

ADMINISTRATIVE PANEL DECISION

TYPEFORM SL v. Ram Kumar

Case No. DAI2025-0029

1. The Parties

The Complainant is TYPEFORM SL, Spain, represented internally.

The Respondent is Ram Kumar, India.

2. The Domain Name and Registrar

The disputed domain name <typeform.ai> is registered with Spaceship, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 20, 2025. On June 20, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 23, 2025, 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 / Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 23, 2025, 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 June 23, 2025. The Respondent sent a first email communication to the Center on June 23, 2025. Following this email communication, the Center sent a possible settlement email to the parties on June 24, 2025. On June 25, 2025, the Complainant confirmed that they would like to continue the proceedings. The Response was filed with the Center on June 25, 2025.

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. On June 23 and 24, 2025 the Respondent sent two email communications, requesting a voluntary suspension of the proceeding to explore a possible settlement with the Complainant. On June 25, 2025, the Complainant responded that it did not wish to pursue said suspension and on the same day the Respondent sent an email communication in response to the Complaint.

The proceedings commenced on June 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 20, 2025. On July 1, 2025, the Center sent an email communication, requesting for the Respondent to confirm that the Response prior to the commencement of the proceedings was the final Response. On the same day, the Respondent confirmed that the Response filed previously was its complete and final Response, and the Complainant sent a Supplemental Filing to the Center.

The Center appointed Luca Barbero as the sole panelist in this matter on July 24, 2025. 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 company incorporated in 2012 specialized in the field of electronic forms for the collection and processing of data and in the inception, development, improvement and marketing of software as a service ("SaaS") solutions.

As one of the main actors in the European start-up / scale-up SaaS scene, over the past 13 years, the Complainant experienced continuous expansion and growth, securing several financing rounds to fund its business operations, the last of which was completed in 2022, resulting in the Complainant securing USD 135,000,000 from several investors located in both the European Union and the United States of America.

With over 300,000 active users per month, and about 4,000,000 new customers that sign up for its services annually, the Complainant's products include TYPEFORM, a self-serve tool to create highly customizable and user-friendly forms, quizzes and questionnaires; VideoAsk, a tool that offers a video-based platform to collect video and audio responses, as well as all the background infrastructure to process all data collected afterwards; Formless, an iteration of the TYPEFORM tool, based on OpenAI LLC's ChatGPT AI model; and Typeform for Growth, a complete suite of features, developed jointly with and on top of top-tier solutions, such as Anthropic, or ChatGPT, to improve its TYPEFORM product and ensure a state-of-the-art SaaS offering.

Between 2022 and 2024, the Complainant received considerable consumer, industry and media recognition obtaining awards such as:

- Best Overall Conversational Marketing Company from MarTech Breakthrough Awards,
- Gold Winner in the "Now You Know" MarCom Awards Brand Campaign and
- "Best Solution for SMBs" at the SaaS Stock Awards.

The Complainant is the owner of several trademark registrations for TYPEFORM, including the following, as per trademark registration details submitted in annex VII to the Complaint:

- International trademark registration No. 1486709 for TYPEFORM (word mark), registered on July 26, 2019, in classes 9, 35 and 42, designating amongst others India;
- European Union trademark registration No. 018036080 for TYPEFORM (word mark), filed on March 15, 2019, and registered on August 3, 2019, in classes 9, 35, and 42;
- United Kingdom trademark registration no. UK00918036080 for TYPEFORM (word mark), filed on March 15, 2019, and registered on August 3, 2019, in classes 9, 35, and 42.

The Complainant's products and services are promoted online via the website "www.typeform.com".

The Complainant provided evidence – which has not been challenged by the Respondent – showing that the disputed domain name was originally registered by the Complainant's co-founder on February 11, 2023, for two years.

According to the Registrar-provided information, which is reflected in the public Whois records, the disputed domain name was registered by the Respondent on May 23, 2025. At the time of filing the Complaint, the disputed domain name resolved to a Registrar parking page offering the disputed domain name for sale for USD 25,000. The disputed domain name is currently not resolving to an active website.

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 identical to the trademark TYPEFORM in which the Complainant has rights as it reproduces the trademark in its entirety with the mere addition of the country code Top-Level-Domain ("ccTLD") ".ai" for Anguilla.

