

ADMINISTRATIVE PANEL DECISION

Great Clips, Inc. v. Serhii Korol

Case No. D2026-1110

1. The Parties

The Complainant is Great Clips, Inc., United States of America (the “United States” or “US”), represented by Greenberg Traurig, LLP, United States.

The Respondent is Serhii Korol, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <experiences-greatclips.com> is registered with Regtime Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on March 14, 2026. On March 16, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 17, 2026, 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. On March 18, 2026, the Center informed the parties in Russian and English that the language of the registration agreement for the disputed domain name was Russian. On March 20, 2026, the Complainant filed an amended Complaint containing a request that English be the language of the proceedings.

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 in Russian and English, and the proceedings commenced on March 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 14, 2026. The Respondent sent an email communication in Russian to the Center on March 26, 2026, requesting the automatic four calendar day extension for response. On the same date, the Center granted the requested extension, and the new due date for Response was fixed as April 18, 2026. The Response was filed in Russian with the Center on April 18, 2026.

The Center appointed Assen Alexiev as the sole panelist in this matter on April 27, 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.

On May 4, 2026, the Complainant filed an unsolicited Supplemental Filing. On May 7, 2026, the Respondent also filed an unsolicited Supplemental Filing.

4. Factual Background

The Complainant was established in 1982. It is a United States hair salon chain with more than 4,400 hair salons in the United States and Canada. The Complainant has about 700 franchisees, employing nearly 30,000 stylists, serving approximately 2 million customers per week. Its Facebook page has over 900,000 followers. The Complainant's official website is located at the domain name <greatclips.com>. The Complainant claims that its website includes a page at the subdomain name <experiences.greatclips.com> that offers limited-time coupon promotions.

The Complainant is the owner of various trademark registrations for GREAT CLIPS (the "GREAT CLIPS Trademark"), including the following representative registrations:

- the United States trademark GREAT CLIPS with registration No. 1341594, registered on June 11, 1985 for services in International Class 42;
- the European Union trademark GREAT CLIPS with registration No. 003849783, registered on March 13, 2009 for goods and services in International Classes 3, 35 and 44;
- the United States trademark  with registration No. 4048419, registered on November 1, 2011 for services in International Class 44; and
- the United States trademark GREAT CLIPS with registration No. 6735402, registered on May 24, 2022 for services in International Class 35.

The disputed domain name was registered on April 4, 2025. It resolves to an English language website that aggregates coupons, discounts and other promotions offered by many different entities.¹ The homepage of the website offers coupons with discounts indicated in US Dollars for use in various salons of the Complainant's chain in the United States, and displays the text:

"Great Clips | Use top Great Clips coupons, \$10 Off and \$8.99 haircut deals, and local salon discounts. Save big on trims and styles near you—printable and digital offers updated!".²

The website invites visitors to provide their email addresses if they wish to receive coupons, and displays pay-per-click ("PPC") advertising banners. It also displays the following disclaimer at the bottom of the webpage:

"© 2026 Great Coupons. All rights reserved. Third-party trademarks and brand names belong to their respective owners. The presence of any third-party trademark on Great Coupons does not signify endorsement, affiliation, or association with Great Coupons or its offerings."

¹"www.experiences-greatclips.com/merchants"

²"www.experiences-greatclips.com"

5. Parties' Contentions

A. Complainant

The Complainant states that the disputed domain name is confusingly similar to its GREAT CLIPS trademark, because it incorporates the trademark in its entirety. According to it, the addition of the term "experiences-" does not prevent a finding of confusing similarity, but increases the likelihood that Internet users would assume that they are visiting a legitimate website of the Complainant. The Complainant notes in this regard that it offers coupons through its subdomain name <experiences.greatclips.com>, to which the disputed domain name is almost identical.

According to the Complainant, the Respondent has no rights or legitimate interests in respect of the disputed domain name, because it is not commonly known by it, has no relevant trademark rights, and has not been authorised by the Complainant to register and use the disputed domain name.

