

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. PHAM NGA

Case No. D2025-5317

1. The Parties

Complainant is Scribd, Inc., United States of America ("United States"), represented by IPLA, LLP, United States.

Respondent is PHAM NGA, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <slidesdownloaders.com> is registered with NameSilo, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on December 19, 2025. On December 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, 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 (User #d0b5bea9 Privacy, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to Complainant on December 22, 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 December 22, 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 December 24, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 13, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on January 15, 2026.

The Center appointed Stephanie G. Hartung as the sole panelist in this matter on January 21, 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

Complainant is a company organized under the laws of the United States that is active in the computer and software industry.

Complainant has provided evidence to enjoy by way of assignment since March 2024 rights in various registered trademarks relating to its SLIDEShare brand, *inter alia*, but not limited to, the following:

- word trademark SLIDEShare, United States Patent and Trademark Office (USPTO), registration number: 4,212,895, registration date: September 25, 2012, status: active.

Moreover, Complainant has demonstrated to own since April 4, 2006 the domain name <slideshare.net> which resolves to Complainant's main website at "www.slideshare.net", used to promote Complainant's products and related services in the computer and software industry.

Respondent, according to the Registrar verification, has an address in Viet Nam. The disputed domain name was registered on September 26, 2024. It resolves to a website at "www.slidesdownloaders.com" which purports to offer a download service for "Slideshare presentations" for free. In doing so, this website prominently and frequently displays Complainant's SLIDEShare trademark without any authorization by Complainant and further offers a technical tool to bypass the subscription requirements on Complainant's official platform, thus allowing users to download Complainant's content and materials without any financial compensation. The footer of such website contains the following disclaimer written in a comparatively small font: "SlideShare Downloader does not host any copyrighted or pirated content on its servers. All files downloaded using our tool are fetched directly from their respective content delivery networks (CDN) or original hosting servers. Additionally, this tool is not affiliated with or endorsed by SlideShare."

Complainant requests that the disputed domain name be transferred to Complainant.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name. Notably, Complainant contends that it had over 28,000,000 uploads in 40 content categories since 2006, and that it serves over 80,000,000 professionals per month on its official website at "www.slideshare.net". Hence, millions of people around the world have encountered or been exposed to Complainant's SLIDEShare trademarks, and millions of consumers have used, purchased, or otherwise subscribed to Complainant's SLIDEShare goods and services.

Complainant submits that the disputed domain name is confusingly similar to Complainant's SLIDEShare trademark, as it incorporates the identical and recognizable first term "slides" in Complainant's SLIDEShare trademark. Moreover, Complainant asserts that Respondent has no rights or legitimate interests in respect of the disputed domain name since (1) the disputed domain name was registered well after the first use dates and/or trademark registration dates of Complainant's SLIDEShare brand and after Complainant's website was registered and operational, (2) the website under the disputed domain name prominently displays Complainant's SLIDEShare trademark in its entirety and provides explicit instructions for extracting content from Complainant's platform into the tool on the disputed domain name, (3) in doing so, the website under the disputed domain name provides users the ability to download copyrighted content from

Complainant's platform without subscribing to Complainant's services by acting as a proxy and manipulating the URL link, (4) in other words, the website under the disputed domain name instructs users on how to bypass the subscription requirements on Complainant's platform, meaning that the disputed domain name offers a tool to download Complainant's content and materials without proper compensation or authorization, and (5) Complainant has never authorized Respondent to use its SLIDEShare trademarks in connection with any goods or services. Finally, Complainant argues that Respondent has registered and is using the disputed domain name in bad faith since (1) Complainant's SLIDEShare trademark rights date back to at least as early as 2006, (2) Respondent uses Complainant's SLIDEShare trademark in its entirety and advertises to its users that it offers the ability to avoid signing up for Complainant's SLIDEShare goods and services by acting as a proxy and manipulating the URL link to allow for the free access and download of copyrighted documents that are ordinarily restricted to subscribers to Complainant's website, and (3) therefore, the disputed domain name is being used for illegal and fraudulent activity because Respondent's website confuses Internet users and enables them to bypass Complainant's platform access controls, which constitutes bad faith.

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, Complainant carries the burden of proving:

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

Respondent's default in the case at hand does not automatically result in a decision in favor of Complainant, however, paragraph 5(f) of the Rules provides that if Respondent does not submit a response, in the absence of exceptional circumstances, the Panel shall decide the dispute solely based upon the Complaint. Further, according to paragraph 14(b) of the Rules, the Panel may draw such inferences from Respondent's failure to submit a Response as it considers appropriate.

