ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Tuan Le
Case No. D2026-3439

1. The Parties

The Complainant is Scribd, Inc., United States of America ("United States" or "US"), represented by IPLA, LLP, United States.

The Respondent is Tuan Le, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <downslides.com> is registered with Unstoppable Domains Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on August 3, 2026. On August 4, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 5, 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 (Unstoppable Privacy Service LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 6, 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 August 10, 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 August 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 31, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on September 1, 2026.

The Center appointed Stefan Bojovic as the sole panelist in this matter on September 3, 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 United States company active in the fields of computer and software services. The Complainant operates the SlideShare platform, which allows users to host and share professional content, including presentations and documents.

The Complainant, along with its affiliates, is the owner of the SLIDESHARE trademark which is protected by various trademark registrations, including the US Trademark Registration No. 4212895 for SLIDESHARE, registered on September 25, 2012.

The Complainant also owns the domain name <slideshare.net>, registered on April 4, 2006, which reflects its SLIDESHARE trademark and is used by the Complainant as a principal website of the SlideShare platform.

The disputed domain name was registered on January 2, 2026 and it resolves to a website under the name "SlideShare Downloader" that purportedly offers an online service enabling users to, without registration or subscription, download presentations available on the Complainant's SlideShare platform. The website invites users to enter or paste a SlideShare URL and states that presentations can be downloaded in various formats, including PDF, PPT, PPTX, and ZIP.

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 name is confusingly similar to the Complainant's SLIDESHARE trademark because it incorporates the identical or nearly identical dominant and recognizable first portion "slides" of the Complainant's trademark. Prior UDRP panels have held that the incorporation of part of a trademark is sufficient to establish that the disputed domain name is confusingly similar to a complainant's registered trademark. Moreover, the addition of a descriptive term such as "down", i.e. a common abbreviation for downloader, does not distinguish the disputed domain name from the Complainant's SLIDESHARE trademark. Finally, the Complainant indicates that UDRP panels have held that the content of a website may provide an indication as to a respondent's targeting of a specific trademark through the disputed domain name chosen, and the context in which the disputed domain name is being used is helpful to assess confusing similarity under the first element of the Policy.

With reference to rights or legitimate interests in respect of the disputed domain name, the Complainant contends that it is not aware of any trademark rights, domain name rights, or other rights that the Respondent has relating to the SLIDESHARE trademark, nor has the Complainant ever authorized the Respondent to use its SLIDESHARE trademark in connection with any goods or services. Additionally, there is no indication that the Respondent is commonly known by the disputed domain name. The Complainant holds that the use of the disputed domain name for illegal activity, such as to provide unauthorized access to a third-party platform, does not amount to a bona fide offering of goods or services to confer any legitimate interest in the disputed domain name. The disputed domain name is not being utilized in connection with a bona fide offering of goods or services, as it currently does not offer any services or goods of its own, but creates free and unauthorized access to copyrighted works that would only be accessible in full by paying for Complainant's services. Further, it uses the Complainant's trademark to drive internet traffic to the disputed domain name that converts files. According to the Complainant, this is concrete evidence that the

Respondent is intentionally and fraudulently using the Complainant's trademarks to redirect potential customers away from the Complainant's services.

With reference to the circumstances evidencing bad faith, the Complainant indicates that the Complainant and its predecessors-in-interest have been substantially, exclusively, and continuously using the SLIDESHARE trademark since at least as early as 2006, when Complainant's predecessor-in-interest first acquired the domain name <slideshare.net>, many years before the Respondent registered the disputed domain name. Upon registering the confusingly similar disputed domain name, the Respondent began advertising to its users that it offers the ability to avoid signing up for the Complainant's services by acting as a proxy and manipulating the target URL to allow for the free download of copyrighted documents. Therefore, the disputed domain name is being used for illegal activity which constitutes bad faith. Thus, the Respondent is using the disputed domain name to redirect traffic away from the Complainant and the services it offers. The Complainant contends that the Respondent uses the disputed domain name in bad faith to intentionally attempt to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's trademark, as to the source, sponsorship, affiliation, or endorsement of the website to which the disputed domain name resolves.

B. Respondent

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

6. Discussion and Findings

According to paragraph 15(a) of the Rules: "A Panel shall decide a 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." Paragraph 4(a) of the Policy stipulates that the complainant must prove each of the following:

(i) that the disputed domain name registered by the respondent is identical or confusingly similar to a trademark or service mark in which the complainant has rights;

(ii) that the respondent has no rights or legitimate interests in respect of the disputed domain name; and

(iii) that 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 the SLIDESHARE trademark for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The Panel notes that the disputed domain name incorporates the term "slides", which reflects the first component "SLIDE" and the initial letter of the second component "SHARE" of the Complainant's SLIDESHARE trademark, in combination with the term "down", which corresponds to the "downloader" service purportedly offered on the website to which the disputed domain name resolves. The Panel is aware that the portion "slides" can be perceived as a dictionary word in English, however, the circumstances of this case indicate that the Respondent's intention was to use this portion as the reference to the Complainant's SLIDESHARE trademark and the SlideShare platform.

