

ADMINISTRATIVE PANEL DECISION

Knorr-Bremse AG v. Paul Woods, knorr-brernse.com
Case No. D2026-0527

1. The Parties

The Complainant is Knorr-Bremse AG, Germany, represented by Bettinger Rechtsanwälte, Germany.

The Respondent is Paul Woods, knorr-brernse.com, United States of America.

2. The Domain Name and Registrar

The disputed domain name <knorr-brernse.com> is registered with Squarespace Domains II LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 8, 2026. On February 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 9, 2026, 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 (REDACTED FOR PRIVACY, knorr-brernse.com) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 10, 2026, 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 February 10, 2026.

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 February 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 9, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on March 10, 2026.

The Center appointed Haig Oghigian as the sole panelist in this matter on March 24, 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, Knorr-Bremse, AG, is a developer and manufacturer of braking systems of rail and commercial vehicles. Founded in Berlin in 1905, the Complainant is now based in Munich, Germany and operates in over 90 locations across 27 countries. The Complainant employs more than 19,000 individuals and has an annual turnover exceeding 4 billion euro.

The Complainant owns numerous trademark registrations for KNORR-BREMSE, such as but not limited to:

Trademark	Registration Number	Registration Date
KNORR-BREMSE	726778	November 20, 1999,
KNORR-BREMSE	1483795	March 8, 2019

The Complainant operates its website at <www.knorr-bremse.com> and others.

The disputed domain name <knorr-brerrnse.com>, was registered by the Respondent on January 22, 2025 and resolves to a registrar parking page.

The Respondent is Paul Woods, located in the United States of America.

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:

-The disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights.

The Complainant demonstrated ownership of numerous trademark registrations for KNORR-BREMSE in numerous jurisdictions. The Complainant states that the disputed domain name is identical to the KNORR-BREMSE mark in which the Complainant has rights, except with the misspelling "brerrnse", which in lower case bears a visual resemblance to "BREMSE". The Complainant adds that the distinctiveness of the KNORR-BREMSE mark, as well as the Complainant's industry recognition should be taken into account when assessing the first element.

- The Respondent has no rights or legitimate interests in respect of the disputed domain name.

The Complainant argues that they have demonstrated rights to the KNORR-BREMSE mark, and that there is no evidence that the Respondent is commonly known by the disputed domain name or owns any registered trademarks including the term “KNORR-BREMSE”. The Complainant further asserts that at no point has the Respondent been licensed to use its marks, nor are they affiliated with the Complainant. The Complainant adds that there is no evidence of any actual or contemplated good faith use of the disputed domain name for any bona fide offering; nor is there any evidence of legitimate noncommercial or fair use of the Complainant’s mark.

- The disputed domain name was registered and used in bad faith.

The Complainant states that the registration of the Complainant’s trademarks predates the registration of the disputed domain name by over a century. Nonetheless, the Respondent has chosen to use the distinctive term “KNORR-BREMSE” in the disputed domain name. The Complainant alleges that is very likely that the Respondent registered the disputed domain name using the KNORR-BREMSE mark intentionally in order to take advantage of the reputation of the trademark and the Complainant’s goodwill, taking advantage of the Complainant’s reputation as the disputed domain name is visually identical with the specific typographic error used in its registration. The Complainant states that the disputed domain name was used in bad faith as they reproduce the Complainant’s mark KNORR-BREMSE, which, if used to resolve to an active web page, may mislead the potential consumers by creating a likelihood of confusion with the Complainant’s mark, and then could be used to trick Internet users, or be used for phishing scams.

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 disputed domain name. WIPO Overview of WIPO Panel Views on Select UDRP Questions (“[WIPO Overview 3.1](#)”), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the mark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7 and 1.9.

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 that 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 3.1](#), 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 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 notes that the Respondent engaged in passive holding of a domain name which reproduced a misspelling of a mark, which has no common usage beyond that of the Complainant’s business. The Respondent clearly reproduced the Complainant’s mark, in its entirety, without authorization or fair use qualification.

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 3.1](#), section 3.2.1.

Panels have found that the non-use of a domain name (including a “coming soon” page) would not by itself prevent a finding of bad faith under the doctrine of passive holding. To the contrary, in looking at the totality of circumstances in each case, panels have found that the registration and non-use of a domain name can still constitute bad faith for purposes of the Policy. [WIPO Overview 3.1](#), section 3.3. Having reviewed the available record, the Panel notes the distinctiveness or reputation of the Complainant’s trademark, and the composition of the disputed domain name, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

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 name <knorr-brernse.com> be transferred to the Complainant.

/Haig Oghigian/

Haig Oghigian

Sole Panelist

Date: April 6, 2026