

ADMINISTRATIVE PANEL DECISION

Sanofi v. golizo golizo
Case No. D2026-2535

1. The Parties

The Complainant is Sanofi, France, represented by Selarl Marchais & Associés, France.

The Respondent is golizo golizo, India.

2. The Domain Name and Registrar

The disputed domain name <sanofi-stake.com> is registered with Name.com, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 11, 2026. On June 11, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 11, 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, Domain Protection Services, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 12, 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 June 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 June 22, 2026. In accordance with the Rules, paragraph 5, the due date for Response was July 12, 2026. The Respondent sent email communications to the Center on July 1, 2026. The proceedings were suspended between July 2 and 27, 2026, and reinstituted per the Complainant’s request. The new due date for Response was set as August 7, 2026. On August 10, 2026, the Center informed the Parties that it would proceed to panel appointment.

The Center appointed Leo (Yi) Liu as the sole panelist in this matter on August 13, 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 French multinational pharmaceutical company headquartered in Paris, France. It researches, develops, manufactures, and markets pharmaceutical products and operates in more than 100 countries.

The Complainant owns numerous registrations for the SANOFI trademark, including:

- French Trademark Registration No. 3831592 (semi-figurative), registered on December 9, 2011 in Classes 1, 3, 5, 9, 10, 16, 35, 38, 40, 41, 42, and 44;
- French Trademark Registration No. 1482708, registered on August 11, 1988 in Classes 1, 3, 4, 5, 10, 16, 25, 28, and 31; and
- European Union Trademark Registration No. 004182325, registered on February 9, 2006 in Classes 1, 9, 10, 16, 38, 41, 42, and 44.

The Complainant also owns domain names incorporating SANOFI, including <sanofi.com>, <sanofi.eu>, <sanofi.fr>, etc.

The disputed domain name was registered by the Respondent on April 28, 2026. The evidence shows that the disputed domain name resolved to a webpage displaying a “403 Forbidden” message. At the time of this Decision, it does not resolve to an active website.

On July 1, 2026, the Respondent sent the Center email communications acknowledging receipt of the Complaint. The Respondent stated that it did not intend to contest the proceedings, no longer wished to retain the disputed domain name, and had no objection to transfer if the Panel so decided. The proceedings were subsequently suspended and reinstituted upon the Complainant’s request.

5. Parties’ Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a cancellation of the disputed domain name.

Notably, the Complainant contends that:

- the disputed domain name is confusingly similar to its SANOFI trademark because it reproduces the mark in its entirety and merely adds the term “stake”;
- the Respondent has no rights or legitimate interests in the disputed domain name because the Respondent is not affiliated with or authorized by the Complainant and is not making a bona fide, legitimate noncommercial or fair use; and
- the disputed domain name was registered and is being used in bad faith under the doctrine of passive holding in light of the well-known and distinctive nature of the SANOFI mark.

B. Respondent

The Respondent did not submit a formal Response to the Complainant's contentions. The Respondent nevertheless sent email communications to the Center stating that it did not intend to contest the proceedings, no longer wished to retain the disputed domain name, and had no objection to the transfer of the disputed domain name if the Panel so decided.

6. Discussion and Findings

6.1 Preliminary Issue: Respondent's Consent to Remedy

Section 4.10 of the WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)) addresses cases involving a respondent's informal or unilateral consent to transfer outside the standard settlement process. Where the respondent has given consent on the record to the transfer sought, many panels will order transfer solely on that basis. Panels may nevertheless proceed to a substantive decision on the merits where, among other circumstances, there is ambiguity as to the scope of the respondent's consent.

In the present case, the Respondent stated that it did not intend to contest the proceedings and had no objection to transfer if the Panel so decided. This statement was conditional and did not constitute unequivocal consent to an immediate transfer. Moreover, the attempted settlement did not result in an agreement. The Panel also notes that the remedy sought by the Complainant is cancellation of the disputed domain name. The Panel therefore considers it appropriate to determine the Complaint on the merits under paragraph 4(a) of the Policy.

6.2 Substantive Issues

To obtain the relief it has requested, the Complainant must prove the presence of each of the three elements of the Policy: 1) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; 2) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and 3) 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 3.1](#), section 1.7.

Based on the record, the Complainant has shown rights in the SANOFI trademark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The SANOFI mark is reproduced in its entirety and remains clearly recognizable within the disputed domain name. The addition of a hyphen and the term "stake" does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), sections 1.7 and 1.8. The generic Top-Level Domain ".com" is a standard registration requirement and is disregarded in the comparison. [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.

The Complainant has established that the Respondent is not affiliated with the Complainant and has not been authorized, licensed, or otherwise permitted to use the SANOFI mark or to register a domain name incorporating it. Nothing in the record indicates that the Respondent has been commonly known by the disputed domain name. The only demonstrated use in the record consists of the disputed domain name resolving to a webpage displaying a “403 Forbidden” error message. The Respondent has not claimed that it has used, or made demonstrable preparations to use, the disputed domain name in connection with a bona fide offering of goods or services or legitimate noncommercial or fair use nor explained its incorporation of the Complainant’s well-known trademark in the disputed domain name. It merely stated that it no longer wished to retain the disputed domain name and did not intend to contest the proceedings.

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 or 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

For purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy sets out 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.

The disputed domain name was registered many years after the Complainant obtained trademark rights in SANOFI. The SANOFI mark is distinctive and well known, and the disputed domain name reproduces it in its entirety with the additional term “stake”. While the Panel acknowledges that the added term may be understood as a reference to an ownership interest in, or some other relationship with, the Complainant, the record contains no evidence of any such connection between the Respondent and the Complainant. The Panel also notes the Respondent’s statement that it did not intend to contest the proceedings. In these circumstances, the Panel finds it more likely than not that the Respondent knew of and targeted the Complainant and its mark when registering the disputed domain name.

The disputed domain name is not used for an active website. Panels have found that non-use of a domain name would not by itself prevent a finding of bad faith under the doctrine of passive holding. The Panel must examine the totality of the circumstances. [WIPO Overview 3.1](#), section 3.3. Here, the Panel takes into account the distinctiveness and reputation of the SANOFI mark, the Respondent’s failure to provide any explanation, and the Respondent’s statement that it no longer wished to retain the disputed domain name. In the circumstances, the passive holding of the disputed domain name does not prevent a finding of bad faith.

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 <sanofi-stake.com> be cancelled.

/Leo (Yi) Liu/

Leo (Yi) Liu

Sole Panelist

Date: August 27, 2026