

ADMINISTRATIVE PANEL DECISION

Scribd, Inc. v. Yurii Shemetylo

Case No. D2026-3442

1. The Parties

The Complainant is Scribd, Inc., United States of America (“United States”), represented by IPLA, LLP, United States.

The Respondent is Yurii Shemetylo, Ukraine.

2. The Domain Name and Registrar

The disputed domain name <scribsave.net> is registered with Porkbun LLC (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 (Porkbun LLC (Registrar)/Whois Privacy, Private by Design, 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 requesting 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 Response was filed with the Center on August 28, 2026. The Complainant submitted a supplemental filing to the Center on September 9, 2026. On September 12, 2026, the Center commenced the panel appointment process.

The Center appointed Knud Wallberg as the sole panelist in this matter on September 16, 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 has been operating since 2007. It offers online software and retail platforms for computer, electronic, and software-related goods, including subscriptions to digital content such as e-books, audiobooks, magazines, podcasts, and documents, through its official website at “www.scribd.com”. The Complainant asserts that it has served over 1,950,000 paying subscribers and currently receives more than 200,000,000 unique monthly visitors to its official website.

The Complainant holds several trademark registrations for the SCRIBD mark, including the following:

- United States Trademark Registration No. 3777227 for SCRIBD (word mark), registered on April 20, 2010, in classes 9, 35, 38, and 42; and
- United States Trademark Registration No. 5898302 for SCRIBD (word mark), registered on October 29, 2019, in classes 9, 35, and 42.

(Hereinafter collectively referred to as the “SCRIBD mark”).

The Complainant further owns the domain name <scribd.com> (registered on September 24, 2006), which resolves to its official website.

The disputed domain name was registered on January 25, 2026. It resolves to an English-language website that displays “ScribSave” in its header and purports to provide Internet users with the ability to download documents, books, and presentations from the Complainant’s platform for free without registration or login.

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 its trademark, because it incorporates a slight common misspelling of the SCRIBD mark by removing the letter “d” from the end, constituting a classic case of typosquatting. The addition of the descriptive term “save” does not impact the confusing similarity of the disputed domain name with the Complainant’s mark.

The Complainant further asserts that the Respondent has no rights or legitimate interests in the disputed domain name. The Complainant is not aware of any trademark rights, domain name rights, or other rights that Respondent has relating to the SCRIBD mark, nor has the Complainant ever authorized the Respondent to use its SCRIBD mark in connection with any goods or services. Furthermore, the disputed domain name is not being used for a bona fide offering of goods or services. Instead, it is used for a website that alleges it provides users with the ability to download copyrighted content from the Complainant’s platform without subscribing to the Complainant’s services by acting as a proxy and manipulating the URL link.

Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the SCRIBD mark. The SCRIBD mark has been extensively and continuously used since at least 2006 and is well known internationally. It is therefore implausible that the Respondent was unaware of the Complainant's prior rights when registering the disputed domain name just as the associated website provides its users a method to bypass the Complainant's paid service and download copyrighted materials for free by manipulating the target URL.

B. Respondent

The Respondent contends that the Complainant has not satisfied the second and third elements required under the Policy for a transfer of the disputed domain name.

As far as the second element is concerned the Respondent thus contends that the use of the disputed domain name for a website with its current content is legitimate referential use.

As far as the third element is concerned the Respondent contends that the Complainant has not proven that the disputed domain name was registered and used in bad faith. The Respondent argues that knowledge of the Complainant's SCRIBD mark is not the same as cybersquatting intent and the Complaint does not identify any evidence of a sale demand, extortion or market blocking, or of a pattern of conduct for abusive registrations. The Respondent further disputes that the Complainant has established that the service circumvents subscription restrictions or provides unauthorized access to copyrighted content, and relies on the website's statements concerning publicly available content and its disclaimer of affiliation.

6. Discussion and Findings

6.1. Procedural Issues

A. Location of the Respondent

Under paragraph 10 of the Rules, the Panel is required to ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case, and also that the administrative proceedings take place with due expedition.

