

ADMINISTRATIVE PANEL DECISION

Euromaster Services et Management v. Cato Lie Case No. D2025-5333

1. The Parties

The Complainant is Euromaster Services et Management, France, represented by Dreyfus & associés, France.

The Respondent is Cato Lie, China.

2. The Domain Name and Registrar

The disputed domain name <ats-euromaster.autos> (the “Domain Name”) is registered with Spaceship, Inc. (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 Domain Name. On December 20, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 22, 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 an amended Complaint on December 26, 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 December 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 19, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on January 20, 2026.

The Center appointed Ana María Pacón as the sole panelist in this matter on January 29, 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 French company forming part of the Michelin Group. The EUROMASTER brand operates a pan-European network providing tire services and fast-fit maintenance for light vehicles, with a strong emphasis on safety and technical expertise. The Euromaster Group employs approximately 10,000 employees and operates more than 2,700 service centers across Europe. In particular, the Group maintains one of the largest European network of light and industrial vehicle maintenance centers, comprising over 2,460 locations (both company-owned and franchised) in 17 countries, including the United Kingdom.

The Complainant owns several trademark registrations worldwide, including, inter alia:

- United Kingdom Trademark Registration No. UK00001104769 for ATS, registered on November 15, 1978, covering goods in class 12;
- United Kingdom Trademark Registration No. UK00001455074 for EUROMASTER, registered on June 25, 1993, covering goods and services in classes 12 and 37; and
- French Trademark Registration No. 1624667 for EUROMASTER, registered on July 25, 1990, covering goods and services in classes 12 and 37.

The Complainant is also the registrant of several domain names reflecting its trademarks, including <euromaster.com>, registered on March 29, 1996, <atseuromaster.com>, registered since August 23, 2002, and <atseuromaster.co.uk>, registered since July 24, 2000. The Complainant's affiliate in the United Kingdom operates under the name ATS Euromaster.

The Domain Name was registered on October 14, 2025. At the time of filing of the Complaint, the Domain Name resolved to an inactive webpage. The record further indicates that email servers had been configured for the Domain Name.

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 Domain Name.

Notably, the Complainant establishes that the Domain Name is confusingly similar to its EUROMASTER and ATS trademarks, as it reproduces both marks in its entirety, separated by a hyphen. The Complainant further notes that the Domain Name is highly similar to its domain name <atseuromaster.com>, differing only by hyphenation and the applicable Top-Level Domain, which may facilitate typographical errors by Internet users and result in the diversion of Internet traffic intended for the Complainant to the Respondent.

The Complainant further submits that the Respondent has no rights or legitimate interests in respect of the Domain Name. The Complainant asserts that it has never licensed, authorized, or otherwise permitted the Respondent to use its trademarks in any manner. The Respondent is not commonly known by the Domain Name, nor is there any evidence that the Domain Name has been used in connection with a bona fide offering of goods or services, or for any legitimate noncommercial or fair use within the meaning of the Policy.

Finally, the Complainant contends that the Domain Name was registered and is being used in bad faith. The Complainant argues that, in light of the longstanding reputation and distinctiveness of its trademarks, the Respondent must have been aware of the Complainant and its trademarks rights at the time of registration of the Domain Name. The Complainant further submits that the passive holding of the Domain Name, when considered together with the configuration of email servers and the Respondent's failure to reply to cease-and-desist communications or to participate in the present proceedings, supports the finding of registration and use in bad faith.

B. Respondent

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

6. Discussion and Findings

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 Domain Name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (["WIPO Overview 3.0"](#)), section 1.7.

The Complainant has shown rights in respect of the EUROMASTER and ATS trademarks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the marks is reproduced within the Domain Name. The Panel finds that the EUROMASTER and ATS marks are clearly recognizable within the Domain Name. Accordingly, the Domain Name is confusingly similar to the marks for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Regarding the addition of the generic Top-Level Domain ("gTLD"), here ".autos", as is generally accepted, the addition of a gTLD such as ".autos" is merely a technical registration requirement and as such is typically disregarded under the first element confusing similarity test. [WIPO Overview 3.0](#), section 1.11.1.

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 the 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 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 Domain Name such as those enumerated in the Policy or otherwise.

