

ADMINISTRATIVE PANEL DECISION

Outdoor Nation, LLC v. anouar rhroudi
Case No. D2026-2070

1. The Parties

The Complainant is Outdoor Nation, LLC, United States of America (United States), represented by Renner, Otto, Boisselle, & Sklar, LLP, United States.

The Respondent is anouar rhroudi, Morocco.

2. The Domain Name and Registrar

The disputed domain name <reellifeclothing.com> is registered with PDR Ltd. d/b/a PublicDomainRegistry.com (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 a request for registrar verification in connection with the disputed domain name. On May 18, 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 ("John Doe") and contact information in the Complaint. The Center sent an email communication to the Complainant on May 19, 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 May 20, 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 May 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 17, 2026. The Response was filed with the Center on June 17, 2026.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on June 29, 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 based in Florida in the United States. It provides outdoor apparel, performance clothing and (according to the Complaint) fishing-related apparel under a number of brands including its REEL LIFE brand.

At the time this decision is being prepared, the Complainant's website at "www.outdoornation.com/collections/reel-life" lists eleven products: three skorts in different colours, three beach long sleeve UV cover ups in different colours, three shorts in different colours and two tank dresses in different colours. Each of these products is listed under Women's fashion;

The Complainant is the owner of a number of registered trademarks in the United States:

- (1) United States Registered Trademark No 3,904,713, REEL LIFE, which has been registered in the Principal Register since January 11, 2011 in respect of men's and young men's clothing, namely, bathing suits, Bermuda shorts, board shorts, boxer shorts, dress shirts, gloves, golf shirts, briefs, pants, polo shirts, shirts, short-sleeved shirts, shorts, sport shirts, sun visors, t-shirts, tops, trousers, visors, and walking shorts in International Class 25. This trademark claims a first use in commerce in March 20, 2009;
- (2) United States Registered Trademark No 5,571,300, REEL LIFE, which has been registered in the Principal Register since September 25, 2018 in respect of sunglasses and spectacles in International Class 9 and T-shirts, long sleeve shirts, sun masks, shirts with attached sun mask, hats, caps, headwear, pullovers, sweatshirts, hooded sweatshirts, moisture wicking shirts, underwear, shorts, and visors in International Class 25. This trademark claims a first use in commerce in December 31, 2009;



- (3) United States Registered Trademark No 6,959,718, which has been registered in the Principal Register for the above goods and decals and stickers in International Class 16 and online retail store services in International Class 35 since January 24, 2023 and which claims first use in commerce from 2008 for clothing for the following device:



- (4) United States Registered Trademark No 7,302,060, which has been registered in the Principal Register since February 13, 2024 for shirts, shorts, fleece pullovers and jackets in International Class 25 and which claims first use in commerce from December 30, 2018 for the following device:

According to the Whois report, the disputed domain name was registered on March 11, 2025.

Within weeks of that registration, the disputed domain name resolved to a website offering for sale "Fishing Shirts, Hoodies, Hats, Gifts for Anglers". The products on offer cover a range of "Sports Collections", "Performance Apparel", "Hats & Beanies", "Stickers & Magnets" and mugs, tumblers, cards and other products. The clothing appears to be mostly t-shirts, long-sleeved shirts and hoodies as well as "trucker" hats (or baseball caps). Many of the garments and accessories do have some sort of fishing theme such as a slogan or image, often with a humorous twist; an example being "Don't be a dumb bass".

The landing page features an icon:



Before the Complaint was filed, the browser tab featured the wording “Reel Life Clothing®”. The “®” was removed after the Complaint was filed pointing out, amongst other things, it is false.

The prices are displayed in United States dollars. The website also displays an address for returns in North Carolina in the United States. According to the Respondent, this is the address of its print-on-demand fulfilment provider.

The Response includes evidence that the Respondent made its first sale through Shopify on April 4, 2025. Since then, the Respondent has fulfilled about 2,500 customer orders with USD 100,000 in revenues and, it is claimed, spent USD 33,000 in total advertising expenditure particularly on social media. The Respondent’s website claims that there are more than 5,000 “Reel life anglers” on its email list.

5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainant must demonstrate each of the following:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (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.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

A. Identical or Confusingly Similar

As the Complainant has trademark registrations for REEL LIFE, the Respondent concedes that the disputed domain name is identical to trademarks owned by the Complainant bearing in mind the usual practice of disregarding the “.com” generic Top-Level Domain (gTLD). WIPO Overview of WIPO Panel Views on Select UDRP Questions, (“[WIPO Overview 3.1](#)”), section 1.11.

