

ADMINISTRATIVE PANEL DECISION

Stove Kraft Limited v. Alex Harrison

Case No. D2026-1454

1. The Parties

The Complainant is Stove Kraft Limited, India, represented by KRIA Law, India.

The Respondent is Alex Harrison, Ireland.

2. The Domain Name and Registrar

The disputed domain name <pigeoncooker.com> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 6, 2026. On April 8, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 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 April 9, 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 amendments to the Complaint on April 13 and April 15, 2026 and an amended Complaint on April 15, 2026.

The Center verified that the Complaint together with the amendments to the Complaint and 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 April 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 6, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 7, 2026.

The Center appointed Pablo A. Palazzi as the sole panelist in this matter on May 18, 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 public limited company incorporated under the laws of India. Founded in 1994, the company employs more than 3000 employees.

The Complainant manufactures and trades in kitchen and home appliances both in India and internationally. Its product portfolio includes pressure cookers, cookware, cooktops, induction and infrared cooktops, chimneys and hobs, cooking appliances, mixer grinders, wet grinders, dough makers, fans, personal care items, and LED lighting products. The Complainant markets its products under its own brands Pigeon, Gilma, and Pigeon LED.

The Complainant holds several registered trademarks for PIGEON in India, namely Registration No. 1198490, registered from May 13, 2003, in class 21 (cookware & utensils), Registration No. 1198491, registered from May 13, 2003, in class 11 (appliances & heating) and Registration No. 2554706 registered from June 26, 2013, in class 9 (electrical & power Control). It also holds a trademark registration for PIGEON (design), under Registration No. 2554706 registered from June 26, 2013, in class 9 (electrical & power control).

The disputed domain name was registered on October 2, 2025. The disputed domain name is not active at the time of this Decision. However, at the time of filing the Complaint, the disputed domain name resolved to a website impersonating the Complainant. It had the following welcome message “Pigeon Kitchen Appliances: Best Induction and Pressure Cooker Collection”, offering for sale a range of pressure cookers and cooking appliances. It had an affiliate disclosure at the bottom of the webpage that read “pigeoncooker.com participates in the Amazon Services LLC Associates Program, an affiliate advertising program designed to provide a means for sites to earn advertising fees by advertising”.

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.

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 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 like “cooker” 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

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 is in default and has not provided any explanation as to why it registered a domain name incorporating the trademark PIGEON together with the term “cooker,” which directly relates to the Complainant’s line of products. In the absence of any Response, the Panel draws adverse inferences from the Respondent’s default and finds no plausible legitimate use for the disputed domain name. The combination of the Complainant’s trademark with a term descriptive of its core product category strongly suggests that the Respondent was aware of the Complainant’s mark at the time of registration. Such registration, without authorization, is indicative of opportunistic bad faith. The disputed domain name diverted Internet users seeking the Complainant’s products creating confusion as to the source, sponsorship, affiliation, or endorsement of the disputed domain name.

The Panel concludes that the Respondent selected and used the disputed domain name because of the reputation of the Complainant in order to attract Internet users but then divert these users to the Amazon website so that the Respondent could receive commission payments from Amazon. The fact that the disputed domain name resolved to a website which impersonated the Complainant and that used the Complainant’s trademark, to divert Internet users to the Amazon website, is conclusive evidence that the registration and use of the disputed domain name was in bad faith.

Panels have found that the non-use of a domain name 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 current 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 <pigeoncooker.com> be transferred to the Complainant.

/Pablo A. Palazzi/

Pablo A. Palazzi

Sole Panelist

Date: June 1, 2026.