The Complainant submits that the Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services or making a protected noncommercial or fair use of the disputed domain name. The Complainant states that the Respondent is profiting unlawfully from its use of the disputed domain name which diverts Internet traffic to the associated website, which offers unauthorised GREAT CLIPS coupons (some of which have already expired), deceiving customers into believing that the Respondent is associated with the Complainant. The Complainant points out that when a visitor of the website at the disputed domain name clicks on the "Get coupon" button, a PPC advertisement pops up causing the webpage to refresh. Then, another link appears which leads visitors to the Complainant's website to "redeem" the offered coupon. In the Complainant's view, the purpose of the disputed domain name is to divert Internet traffic to the associated website and entice consumers to click on the PPC links from which the Respondent derives an unfair economic benefit. This use disrupts and harms the Complainant's business, as the Complainant may lose goodwill, customers, and revenue when coupons offered are expired, are not applicable to a particular location, or are otherwise illegitimate or not authorised by the Complainant. The Complainant maintains that the Respondent's attempts to impersonate the Complainant's website have resulted in several instances of actual confusion.

The Complainant contends that the disputed domain name was registered and is being used in bad faith. According to it, the Respondent intentionally registered and is using the disputed domain name to attract, for commercial gain, Internet users to the website at the disputed domain name by creating a likelihood of confusion with the Complainant's GREAT CLIPS trademark as to the source, sponsorship, affiliation, or endorsement of the website at the disputed domain name.

The Complainant submits that the Respondent had actual knowledge of the Complainant's rights in the GREAT CLIPS trademark when the disputed domain name was registered, which is evident from the content of the associated website, which displays text about the Complainant and includes links to its website. According to the Complainant, the Respondent seeks to profit off of the disputed domain name by offering unauthorised GREAT CLIPS coupons and displaying PPC links. The Complainant notes that the included disclaimer does not actually disclaim a relationship with the Complainant and does not state that the GREAT CLIPS trademark belongs to a third party.

The Complainant points out that customers have been actually confused that the website at the disputed domain name is operated by the Complainant, and have expressed discontent with it, which harms the Complainant's brand.

The Complainant notes that on March 5, 2026, it sent a cease-and-desist letter to the Respondent, who responded on the same day.

B. Respondent

The Respondent states that its website at the disputed domain name is part of a project named “Great Coupons” - a multi-brand coupon aggregator that features promotions and coupons from more than twenty different national and international brands, and the Complainant is only one of the many categories on the website at the disputed domain name. According to the Respondent, aggregating coupons from various brands while listing their brand names is a widely accepted and legitimate business practice. The Respondent notes that its website has maintained this format for nearly a year, and was brought to the attention of the Complainant in correspondence exchanged before the filing of the Complaint. The Respondent submits that every coupon posted on the website at the disputed domain name in its “Great Clips” section is authentic and contains a direct link exclusively to the website of the Complainant, and when the “Get Coupon” button is clicked, the user is redirected to the Complainant’s official coupon redemption page at “offers.greatclips.com”. The Respondent states that it does not generate, create, or modify coupon codes, and that the website at the disputed domain name functions solely as a directory directing consumers to the Complainant’s own promotional infrastructure.

The Respondent submits that its website is branded as “Great Coupons”, not “Great Clips”, that a clear disclaimer regarding the absence of any affiliation is displayed at the bottom of every page on the website, and that the website uses the name “Great Clips” only in a descriptive nominal capacity to identify the brand whose coupons are aggregated. The Respondent explains that its website is monetised through the Google AdSense program. According to the Respondent, the fact that it has an active Google AdSense account confirms the legitimacy of its website. The Respondent adds that the email subscription form on its website contains only the text: “Need New Coupon? Enter your Email”, without any mention of the Complainant. The Respondent notes that the word “experiences” in the disputed domain name is a common English word describing the nature of the content of the associated website - user experiences and reviews of coupons.

The Respondent maintains that its website offers genuine goods or services of the respective rights holders, and that it does not offer competing services and does not divert customers away from the Complainant.

The Respondent states that the use of the text designation “Great Clips” on the website at the disputed domain name is a classic example of nominative fair use. According to the Respondent, without mentioning the name “Great Clips” it is impossible to identify the brand whose coupons are posted on the website at the disputed domain name.

The Respondent maintains that it has not registered or used the disputed domain name in bad faith. According to the Respondent, its website benefits the Complainant, because it generates traffic and customers for the Complainant. The Respondent states that it does not provide hairdressing services, does not operate salons, and is not a competitor of the Complainant. The Respondent adds that it is located in Ukraine, while the Complainant operates in the United States and Canada.

The Respondent states that it has never offered the disputed domain name for sale to the Complainant or to third parties.

