ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Sanofi v. FIROJ KHAN, Soliviya
Case No. D2026-4283

1. The Parties

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

The Respondent is FIROJ KHAN, Soliviya, India.

2. The Domain Name and Registrar

The disputed domain name <sanofiindialimited.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 23, 2026. On September 24, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 24, 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 (Domains By Proxy, LLC, Registration Private) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 25, 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 September 30, 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 October 1, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 21, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 22, 2026.

The Center appointed Peter Burgstaller as the sole panelist in this matter on October 27, 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 world leading multinational pharmaceutical company headquartered in Paris, France. (Annexes 5 - 7 to the Complaint).

It owns numerous trademark registrations in many jurisdictions around the world consisting of the mark SANOFI, inter alia

- French trademark registration for SANOFI (word), Reg No. 1482708, registered on August 11, 1988;
- European Union trademark registration for SANOFI (word), Reg No. 004182325, registered on February 9, 2006;
- International trademark registration for SANOFI (word), Reg No. 1092811, registered on August 11, 2011, designating many jurisdictions around the world (Annex 8 to the Complaint).

The Complainant further owns several domain name registrations containing the mark SANOFI, e.g. <sanofi.com> registered on October 13, 1995, <sanofi.eu> registered on March 12, 2006, or <sanofi.fr> registered on October 10, 2006 (Annex 9 to the Complaint); it uses the domain name <sanofi.com> to host its primary website.

The disputed domain name was registered on September 4, 2026 (Annex 1 to the Complaint); at the time of filing the Complaint the disputed domain name referred to a landing page with no material content but displaying a contact form (Annex 11).

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 it is the rightful owner of the trademark SANOFI, a highly distinctive, well-known and famous mark around the world; it notes that the disputed domain name contains this SANOFI trademark in its entirety and simply adds the descriptive terms "india" and "limited" as suffixes which cannot eliminate the confusing similarity between the Complainant's trademark and the disputed domain name. In fact, the Complainant alleges that the adjunction of these generic terms even increases the inherent risk of confusion.

Moreover, the Complainant's trademark registrations as well as domain name registrations which contain the SANOFI mark are prior to the registration of the disputed domain name.

The Complainant submits that especially because of the fame of the Complainant and its trademark SANOFI it is inconceivable that the Respondent would not have been aware of the Complainant's trademark when registering the disputed domain name, or that there would be any legitimate use for the disputed domain name. Further, the Complainant has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to use the SANOFI trademark in any manner.

Finally, the Complainant notes that the disputed domain name was registered in bad faith and resolves to an active landing page indicating that the website is active and displaying a contact form; however, even a passive holding falls within the concept of the domain name being used in bad faith.

B. Respondent

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

6. Discussion and Findings

According to paragraph 4(a) of the Policy, the Complainant must prove that:

(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 with respect to the disputed domain name; and
(iii) 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.

Based on the available record, the Panel finds the Complainant has shown rights in respect of the mark SANOFI for the purposes of the Policy. WIPO Overview 3.1, section 1.2.1.

The disputed domain name is confusingly similar to the mark SANOFI since it incorporates the entirety of the mark and only adds the terms "india" and "limited" to the SANOFI mark.

It has long been established under UDRP decisions that where the relevant trademark is recognizable within the disputed domain name, the mere addition of other terms (here: "india" and "limited") does not prevent a finding of confusing similarity under the first element of the Policy. This is the case at present, since SANOFI is clearly recognizable within the disputed domain name. WIPO Overview 3.1, section 1.7.

Finally, it has also long been held that generic Top-Level Domains ("gTLDs") (in this case ".com") are generally disregarded when evaluating the confusing similarity of a disputed domain name. WIPO Overview 3.1, section 1.11.1.

Based on the available record, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Although 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 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 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 Complainant focuses on the fact that its trademark is highly distinctive and famous and provides suitable evidence of its reputation, adding that it is inconceivable that the Respondent would not have been aware of this when registering the disputed domain name.

Moreover, the Complainant has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to use the SANOFI trademark in any manner. Further, the disputed domain name is not being used for a bona fide offering of goods or services.

The nature of the disputed domain name, comprising the Complainant's distinctive and famous mark together with the suffixes "india" and "limited" cannot be considered fair use as this, in the Panel's view, signals the Respondent's intention to confuse users seeking or expecting the Complainant and its trademark.

The Respondent did not reply to the Complainant's contentions and hence has not rebutted the Complainant's prima facie showing.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

As stated in paragraph 4(a)(iii) of the Policy, the Complainant must show registration and use of the disputed domain name in bad faith. These are cumulative requirements.

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 Complainant has rights and is the owner of the distinctive and globally well-known mark SANOFI, which is registered and used in many jurisdictions around the world decades before the registration of the disputed domain name. Moreover, the Complainant registered and is using numerous domain names containing the mark SANOFI, especially <sanofi.com> to host its company website.

It is inconceivable for this Panel that the Respondent registered the disputed domain name without knowledge of the Complainant's rights, which leads to the necessary inference of bad faith. This finding is supported by the fact that the disputed domain name incorporates the Complainant's distinctive trademark SANOFI in its entirety and adds the suffixes "india" and "limited" which even strengthen the impression that the Respondent must have been aware of the Complainant, its mark and company when registering the disputed domain name and tried to take unfair advantage of it by suggesting an approbation of or affiliation with the Complainant.

Finally, a simple online search for "sanofi" would have shown the Complainant and its marks. WIPO Overview 3.1, section 3.2.3.

Therefore, the Panel is convinced that the disputed domain name was registered in bad faith by the Respondent.

Although there is no evidence that the disputed domain name resolved to a website with substantive content, UDRP panels have found that under certain circumstances the non-use of a domain name (including a blank or "coming soon" or "parking" page) would not prevent a finding of bad faith under the doctrine of passive holding. WIPO Overview 3.1, section 3.3.

Having reviewed the available record, the Panel finds bad faith use on the basis of the evidence and documents put forward in the Complaint: The Complainant has a strong online presence worldwide, its trademark SANOFI is distinctive, famous and globally well-known and the Respondent did not submit a Response; these factors support the finding that the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Based on the available record, the Panel finds that 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 disputed domain name <sanofiindialimited.com> be cancelled.

/Peter Burgstaller/
Peter Burgstaller
Sole Panelist
Date: November 7, 2026