Although the general rule of determining confusing similarity between the trademark and a domain name is side-by-side textual comparison, in some instances, panels have taken note of the content of the website associated with a domain name to confirm confusing similarity whereby it appears prima facie that the respondent seeks to target a trademark through the disputed domain name. WIPO Overview 3.1, section 1.15.

In the present case, the website associated with the disputed domain name prominently displays the Complainant's SLIDESHARE trademark in its entirety and the website itself is titled "SlideShare Downloader", enabling users to, without registration or subscription, download presentations available on the Complainant's SlideShare platform.

When all these factors are taken into account, the circumstances indicate that the disputed domain name targets the Complainant and its SLIDESHARE trademark, while the "slides" portion of the disputed domain name is intended to refer to the Complainant's trademark and platform rather than to the dictionary word in English. Under similar circumstances, similar conclusions regarding confusing similarity of the "slides" element with the Complainant's SLIDESHARE trademark have been drawn by a number of previous panels (see for example *Scribd, Inc. v. om parkash, Soccer Gears Store*, WIPO Case No. D2026-1728, *Scribd, Inc. v. Host Master, Njalla Okta LLC*, WIPO Case No. D2026-1729, *Scribd, Inc. v. Webs Pulse and Sohail Habib*, WIPO Case No. D2026-1609 and *Scribd, Inc. v. PHAM NGA*, WIPO Case No. D2025-5317).

Having in mind the above, the Panel finds the Complainant's trademark is recognizable within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Complainant's SLIDESHARE trademark for the purposes of the Policy. WIPO Overview 3.1, section 1.7.

Although the addition of other terms (here, "down") 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 Complainant's trademark for the purposes of the Policy. WIPO Overview 3.1, section 1.8.

In addition, it is well established that ".com", as a generic Top-Level Domain, is disregarded in the assessment of the confusing similarity between the disputed domain name and the trademark. WIPO Overview 3.1, section 1.11.1.

The Panel, therefore, finds that 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 notes that according to the record there is no relationship between the Respondent and the Complainant and that the Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant's SLIDESHARE trademark. There appears to be no element from which the Panel could infer the Respondent's rights or legitimate interests in the disputed domain name, or that the Respondent might be commonly known by the disputed domain name.

The disputed domain name resolves to a website under the name "SlideShare Downloader" that purportedly offers an online service enabling users to, without registration or subscription, download presentations available on the Complainant's SlideShare platform. This way, Internet users can circumvent the subscription for the services offered on the Complainant's platform which does not represent a bona fide offering of services.

Panels have held that the use of a domain name for illegitimate activity (here, claimed circumvention of subscription for the Complainant's services, that can be perceived as a type of fraud) can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

Having in mind the above, 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.

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 the present case, the Panel notes that the Respondent must have been well aware of the Complainant and its SLIDESHARE trademark at the time of the registration of the disputed domain name. Namely, the first registration and use of SLIDESHARE trademark predate the registration of the disputed domain name by years, making it unlikely that the Respondent was not aware of the Complainant's trademark at the time of registration of the disputed domain name. Furthermore, the content of the website to which the disputed domain name resolves, leaves no room for doubt on the Respondent's knowledge of the Complainant and its SLIDESHARE trademark and evidences that the Respondent actually had the Complainant and its trademark in mind when registering the disputed domain name.

Due to the above, the Panel finds that the disputed domain name has been registered in bad faith.

As indicated above, the disputed domain name resolves to a website under the name "SlideShare Downloader" that offers an online service enabling users to, without registration or subscription, download presentations available on the Complainant's SlideShare platform and therefore circumvent the subscription for the Complainant's services. Such use of the disputed domain name, which is specifically directed at the Complainant's SLIDESHARE trademark and the SlideShare platform, further supports a finding of bad faith.

Panels have held that the use of a domain name for illegitimate activity (here, claimed circumvention of subscription for the Complainant's services that can be perceived as a type of fraud) constitutes bad faith. WIPO Overview 3.1, section 3.4.

The Panel further finds that the Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's SLIDESHARE trademark as to the source, sponsorship, affiliation, or endorsement of the website, within the meaning of paragraph 4(b)(iv) of the Policy.

In accordance with the above, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

Therefore, 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 <downslides.com> be transferred to the Complainant.

/Stefan Bojovic/
Stefan Bojovic
Sole Panelist
Date: September 17, 2026