The Respondent requests a finding of reverse domain name hijacking against the Complainant. According to it, the Complainant has made the false statement that the coupons offered by the Respondent are fake, and this misrepresentation is either the result of gross negligence or intentional deception. The Respondent further submits that the Complainant has fabricated evidence and has made what it refers to as “unfounded and legally untenable allegation” that the Respondent operates an illegal phishing scheme. According to the Respondent, filing the Complaint, based on knowingly false allegations of “fake coupons” and “phishing”, despite the existence of information to the contrary, constitutes an abuse of the UDRP procedure and an attempt at reverse domain name hijacking.

6. Discussion and Findings

6.1. Procedural Issue – Respondent’s Location

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and also that the administrative proceeding takes place with due expedition. Since the Respondent’s mailing address is stated to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification, it is appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceeding should continue.

Having considered all the circumstances of the case, the Panel is of the view that it should.

The Panel notes that the disputed domain name was registered as recently as April 2025. The Panel further notes that the Center sent the Notification of Complaint by email to the Respondent at its email address as registered with the Registrar, and the Respondent has requested an extension for filing a response - which had been granted – and subsequently filed the Response.

The Panel concludes that the Parties have been given a fair opportunity to present their case, and so that the administrative proceeding takes place with due expedition the Panel will proceed to a Decision accordingly.

6.2. Procedural Issue - Language of the Proceedings

The language of the Registration Agreement for the disputed domain name is Russian. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English. The Complainant requests that the language of the proceedings be English. In support of this request, the Complainant points out that the disputed domain name is composed of the English words “experiences,” “great,” and “clips”, that the website at the disputed domain name is entirely in English, and that the Respondent replied in English to a letter sent by the Complainant in English on March 5, 2026. According to the Complainant, the above shows that the Respondent is fluent in English. The Complainant adds that a translation of the Complaint in Russian would cause significant additional expenses for it and would delay the proceedings.

The Respondent requests that the language of the proceedings be Russian. In support of this request, the Respondent points out that the language of the registration agreement for the disputed domain name is Russian, that it is a citizen of Ukraine and its mother tongue is Russian, and that conducting the proceedings in English would lead to a significant disadvantage for the Respondent, requiring it to prepare legal documents in a foreign language, while the Complainant is represented by a major international law firm, which has “unlimited resources for translation”.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties’ ability to understand and use the proposed language, time and costs (see [WIPO Overview of WIPO Panel Views on Select UDRP Questions \(“WIPO Overview 3.1”\)](#), section 4.5.1).

The evidence in the case shows that the website at the disputed domain name is entirely in English and features coupons, discounts and other commercial offers many of which are denominated in US Dollars. Its “Great Clips” section lists coupons for discounts in US Dollars offered in salons located across the United States. The pre-Complaint correspondence exchanged between the Parties shows that the Respondent has an excellent command of English and understanding of the factual and legal arguments of the Complainant.

This supports the conclusion that the Respondent would not be prejudiced if the proceedings are conducted in English. Doing so would also contribute to efficiency.

Having considered the above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceedings shall be English. At the same time, the Panel will take into account the Response filed in Russian.

6.3. Procedural Issue – Supplemental Filings by the Parties

The Complainant filed an unsolicited Supplemental Filing on May 4, 2026.

Paragraph 10(d) of the Rules vests the Panel with the authority to determine the admissibility, relevance, materiality and weight of the evidence, and also to conduct the proceedings with due expedition, and paragraph 12 of the Rules expressly provides that it is for the Panel to request, in its sole discretion, any further statements or documents from the Parties it may deem necessary to decide the case.

As noted in section 4.6 of the [WIPO Overview 3.1](#), unsolicited supplemental filings are generally discouraged, unless specifically requested by the Panel. Panels have repeatedly affirmed that the party submitting or requesting to submit an unsolicited supplemental filing should clearly show its relevance to the case and why it was unable to provide the information contained therein in its complaint or response (e.g., owing to some unforeseen or exceptional circumstance).

The Complainant's Supplemental Filing does not refer to any unforeseen or exceptional circumstances that have prevented it from submitting relevant new evidence or information, necessary for the consideration of this matter. Rather, it seeks to rebut the Respondent's allegation of reverse domain name hijacking. It does not affect the findings of the Panel on the substance of the dispute, and its acceptance would not contribute to the efficiency of the present proceedings.

Considering the above, the Panel finds that there is no justification for the acceptance of the Complainant's Supplemental Filing, and decides not to admit it in the proceedings.