A. Identical or Confusingly Similar

First, 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 Complainant's SLIDEShare 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.

Complainant has shown rights in respect of its SLIDEShare trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Also, a dominant part of such trademark, namely the first six letters forming the term "slides", is reproduced within the disputed domain name, allowing this Panel to find that Complainant's SLIDEShare trademark is at least still recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to Complainant's SLIDEShare trademark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. Such finding is also confirmed by the broader case context, namely the content of the website to which the disputed domain name resolves, and which clearly is trading off the reputation which Complainant's SLIDEShare trademark undisputedly enjoys (see e.g. Section C. below). In this context, UDRP panels agree that in specific limited instances the panel may benefit from affirmation by such broader case context as to confusing similarity between the disputed domain name and the complainant's trademark. See again [WIPO Overview 3.0](#), section 1.7.

The Panel, therefore, holds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Second, paragraph 4(c) of the Policy provides a list of circumstances in which 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 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.

In particular, Respondent has not been authorized to use Complainant's SLIDEShare trademark, either as a domain name or in any other way. Also, there is no reason to believe that Respondent's name somehow corresponds with the disputed domain name and Respondent does not appear to have any trademark rights associated with the terms “slides” and/or “slideshare” on its own. To the contrary, the disputed domain name resolves to a website at “www.slidesdownloaders.com” which purports to offer a download service for “Slideshare presentations” for free. In doing so, this website prominently and frequently displays Complainant's SLIDEShare trademark without any authorization by Complainant and further offers a technical tool to bypass the subscription requirements on Complainant's official platform, thus allowing users to download Complainant's content and materials without any financial compensation. Such making use of the disputed domain name, therefore, neither qualifies as *bona fide* nor as legitimate noncommercial or fair within the meaning of the Policy, including not under the so-called *Oki Data* principles which would indeed have required e.g. (1) to sell the trademarked SLIDEShare goods instead of offering them for free and/or (2) to accurately and prominently display the non-existing relationship between the Parties which the small font disclaimer on the footer of Respondent's website does not comply with. [WIPO Overview 3.0](#), section 2.8. Finally, and in order to round up such findings, the Panel notices that Respondent obviously is engaged in a kind of fraudulent business by allowing users to profit from Complainant's commercial products and services for free instead of paying adequate compensation. UDRP panels have long held that the use of a domain name for illegitimate/illegal activity (including any type of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel, therefore, finds the second element of the Policy has been established, too.

C. Registered and Used in Bad Faith

Third, 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.

The circumstances of this case leave no doubt that Respondent was fully aware of Complainant's rights in its undisputedly well-known SLIDEShare trademark when registering the disputed domain name and that the latter is clearly directed thereto. Moreover, using the disputed domain name, which is still confusingly similar to Complainant's well-known SLIDEShare trademark, to run a website at “www.slidesdownloaders.com” which purports to offer a download service for “Slideshare presentations” for free, prominently and frequently displays Complainant's SLIDEShare trademark without any authorization by Complainant and further offers

a technical tool to bypass the subscription requirements on Complainant's official platform, thus allowing users to download Complainant's content and materials without any financial compensation, is indicating that Respondent (1) registered the disputed domain name primarily for the purpose of disrupting Complainant's business, and (2) likely also intentionally attempted to attract, for some commercial gain, Internet users to its own website by creating a likelihood of confusion with Complainant's SLIDEShare trademark as to the source, sponsorship, affiliation or endorsement of Respondent's website. Such circumstances are evidence of registration and use of the disputed domain name in bad faith within the meaning of paragraphs 4(b)(iii) and 4(b)(iv) of the Policy, respectively. Also, UDRP panels again have long held that the use of a domain name for illegitimate/illegal activity (including any type of fraud such as allowing users to profit from Complainant's SLIDEShare commercial products and services for free instead of paying adequate compensation) constitutes bad faith. [WIPO Overview 3.0](#), section 3.4.

The Panel, therefore, finds that Complainant has established the third element of the Policy, too.

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, <slidesdownloaders.com>, be transferred to Complainant.

/Stephanie G. Hartung/

Stephanie G. Hartung

Sole Panelist

Date: February 2, 2026