the

Respondent is commonly known by the disputed domain name within the meaning of paragraph 4(c)(ii) of the Policy.

In light of the Respondent's failure to participate in the proceeding, the absence of any credible evidence of rights or legitimate interests, and the clear impersonation of the Complainant, the Panel concludes that the Respondent has no rights or legitimate interests in the disputed domain name.

Accordingly, the Complainant has satisfied the requirement of paragraph 4(a)(ii) of the Policy.

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 that the Respondent registered and is using the disputed domain name in bad faith under paragraph 4(b) of the Policy.

The Complainant is well known in the United States for being the company operating in the automotive aftermarket sector, specializing in lift kits and suspension systems under the SUPERLIFT name. Over the years, the Complainant has developed a consistent presence in the United States, with its first use in commerce in the United States dating back to January 1986.

Given the Complainant's reputation in the United States and the distinctive nature of its SUPERLIFT mark, the Panel finds it implausible that the Respondent was unaware of the Complainant's rights. The composition of the disputed domain name itself, mirroring the Complainant's trademark in full and adding the word "the", and resolving to a website offering high-quality lift kits and suspensions systems related to vehicles (similar to the Complainant), demonstrates clear targeting.

The disputed domain name resolves to a website attempting to impersonate or falsely suggest an affiliation with the Complainant, incorporating the Complainant's SUPERLIFT trademark in its entirety, merely adding the word "the". This formulation is a predictable variation that Internet users are likely to type when seeking to locate the Complainant's official website and was deliberately chosen to divert Internet users away from the Complainant's legitimate website. Such conduct falls squarely within paragraph 4(b)(iv) of the Policy, as the Respondent intentionally attempted to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant as to the source, sponsorship, affiliation, or endorsement of the Respondent's website.

Furthermore, the Respondent registered the disputed domain name on June 20, 2024, more than ten years after the Complainant's trademark rights were established on September 10, 2013, further supporting a finding of bad faith. All of the foregoing confirms that the Respondent had no bona fide use in mind, but rather sought to capitalize on the Complainant's reputation. Such conduct also disrupts the Complainant's business by damaging consumer trust and diverting potential customers.

The Respondent has not provided any explanation for selecting the disputed domain name, is not commonly known by it, and has not been authorized, licensed, or otherwise permitted by the Complainant to use its mark. The absence of any Response further strengthens the inference of bad faith. [WIPO Overview 3.0](#), section 4.3.

Finally, the record indicates that the Respondent demonstrates a pattern of extensive domain name registrations. Upon information and belief, the Respondent is the registrant of at least 201 domain names. Such conduct constitutes strong evidence of a pattern of abusive registrations within the meaning of paragraph 4(b)(ii) of the Policy and section 3.1.2 of the [WIPO Overview 3.0](#) and further supports a finding of bad faith. Rather than a coincidental or isolated registration, the Respondent's conduct demonstrates a

systematic practice of registering domain names corresponding to trademarks in which the Respondent has no apparent rights or legitimate interests, with the purpose of trading on the goodwill of those marks.

Considering the totality of circumstances, including the Complainant's strong trademark rights, the composition of the disputed domain name, the use of the Complainant's SUPERLIFT trademark and images of products featuring the Complainant's figurative trademark, the Respondent's registration of the disputed domain name long after the Complainant's trademark rights were established, and the evidence of the Respondent's pattern extensive domain name registrations, the Panel concludes that the disputed domain name was registered and is being used in bad faith under paragraph 4(a)(iii) of the Policy.

Accordingly, the third element of paragraph 4(a) of the Policy has been established.

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 <the-superlift.com> be transferred to the Complainant.

*/Ganna Prokhorova/
Ganna Prokhorova
Sole Panelist
Date: January 28, 2026*