The Respondent claims, however, that he has rights or legitimate interests in the disputed domain name and denies that the disputed domain name has been registered or used in bad faith.

B. Rights or Legitimate Interests

The second requirement the Complainant must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent’s] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or

(iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a 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.

There is no dispute between the Parties that:

- (1) The Respondent registered the disputed domain names after the Complainant began using the trademark and also after the Complainant had registered its trademark;
- (2) The Respondent is not affiliated with the Complainant;
- (3) The Complainant has not otherwise authorised the Respondent to use the disputed domain names;
- (4) The disputed domain name is not derived from the Respondent's name. Nor is there any suggestion of some other name by which the Respondent is commonly known from which the disputed domain name could be derived bearing in mind that, after the Respondent registered the disputed domain name, the Respondent started a business under the name “Reel Life Clothing”.

These factors are usually sufficient to establish a prima facie case that the Respondent does not have rights or legitimate interests in a disputed domain name.

The Respondent contends he adopted the disputed domain name independently of, and without knowledge of, the Complainant and its trademark. The Respondent further contends that he has established good faith commercial use immediately following registration of the disputed domain name and has made substantial investments in developing the brand's reputation. These are said to be incompatible with bad faith. Further still, the Respondent says there is no evidence of consumer confusion even though the Respondent has fulfilled around 2,500 customer orders over 15 months. The Respondent also contends that the parties are in different markets targeting different consumers. In this connection, the Respondent contends the Complainant addresses the premium women's performance UV-protective athletic fishing apparel segment from an outdoor sporting goods platform while the Respondent sells graphic novelty fishing apparel and stickers through a print-on-demand platform.

Some of these matters, particularly those going to subjective motivations are more appropriately dealt with under the third requirement of the Policy.

For present purposes, it is sufficient to note that at least the clothing and apparel which the Respondent offers for sale fall directly within the specification of goods for the Complainant's registered trademark.

Regardless of the Respondent's subjective intentions and noting the Respondent's website is clearly directed to the market in the United States, use of a disputed domain name identical or confusingly similar to the Complainant's trademark in respect of the goods specified in the registration appears to conflict directly with the Complainant's trademark rights and so does not qualify as use in good faith under the Policy.

In this connection, the Panel notes that evidence of confusion, when forthcoming, may be compelling. Evidence of actual confusion, however, is not a requirement under the Policy all the more so having regard to the difficulties often experienced in proving it.

The Respondent therefore has not rebutted the prima facie case that he has no rights or legitimate interests in the disputed domain name. Accordingly, the Panel finds the Complainant has established the second requirement under the Policy also.

C. Registered and Used in Bad Faith

Under the third requirement of the Policy, the Complainant must establish that the disputed domain name has been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: see e.g. *Group One Holdings Pte Ltd v. Steven Hafto* WIPO Case No. [D2017-0183](#).

The Complainant relies on the use of its exact trademark, REEL LIFE, and also the fish hook device for identical or closely related products to infer registration and use in bad faith. Further, the Complainant points to the false claim of REEL LIFE CLOTHING being a registered trademark indicated by the use of the “®” symbol. In addition, the Complainant contends, based on the absence of signage or similar business indicia, that there is no “Reel Life” business located at the “Return” address given on the Respondent’s website and the absence of other contact information on the website apart from an email address. Bearing in mind that the Respondent has been revealed to be located in Morocco, the Complainant further contends that the Respondent’s website is trying to mislead consumers into thinking it is the website of a United States-based business – that is, the Complainant.

The Respondent denies knowledge of the Complainant or an intention to trade on the Complainant’s trademark when registering the disputed domain name. The Respondent says he wished to develop a fishing-themed clothing brand. According to the Respondent, he observed extensive use of the hashtags “reel life” and “reel life fishing” on social media including in particular Instagram and TikTok and chose the name REEL LIFE based on those observations.

In the circumstances of this case, the Panel finds that the Respondent’s claim of adoption of the disputed domain name independently of the Complainant is plausible.

The disputed domain name and the Respondent’s website do use the exact phrase which is the Complainant’s registered trademark. It is, however, a widely used form of expression, including for fishing related activities.

Both the Complainant’s and the Respondent’s website also use fish hook images. As can be seen from the images shown in Section 4 above, however, while similar, the features in common are standard features of fish hooks and they are also different representations of fish hooks, both as to orientation and configuration. Further, the two Parties’ respective logos combining the common expression REEL LIFE and a representation of a fish hook are differently configured.