In particular, the Panel notes the following:

- The Complainant has not authorized the Respondent to use its well-established trademarks.
- Prior to notice of this dispute, the Respondent has not used, nor made demonstrable preparations to use, the Domain Name in connection with a bona fide offering of goods or services. Paragraph 4(c)(i) of the Policy, and [WIPO Overview 3.0](#), section 2.2.
- The Respondent (as an individual, business, or other organization) has not been commonly known by the Domain Name. Paragraph 4(c)(ii) of the Policy, and [WIPO Overview 3.0](#), section 2.3.
- The Respondent is not making a legitimate noncommercial or fair use of the Domain Name without intent for commercial gain to misleadingly divert consumers or to tarnish the Complainant's trademark. Paragraph 4(c)(iii) of the Policy, and [WIPO Overview 3.0](#), section 2.4.
- The record contains no other factors demonstrating rights or legitimate interests of the Respondent in the Domain Name.

The Panel finds that the composition of the Domain Name combining two of the Complainant's trademarks carries a high risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

With respect to use, the Domain Name has resolved to an inactive website. The Panel finds that in the circumstances of this case, such passive holding does not constitute use in connection with a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor does it amount to a legitimate noncommercial or fair use under paragraph 4(c)(iii). The Panel further notes that the configuration of email servers associated with the Domain Name creates an additional risk of deceptive or abusive use, which is incompatible with any claim of legitimacy.

The Respondent has failed to submit a Response and has therefore not rebutted the Complainant's prima facie case or provided any evidence of rights or legitimate interests in the Domain Name.

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 considers that the EUROMASTER trademark enjoys a substantial reputation and that the ATS trademark is likewise well established, particularly in the United Kingdom, where the Complainant operates under the combined designation "ATS Euromaster". Given this reputation, the Panel finds it implausible that the Respondent was unaware of the Complainant and its trademarks at the time of registration of the Domain Name.

The composition of the Domain Name, which combines the Complainant's principal trademark EUROMASTER with the trademark ATS, directly referring to the Complainant's British affiliate, strongly indicates that the Respondent deliberately targeted the Complainant. Such combination is inherently suggestive of an association, or endorsement by, the Complainant. Panels have consistently held that the registration of a domain name incorporating well-known trademarks, without authorization and in the absence of any plausible legitimate use, constitutes strong evidence of bad faith registration. [WIPO Overview 3.0](#), section 3.2.1.; see also *Euromaster Services et Management v. Roshan T*, WIPO Case No. [D2018-1586](#).

With respect to use, the record shows that the Domain Name has not resolved to an active website. The Panel recalls, however, that the passive holding of a domain name does not prevent a finding of bad faith where the surrounding circumstances indicate targeting of a well-known mark, the absence of any plausible good-faith use, and the respondent's failure to come forward with any explanation for its conduct. [WIPO Overview 3.0](#), section 3.3; see also *Telstra Corporation Limited v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#).

Panels have further held that the use of a domain name for phishing or other fraudulent activity constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. In this regard, the Panel notes that the Domain Name has been configured with MX records, indicating that it has been connected to email servers. The Panel finds that such configuration, when combined with the Domain Name that is confusingly similar to the Complainant's well-known trademarks, creates a credible risk of deceptive email use, including impersonation, phishing, or other fraudulent activities.

The Panel further notes that prior to the filing of the Complaint, the Complainant sent a cease-and-desist letter to the Respondent concerning the Domain Name, to which the Respondent did not reply. While a respondent is under no obligation to respond to such correspondence, panels have held that a failure to reply to a cease-and-desist letter may, in appropriate circumstances, be taken into account as an additional factor supporting a finding of bad faith, particularly where the respondent has provided no explanation for its registration or use of the domain name. [WIPO Overview 3.0](#), section 3.10; see also *Nike, Inc. v. Azumano Travel*, WIPO Case No. [D2000-1598](#)).

Finally, the Panel notes that the Respondent initially concealed its identity through the use of a privacy service and failed to submit a Response. While neither factor alone is conclusive on its own, both may be taken into account as additional elements supporting an inference of bad faith in the overall circumstances of the case.

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 Domain Name <ats-euromaster.autos> be transferred to the Complainant.

/Ana María Pacón/

Ana María Pacón

Sole Panelist

Date: February 12, 2026