

## **ADMINISTRATIVE PANEL DECISION**

Polaroid IP B.V. v. Robbins Tiffany, Tiffany Robbins, Lucia Gemma, Gemma Lucia, Fay Onions, Fay Onions, Sampson Smith, Sampson Smith, Francis Terry, Kathryne Wolf, Conner Goyette  
Case No. D2026-2061

### **1. The Parties**

The Complainant is Polaroid IP B.V., Netherlands (Kingdom of the), represented by Brinkhof N.V., Netherlands (Kingdom of the).

The Respondents are Robbins Tiffany ("Alias 1"), Tiffany Robbins ("Alias 1"), Lucia Gemma ("Alias 2"), Gemma Lucia ("Alias 2"), Fay Onions ("Alias 3"), Fay Onions ("Alias 3"), Sampson Smith ("Alias 4"), Sampson Smith ("Alias 4"), Francis Terry ("Alias 5"), Kathryne Wolf ("Alias 6") and Conner Goyette ("Alias 7"), Germany.

### **2. The Domain Names and Registrars**

The disputed domain names <polaroid-australia.com>, <polaroid-canada.com> and <polaroid-uk.com> are registered with Dynadot Inc. ("Registrar A"). The disputed domain names <polaroidireland.com> and <polaroidschweiz.com> are registered with Mat Bao Corporation ("Registrar B"). The disputed domain names <polaroid-japan.com> and <polaroidportugal.com> are registered with CNOBIN Information Technology Limited ("Registrar C").

Registrars A, B and C, are referred to individually and collectively as the "Registrar".

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 13, 2026. On May 15, 2026, the Center transmitted by email to the Registrar requests for registrar verification in connection with the disputed domain names. On May 18, 2026, May 19, 2026 and May 22, 2026, the Registrar transmitted by email to the Center their verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondent ("Respondent unknown") and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 23, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, requesting the Complainant to either file separate complaint(s) for the disputed domain names associated with different

underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on May 28, 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 Respondents of the Complaint, and the proceedings commenced on June 3, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 23, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents’ default on June 24, 2026.

The Center appointed Karen Fong as the sole panelist in this matter on July 1, 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

Founded in 1937 in the United States of America by Polaroid Corporation, the business in connection with the brand, POLAROID, is engaged in the development, production and commercialization of instant cameras and imaging products. The Complainant is the owner of the POLAROID trade mark in many jurisdictions including the following:

- European Union Trade Mark Registration No. 145938 for POLAROID registered on December 7, 1998;
- International Trade Mark Registration No.857993 for POLAROID registered on July 27, 2005; and
- International Trade Mark Registration No.1728214 for POLAROID (stylized) registered on December 12, 2022;

(individually and collectively referred to as the “Trade Mark”).

POLAROID products are sold in more than 3,500 stores across over 170 countries. The Complainant’s official website is at <polaroid.com>. The Complainant maintains a strong presence on social media, with 762,000 followers on Instagram, 371,700 likes on TikTok and 716,000 followers on Facebook. It also maintains collaborations with a wide range of commercial partners including Lacoste, Disney, Lucasfilm and Lego.

The disputed domain names (the “Domain Names”) and the websites they resolve to (the “Websites”) are set out below:

| No. | Domain Name              | Creation Date    | Reg. Alias No. | Registrar No. | Websites and Comments                                                                                                              |
|-----|--------------------------|------------------|----------------|---------------|------------------------------------------------------------------------------------------------------------------------------------|
| 1   | <polaroid-canada.com>    | October 17, 2025 | 6              | A             | The Domain Name resolved to a blocking page generated by Cloudflare. All the Domain Names registrants have the same email address. |
| 2   | <polaroid-australia.com> | October 17, 2025 | 5              | A             | As in Website 1 above until April 28, 2026 when it resolved to a website that prominently displayed the Trade Mark and purports to |

|   |                        |                   |   |   |                                                                                                     |
|---|------------------------|-------------------|---|---|-----------------------------------------------------------------------------------------------------|
|   |                        |                   |   |   | offer for sale the Complainant's products using the Complainant's product names and product images. |
| 3 | <polaroid-uk.com>      | October 17, 2025  | 7 | A | As in Website 1 above.                                                                              |
| 4 | <polaroidireland.com>  | December 24, 2025 | 3 | B | As in Website 1 above.                                                                              |
| 5 | <polaroidschweiz.com>  | December 24, 2025 | 4 | B | As in Website 1 above.                                                                              |
| 6 | <polaroid-japan.com>   | January 3, 2026   | 1 | C | As in Website 1 above.                                                                              |
| 7 | <polaroidportugal.com> | January 3, 2026   | 2 | C | As in Website 1 above.                                                                              |

## 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 Domain Names.

Notably, the Complainant contends that the Domain Names are confusingly similar to the Trade Mark in which it has rights, that the Respondents have no rights or legitimate interests with respect to the Domain Names, and that the Domain Names were registered and are being used in bad faith. The Complainant requests transfer of the Domain Names.