The location of the Respondent disclosed by the Registrar appears to be in Ukraine, which is subject to an international conflict at the date of this Decision that may impact case notification. It is therefore appropriate for the Panel to consider, in accordance with its discretion under paragraph 10 of the Rules, whether the proceedings should continue.

Having considered all the circumstances of the case, the Panel is of the view that the proceedings should continue. The Panel notes that the Respondent has expressly acknowledged receipt of the Notification of Complaint and has submitted a substantive Response addressing the Complainant's contentions. The Respondent has therefore been able to participate in these proceedings and present its case. In these circumstances, the Panel is satisfied that proceeding to a decision is consistent with the requirements of paragraph 10 of the Rules.

B. Admissibility of Complainant's Supplemental Filing

Paragraph 10 of the UDRP Rules vests the panel with the authority to determine the admissibility, relevance, materiality and weight of the evidence, and also to conduct the proceedings with due expedition.

Paragraph 12 of the UDRP Rules expressly provides that it is for the panel to request, in its sole discretion, any further statements or documents from the parties it may deem necessary to decide the case.

Unsolicited supplemental filings are generally discouraged, unless specifically requested by the panel. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ([“WIPO Overview 3.1”](#)), section 4.6.

The Panel has reviewed the Complainant’s unsolicited Supplemental Filing of September 9, 2026. The record already reflects the Complainant’s Complaint and Amended Complaint. The Panel finds that the Supplemental Filing does not contain any new evidence or information necessary for the consideration of this matter but consists of challenges to the Respondent’s arguments. Accordingly, the Panel does not find it necessary to consider this Supplemental Filing nor refer it to the Respondent for comment.

6.2. Substantive Issues

According to paragraph 15(a) of the Rules, the Panel shall decide the Complaint in accordance with the Policy, the Rules and any rules and principles of law that it deems applicable and on the basis of the statements and documents submitted by the Parties.

In accordance with paragraph 4(a) of the Policy, the Complainant must prove that each of the three following elements is satisfied:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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 4(a) of the Policy states that the burden of proving that all these elements are present lies with the Complainant. At the same time, in accordance with paragraph 14(b) of the Rules, if a party, in the absence of exceptional circumstances, does not comply with any provision of, or requirement under, the Rules, or any request from the Panel, the Panel shall draw such inferences therefrom as it considers appropriate.

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.

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 Panel finds the mark is recognizable 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 here, “save”, 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. While the Respondent has advanced arguments seeking to establish a legitimate referential use of the disputed domain name, the Panel is not persuaded that such arguments confer rights or legitimate interests in the circumstances of this case.

The Panel thus finds that the Respondent’s website under the disputed domain name offers a “Scribd Downloader” service that invites Internet users to obtain Scribd-hosted content without registration or login and under circumstances likely to circumvent the Complainant’s ordinary access model.

Such use is not a bona fide offering of goods or services and does not confer rights or legitimate interests under the Policy.

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 given the circumstances of the case, in particular the extent of use and reputation of the Complainant’s trademark SCRIBD, the Respondent registered the disputed domain name with knowledge of the Complainant and the Complainant’s SCRIBD mark. The Respondent expressly acknowledged awareness of the Complainant. Further, the Panel finds that the Respondent could not have been unaware of the fact that the disputed domain name it chose could attract Internet users in a manner that is likely to create confusion for such users.

Panels have held that the use of a domain name for illegitimate activity may constitute bad faith under the Policy. In the present case, the disputed domain name is used for a website expressly branded as a “Scribd Downloader”, offering Internet users the ability to obtain Scribd-hosted content without registration or login and under circumstances likely to circumvent the Complainant’s ordinary access model. In the Panel’s view, such use seeks to capitalize on the association with the Complainant’s mark and Internet users’ interest in the Complainant’s platform, and constitutes bad faith use. [WIPO Overview 3.1](#), section 3.4.

The Panel also finds that the overall circumstances of this case point to the Respondent's bad faith, and the mere existence of a disclaimer cannot cure such bad faith. [WIPO Overview 3.1](#), section 3.7.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 <scribsave.net> be transferred to the Complainant.

/Knud Wallberg/

Knud Wallberg

Sole Panelist

Date: September 30, 2026