

## **ADMINISTRATIVE PANEL DECISION**

Greenland Watch Limited v. Samuel Chan  
Case No. D2026-0983

### **1. The Parties**

The Complainant is Greenland Watch Limited, Hong Kong, China, represented by DTMV Avocats, France.

The Respondent is Samuel Chan, Hong Kong, China.

### **2. The Domain Name and Registrar**

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

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 6, 2026. On March 9, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 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, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 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 March 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 March 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 9, 2026.

The Center appointed Linda Chang as the sole panelist in this matter on April 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 Hong Kong, China–based watch manufacturer established in 1996, with nearly three decades of experience in the watch industry. The Complainant operates as a full-service manufacturer, providing comprehensive watch development solutions including design, prototyping, production engineering, quality control, and international distribution. The Complainant manufactures timepieces in Hong Kong, China, and serves an international clientele, offering scalable production capacities and technical expertise across various market segments.

The Complainant owns France trademark GREENLAND Registration No. 4397410, registered on February 16, 2018, in classes 14 and 18.

The Complainant operates its official website at “www.greenlandwatch.com”, and the domain name of this website, <greenlandwatch.com>, was registered on March 21, 2000.

The Respondent is reportedly based in Hong Kong, China. The disputed domain name was registered on September 9, 2025. Presently, the disputed domain name resolves to an inactive webpage as a result of the Complainant’s earlier infringement notice to the website’s hosting provider. According to the Complainant’s evidence, the disputed domain name previously resolved to a website displaying the Complainant’s GREENLAND trademark and the Complainant’s address, and purported to offer and promote watches that compete with the Complainant’s core business.

#### **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:

- i) the disputed domain name is virtually identical to the Complainant’s name, trademark, and prior domain name, differing only by the insertion of a hyphen;
- ii) the Complainant owns prior trademark rights on GREENLAND and has never granted any right nor authorized in any manner the Respondent to use the trademark;
- iii) the previous website associated with the disputed domain name was suspended on March 5, 2026 following the Complainant’s infringement notification to the website’s hosting provider and is currently inactive. Before the Complainant’s notification, the website associated with the disputed domain name previously displayed the Complainant’s GREENLAND trademark and the Complainant’s address, and purported to offer and promote watches that compete with the Complainant’s core business. This indicates that the website associated with the disputed domain name was fraudulent and deliberately designed to impersonate the Complainant and misappropriate the Complainant’s business;

iv) the disputed domain name incorporates the Complainant's trademark and is used in connection with the business and/or services that are identical to those covered by the Complainant's trademark. This supports the presumption of bad faith. The Respondent used the disputed domain name to intentionally attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark, within the meaning of paragraph 4(b)(iv) of the Policy. In addition, the Respondent has used a privacy service on the disputed domain name to conceal its identity, which is a further indicative of 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 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 the GREENLAND trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The generic Top-Level Domain ("gTLD") ".com" as a standard registration requirement should be disregarded in the assessment of confusing similarity under the Policy. [WIPO Overview 3.1](#), section 1.11.1.

The entirety of the Complainant's GREENLAND trademark is reproduced within the disputed domain name. While the hyphen "-" and the term "watch" are included, the GREENLAND trademark remains clearly recognizable in the disputed domain name. The Panel finds that the extra hyphen and term do not prevent the finding of confusing similarity between the disputed domain name and the GREENLAND trademark. Accordingly, the disputed domain name is confusingly similar to the GREENLAND trademark for the purposes of the Policy. [WIPO Overview 3.1](#), sections 1.7 and 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 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.

The available record shows that:

- the Respondent is not affiliated with the Complainant and has not been authorized to use the Complainant's GREENLAND trademark in any form;

- there is no evidence proving that the Respondent holds any trademark rights corresponding to the disputed domain name, or has been commonly known by the disputed domain name;
- the website associated with the disputed domain name previously displayed the Complainant's GREENLAND trademark and address, without any prominent and accurate explanation of the relationship (or lack thereof) between the Parties, and purported to offer and promote watches that compete with the Complainant's core business. Such use of the disputed domain name indicates that the Respondent has deliberately targeted the Complainant and its GREENLAND trademark. By trading on the goodwill and reputation associated with the Complainant and its trademark, the Respondent has intended to create confusion as to the relationship between the website associated with the disputed domain name and the Complainant, and to divert Internet traffic to the website associated with the disputed domain name for commercial gain. This use cannot be regarded as a bona fide offering of goods or services, nor as a legitimate noncommercial or fair use;
- the composition of the disputed domain name, incorporating the Complainant's GREENLAND trademark in its entirety, together with the term "watch" which refers to the Complainant's core business, and being confusingly similar to the Complainant's name and prior domain name, when coupled with the Respondent's previous use of the disputed domain name, supports to affirm the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website associated with the dispute domain name; and
- no other factors demonstrate any rights or legitimate interests of the Respondent in the disputed domain name.

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 Complainant obtained the trademark registration for GREENLAND as early as February 16, 2018, which far predates the registration date of the disputed domain name (September 9, 2025). According to the Complainant's evidence and the Panel's own search, the Panel accepts that the Complainant and its GREENLAND trademark have gained a certain degree of reputation and recognition in the watch industry through its continuous use and advertising. The Respondent registered the disputed domain name that fully incorporates the Complainant's GREENLAND trademark and resolved it to a website displaying the Complainant's GREENLAND trademark and address and purportedly offering and promoting watches that compete with the Complainant's core business. The Panel determines that the Respondent had actual knowledge of the Complainant and its GREENLAND trademark at the time of registering the disputed domain name, and bad faith is found.

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.

The disputed domain name resolves to an inactive webpage at the time of the Decision, as a result of the Complainant's earlier infringement notification to the website's hosting provider. Before the Complainant's notification, the disputed domain name was used to host a website displaying the Complainant's GREENLAND trademark and address and purportedly offering and promoting watches that compete with the Complainant's core business.

The Panel holds that by selecting a domain name confusingly similar to the Complainant's GREENLAND trademark, and using it in the manner as described, the Respondent obviously intended to attract, for commercial gain, Internet users to the disputed domain name and the associated website by creating a likelihood of confusion with the Complainant's GREENLAND trademark as to the source, sponsorship, affiliation, or endorsement of the website associated with the disputed domain name, which constitutes bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

Given the Respondent's previous use of the disputed domain name, the current non-use of the disputed domain name does not prevent the Panel's finding of the Respondent's bad faith.

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 <greenland-watch.com> be transferred to the Complainant.

*/Linda Chang/*

**Linda Chang**

Sole Panelist

Date: April 30, 2026