On May 7, 2026, the Respondent also filed an unsolicited Supplemental Filing. This submission was filed in response to the Complainant's Supplemental Filing. The Respondent explicitly states that its submission is made on a provisional basis - in the event that the Panel accepts the Complainant's Supplemental Filing, and that if the Complainant's Supplemental Filing is not accepted, the Respondent's Supplemental Filing should not be considered as well.

Taking the above into account, the Panel decides not to admit the Respondent's Supplemental Filing in the proceedings.

6.4. Substantive Issues

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 3.1](#), section 1.7.

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

The Panel finds that the GREAT CLIPS trademark is recognisable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the GREAT CLIPS trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms (here, “experiences-”) may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests and Registered and Used in Bad Faith

As noted in section 2.15 of the [WIPO Overview 3.1](#), in some cases panels assess the second and third UDRP elements together, for example where clear indicia of bad faith suggest there cannot be any respondent rights or legitimate interests. In such cases, panels have found that the facts and circumstances of the case would benefit from a joint discussion of the policy elements. The Panel considers this to be so here.

The disputed domain name fully incorporates the Complainant’s GREAT CLIPS trademark which has been widely used for many years in the United States, and combines it with the dictionary word “experiences”. This makes the disputed domain name confusingly similar to the Complainant’s trademark and almost identical to the Complainant’s subdomain name <experiences.greatclips.com> which, according to the Complainant’s uncontested assertion, it uses to offer coupons for use in its chain of Great Clips hair salons. The homepage of the Respondent’s website at the disputed domain name has the same content - it offers coupons for use in various Great Clips hair salons in the United States that are part of the Complainant’s chain. As a result, Internet users searching for the Complainant and its eventual promotions may be attracted to the Respondent’s website and believe that it is the Complainant’s. The Panel notes that the Respondent’s claimed project is “Great Coupons” but the disputed domain name incorporates “great clips” – which as combined is the Complainant’s trademark - rather than “great coupons”. The Panel infers, based on the composition of the disputed domain name combined with the content of the associated website, that by registering and using the disputed domain name the Respondent has intended to capitalize on the reputation and goodwill inherent in the Complainant’s GREAT CLIPS trademark. Furthermore, the disclaimer included at the bottom of the homepage of the Respondent’s website does not render the Respondent’s activities bona fide under the Policy. It does not state that GREAT CLIPS is a trademark that belongs to the Complainant, and not to the operator of the website, and does not disclose the absence of relationship between the two of them. When users have a chance to read the disclaimer they will have already been attracted to the Respondent’s website, under the impression that the disputed domain name is associated with the Complainant. In addition, when Internet users arrive at the homepage of the website and attempt to collect coupons, they will be exposed to various third-party advertising banners. The Respondent admits that its project is commercial, and it is likely to monetise this scheme or derive other commercial advantage from it, such as increased traffic or better rating for its website, and if this happens, it will be the result of an unfair exploitation of the goodwill of the Complainant’s trademark. The Respondent’s website also offers coupons, discounts and other promotions offered by many other entities unrelated to the Complainant. Internet users misled by the confusing similarity of the disputed domain name to the Complainant’s GREAT CLIPS trademark and to its subdomain name <experiences.greatclips.com> will be exposed to these third-party promotions, and this will presumably also bring commercial benefits to the Respondent through unfair exploitation of the goodwill of the Complainant’s trademark.

The Respondent does not explain why this scheme should be regarded as legitimate or fair use. It states that its website is a coupons aggregator collecting genuine promotions from different vendors. As such, this activity is of course not illegitimate. The Respondent also states that its website is called “Great Coupons” and not “Great Clips”. The Panel finds that the Respondent’s arguments miss the point. The problem is that the Respondent does not use a domain name that reflects its own name or brand, but exploits the Complainant’s trademark unfairly to attract visitors to its website by creating a likelihood of confusion with the said mark.

Such conduct cannot give rise to rights or legitimate interests in the disputed domain name, and supports a finding that by registering and using the disputed domain name, the Respondent has attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant.

This represents bad faith registration and use of the disputed domain name under paragraph 4(b)(iv) of the Policy.

On this basis, the Panel finds that the Respondent does not have rights or legitimate interests in the disputed domain name, and that it was registered and is being used in bad faith.

The Panel therefore finds that the second and the third elements of the Policy have 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 <experiences-greatclips.com> be transferred to the Complainant.

/Assen Alexiev/

Assen Alexiev

Sole Panelist

Date: May 7, 2026