### B. Respondents

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

## 6. Discussion and Findings

### 6.1. Preliminary Issues

#### A. Consolidation: Multiple Respondents

The amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the Domain Name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple Domain Name registrants pursuant to paragraph 10(e) of the Rules.

The Domain Name registrants did not comment on the Complainant's request.

Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder.

In addressing the Complainant's request, the Panel will consider whether (i) the Domain Names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.11.2.

As regards common control, the Panel notes the following:

- (1) All the Domain Names comprise the Trade Mark as part of the Domain Names;
- (2) All the Domain Names were registered through the Registrar between October 17, 2025 and January 3, 2026;
- (3) The email addresses of all the Respondents are identical;
- (4) All the Domain Names at some point resolved to an identical blocking page.
- (5) All the Domain Names have the same naming structure which include the Trade Mark followed by a geographical name.
- (6) The Respondents failed to file responses.

The evidence submitted points to the fact that all the Domain Names are subject to common control by the Respondents. The above pattern evidences common conduct based on the registration and use of the Domain Names and that such conduct interferes with the Trade Mark. The Respondents had the opportunity but did not respond to the Complaint. As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different Domain Name registrants (referred to below as “the Respondent”) in a single proceeding.

## **6.2 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 trade mark and the disputed domain names. [WIPO Overview 3.1](#), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the entirety of the Trade Mark is reproduced within the Domain Names. Accordingly, the Domain Names are confusingly similar to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

While the addition of the terms “canada”, “uk”, “australia”, “portugal”, “japan”, “ireland” and “schweiz” after the Trade Mark may bear on assessment of the second and third elements, the Panel finds the addition of these words does not prevent a finding of confusing similarity between the Domain Names and the Trade Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

Based on the available record, 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.

While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible 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. 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 record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the Domain Names. 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 Domain Names such as those enumerated in the Policy or otherwise.

Based on the available record, 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 must have been aware of the Trade Mark when it registered the Domain Names given the reputation of the Trade Mark and the fact that the Trade Mark was registered long before the registration of the Domain Names. It is therefore implausible that the Respondent was unaware of the Complainant when it registered the Domain Names.

In the [WIPO Overview 3.1](#), section 3.2.2 states as follows:

"Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant's mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant's mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent's claim not to have been aware of the complainant's mark."

The fact that there is a clear absence of rights or legitimate interests coupled with the Respondent's choice of the seven Domain Names without any explanation is also a significant factor to consider (as stated in [WIPO Overview 3.1](#), section 3.2.1). The Domain Names fall into the category stated above and the Panel finds that the registration is in bad faith.

The Domain Names are also being used in bad faith. The unauthorised use of the Complainant's Trade Mark and images, and the offering for sale of the Complainant's products on Website 2 without authorisation, were calculated to mislead Internet users to believe its affiliation with the Complainant. Further, the number of Domain Names involved is itself a clear indication of a serial cybersquatting operation.

The content of Website 2 was designed to give the impression that the Respondent was authorised by, connected to, or affiliated with the Complainant when this is not the case. The Respondent exploited the fame of the Trade Mark to divert Internet users to the Website rather than the Complainant's own site, particularly as the Website contains no information clarifying the relationship (or absence of any relationship) with the Complainant. The Panel therefore concludes that the Respondent has intentionally attempted to attract, for commercial gain, by misleading Internet users into believing that the Website and the products purportedly offered and sold on it, originate from or are authorised or endorsed by the Complainant.

It is highly likely that Internet users typing the Domain Names into their browser, or arriving via a search engine, would have been looking for a site operated by the Complainant rather than the Respondent. Confusion is inevitable given that each Domain Name incorporates the Trade Mark with geographical names.

The fact that the remaining Domain Names resolved to blocking pages does not preclude a finding of bad faith. Passive or non-active use has long been recognised as consistent with bad faith, particularly where the Domain Names incorporate a well-known trade mark and no plausible good-faith use can be envisaged. This is reinforced on the present facts: Website 2 itself initially resolved to such a page before pivoting to an active impersonation website. That history demonstrates that the blocking pages are not evidence of benign intent but merely a dormant state, and that the Respondent could at any time repurpose the other Domain Names for impersonation in the same manner. The continued holding of the Domain Names by the Respondent, each comprising the Trade Mark, also operates to block the Complainant from reflecting its mark in the corresponding domains — a further indicator of bad faith. The Panel is accordingly satisfied that the blocking pages do not detract from a finding of bad faith registration and use.

The Panel therefore also concludes that the Domain Names were registered and are being used in bad faith under paragraph 4(b)(ii) and (iv) of the Policy.

Based on the available record, the Panel finds the third element of the Policy has 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 Domain Names <polaroid-australia.com>, <polaroid-canada.com>, <polaroidireland.com>, <polaroid-japan.com>, <polaroidportugal.com>, <polaroidschweiz.com> and <polaroid-uk.com> be transferred to the Complainant.

*/Karen Fong/*

**Karen Fong**

Sole Panelist

Date: July 20, 2026