

ADMINISTRATIVE PANEL DECISION

DMH Stallard LLP v. redo ash

Case No. D2026-1115

1. The Parties

The Complainant is DMH Stallard LLP, United Kingdom, internally represented.

The Respondent is redo ash, France.

2. The Domain Name and Registrar

The disputed domain name <dmh-stallard.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 16, 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 disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Redacted) and contact information in the Complaint. The Center sent an email communication to the Complainant on March 18, 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 amendment to the Complaint on March 18, 2026.

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 the Respondent of the Complaint, and the proceedings commenced on March 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on April 13, 2026.

The Center appointed María Alejandra López García as the sole panelist in this matter on April 17, 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 recognized law firm originally established in Brighton, United Kingdom, in 1970 as Donne Mileham & Haddock. The Complainant has over 50 years of experience, and today offers a wide range of legal services across Sussex, Surrey, and London, United Kingdom.

The Complainant owns the following trademark:

- English trademark for DMH STALLARD (word trademark), Reg. No. UK00002456661, filed on May 25, 2007, registered on November 26, 2007, and renewed, in International Classes 36, 42, and 45.

The Complainant also owns the domain name <dmhstallard.com> registered on November 10, 2004, and used as the Complainant's primary website.

The disputed domain name was registered on May 14, 2025, and at the time of this Decision resolves to an inactive website with no content on it. The Complainant has received a message through the "Contact Us" form on the Complainant's website, stating that "We recently received a phishing email from dmhstallard.com and it looks like they are trying to impersonate your company. I just wanted to give you a heads up".

The disclosed Respondent seems to be an unrelated individual located in France.

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 is almost identical to the Complainant's trademark DMH STALLARD; that the insertion of punctuation such as hyphens does not prevent a finding of confusing similarity; that since registration, the Complainant has made extensive use of DMH STALLARD in connection with its businesses and services, including through its primary website located at the domain name <dmhstallard.com>; that the Respondent does not have any rights or legitimate interest as set out by the Policy; that in particular in May 2025, the Complainant became aware that the Respondent had been operating under its trademark DMH STALLARD, including through its website located at the disputed domain name, and had allegedly attempted to impersonate the Complainant in communications with third parties; the Complainant contends that the disputed domain name has been registered and used in bad faith, given that the distinctive nature of DMH STALLARD and the longstanding use of it in connection with legal services in the United Kingdom and worldwide, the Respondent was aware of the Complainant at the time of registration; that the Respondent's conduct strongly supports a finding of bad faith under paragraph 4(b)(iv) of the Policy.

B. Respondent

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

6. Discussion and Findings

Under the Policy, the Complainant is required to prove on the balance of probabilities that:

- (i) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

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 entirety of the mark is reproduced 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.

Although the addition of other terms here, a hyphen, may bear on assessment of the second and third elements, the Panel finds the addition of such a punctuation element 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.

Concerning the generic Top-Level Domain (gTLD) ".com", it is well established that it is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), 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 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.

Panels have held that the use of a domain name for illegal activity (here, claimed phishing or other types of fraud) can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

Furthermore, the Panel finds that the composition of the disputed domain name carries a risk of implied affiliation. [WIPO Overview 3.1](#), section 2.5.1.

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

C. Registered and Used in Bad Faith

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.

In this case, the Panel finds that given the composition, nature, and timing of the disputed domain name's registration, it demonstrates that the Respondent knew the Complainant's business and the value of its trademark DMH STALLARD and did it with the Complainant in mind. [WIPO Overview 3.1](#), section 3.2.2.

Concerning the use of the disputed domain name, the Panel finds that despite its lack of content, the evidence submitted proves that the Respondent has sought to pass it off as the Complainant and commit phishing activities, all to the detriment of the Complainant's reputation and trademark value.

Panels have held that the use of a domain name for illegal activity (here, claimed phishing, or other types of fraud) constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 <dmh-stallard.com> be transferred to the Complainant.

/María Alejandra López García/

María Alejandra López García

Sole Panelist

Date: April 23, 2026