The Respondent’s website is directed to the market in the United States where the Complainant is located. There is also evidence that the Respondent has targeted other United States’ brands. For example, under the tab for Sports Collections, the Respondent’s website has two sub-categories: Baseball Fishing and Football Fishing. Each of these subcategories feature images which bear striking resemblance to, respectively, the Major League Baseball (MLB) and National Football League (NFL) logos:



 NFL logo	 Respondent
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It is clear, therefore, that the Respondent, while apparently located in Morocco, is familiar with the market in the United States. That also raises the possibility that the Respondent was aware of the Complainant when adopting the disputed domain name and the name of his business.

The Complaint does assert that the Complainant has established strong rights in its REEL LIFE marks in connection with apparel and related goods through longstanding and extensive use.

Apart from the facts that some products are available in the “Reel Life” collection on its “Outdoor Nation” website and the claims in the United States registered trademarks of first use dating from 2008 and 2009, however, the Complainant has not supported that claim with evidence of the kind usually expected to establish common law rights arising through reputation. [WIPO Overview 3.1](#), section 1.3. The claim of strong rights insofar as it is intended to suggest the Complainant’s trademark is well-known and has wide public recognition is therefore mere assertion.

In these circumstances, the Panel has considered whether to issue an Administrative Panel Order under paragraph 12 of the Rules inviting the Complainant to file further evidence supporting its claim. Ultimately, the Panel has decided that is not appropriate in this case.

First, it is well-established under the Policy that mere assertions of reputation are inadequate and need some supporting evidence. So, this is not an unforeseeable issue. Secondly, the Panel is unable to describe the Complainant’s trademark as having reached the level of fame and recognition as the MLB and NFL logos. Thirdly, as the Respondent has shown through some evidence, #reellife and #reellifefishing are commonly used expressions particularly on social media. Fourthly, as the Respondent points out, the Complainant’s website offers a limited product range under the REEL LIFE mark. Further, for the purposes of this proceeding, the Panel undertook a search of “reel life” on Google.¹ The first result was an IMDb listing for a TV mini-series. The second was for a graphic novel as does the “AI Overview” entry. The fourth result is to the Wikipedia “disambiguation” page which lists five music albums and a record label. It does not list any clothing brands. Returning to the Google search, under the heading “Popular Products,” there are images of two of the Respondent’s products as well as two other garment producers’ “Reel Life” garments as well as for the mini-series and the graphic novel. The first appearance of a link to the Complainant’s website appeared at the bottom of the first page before the “People also search for” listings.

The Respondent has adequately explained the use of the “Return” address in the United States as being associated with the print-on-demand fulfilment service used by the Respondent.

The Panel does not accept the Respondent’s claim that he did not realise that the “®” symbol signifies a registered trademark. No doubt it is not a legislative requirement in Morocco but its use is widespread and well-recognised even absent legislative backing. The Respondent’s website also evidences a degree of sophistication at odds with the claimed ignorance. For example, it does include a copyright notice in appropriate form: “© 2026 Reel Life Clothing.” Even accepting the use of the “®” symbol was not mistaken, however, does not necessarily mean the Respondent was targeting the Complainant as opposed to trying to give his website some spurious degree of legitimacy.

In these circumstances, having regard to the extensive use of #reellife and #reellifefishing on social media, the Panel cannot dismiss the Respondent’s claimed derivation of the disputed domain name as implausible or even unlikely. Accordingly, the Complainant has not established that the Respondent registered the disputed domain name in bad faith.

¹ Panels may undertake limited factual research into matters of public record if they consider such information useful in assessing the merits of a case. [WIPO Overview 3.1](#), section 4.8.

As the Complainant has not established registration in bad faith, it cannot establish all three requirements under the Policy and the Complaint must fail.

D. Reverse Domain Name Hijacking

The Respondent requests a ruling that the Complaint involves reverse domain name hijacking.

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16.

This is not a case where a finding of reverse domain name hijacking is warranted. As discussed in Section 5B above, the Respondent's conduct appears to be an invasion of the Complainant's registered trademark rights. While the Complainant has failed in this Complaint to prove that the Respondent subjectively intended to target the Complainant's trademark, that is because of the particular circumstances of the case which were unknown to the Complainant when the Complaint was filed against a Respondent taking advantage of a privacy service. The Complainant's failure to prove registration of the disputed domain name in bad faith, particularly after considering the circumstances of the proceeding, does not mean the Complainant's filing of this Complaint was abusive under the Policy.

6. Decision

For the foregoing reasons, the Complaint is denied.

/Warwick A. Rothnie/

Warwick A. Rothnie

Sole Panelist

Date: July 13, 2026