The Complainant submits that the Respondent has no rights or legitimate interests in respect of the disputed domain name since: i) the Respondent has not been using the disputed domain name in connection with any bona fide offering of goods and/or services, as the disputed domain name was redirected by the Respondent to a landing page where it was put for sale and users were prompted to buy it or placing an offer; ii) the Respondent is not commonly known by the disputed domain name nor has he ever registered (or attempted to register) TYPEFORM or a name corresponding to the disputed domain name as a trademark; iii) the Complainant has never licensed or authorized in any manner the Respondent to use its TYPEFORM mark for any purposes; iv) the Respondent appears to have registered the disputed domain name to capitalize on the Complainant's reputation to obtain unfair profit from the Complainant's goodwill and renown and no legitimate non-commercial or fair use of the disputed domain name has taken place; and v) the disputed domain name, being identical to the Complainant's trademark, carries a high risk of implied affiliation with the Complainant.

With reference to the circumstances evidencing bad faith, the Complainant indicates that the Respondent acted in bad faith since: i) the Respondent registered the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring it for valuable consideration in excess of the Respondent's documented out-of-pocket costs directly related to the disputed domain name, as the Respondent is offering users the possibility to buy the disputed domain name for USD 25,000 or for a best offer; ii) the Respondent decided to register a domain name identical to the Complainant's registered trademark to capitalize on the Complainant's reputation because, since its incorporation 13 years ago, the Complainant has created a presence in the international market and, as a result of the success of its products, it has received international recognition, has been able to fund itself USD 135,000,000 during its last financing round in 2022, being partnering with state-of-the-art companies in creating innovative AI features.

The Complainant also states that the Respondent's bad faith is evidenced by the fact that the disclaimer used on the webpage to which the disputed domain name resolved (reading: "Conversational forms supercharged by artificial intelligence. Unlock the power of branding with a domain that speaks before you do. short, sharp, and impossible to ignore. This name isn't just digital real estate; it's your competitive edge waiting to be claimed. Secure it now before your competitor does or wish you had") referred directly to the Complainant, making reference to 'conversational forms' which were previously used as a quote by the Complainant since 2023. The Complainant claims that such circumstance proves that the registration of the disputed domain name did not happen by mistake, but the Respondent was fully aware of the prior rights of the Complainant, and of the Complainant's usage of the TYPEFORM mark, also considering that the disputed domain name was originally registered by the Complainant's co-founder.

The Complainant further submits that the Respondent did not intend to use a generic or descriptive term or dictionary word, but to reproduce the Complainant's trademark and illegitimately benefit out of a resale of the disputed domain name.

As a further circumstance evidencing bad faith, the Complainant states that it appears that the Respondent engaged in similar activities before, as he was involved in the prior case *Legrand France, Novateur Electrical & Digital Systems Private Limited v. Ram Kumar*, 32AAHFL0553A1Z1, WIPO Case No. [D2023-2210](#), where the Respondent was found to have registered another domain name in bad faith and without prior rights.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name for the following reasons:

The Respondent concurs with the Complainant's allegation regarding the fact that the disputed domain name is identical to the Complainant's trademark but contends that similarity alone is insufficient for transfer under the Policy, since the term "typeform" is composed of two generic English words ("type" and "form") which are descriptive and widely used in software, especially in form-building technologies.

With reference to rights or legitimate interests in respect of the disputed domain name, the Respondent contends that, contrary to the Complainant's allegations, he registered the disputed domain name on the basis of its descriptive value and for the purpose of building an AI-powered smart form generator, a project that, though paused temporarily "due to a personal loss", he had begun in May 2025 and would be still available on his website created on an internal page of "www.lovable.dev".

With reference to bad faith registration and use, the Respondent denies the Complainant's claims and submits that he was not acting in bad faith but that he genuinely chose to register the disputed domain name in good faith for use in connection with his SaaS project.

Furthermore, the Respondent contends that since: i) the disputed domain name does not point to a website using the Complainant's TYPEFORM logo; ii) the website does not include impersonation or misleading content; iii) there was no form of outreach to sell the disputed domain name to the Complainant; iv) any listing value was based on generic branding value and not trademark misuse; and v) the language used in the landing page description was composed by common marketing phrases (such as "Conversational forms" and "Unlock the power of branding") used across many domain and SaaS sites, the disputed domain name was registered and used in good faith.

C. Complainant's Supplemental Filings

In its supplemental filing of July 1, 2025, the Complainant claims that, after examination of the Respondent's Response, the Complainant has become aware of new facts that are crucial to prove the Respondent's bad faith and his lack of demonstrable preparations to use of the disputed domain name. Particularly, the Complainant contends that:

i) the Respondent's asserted project involving the disputed domain name was built through an easy-to-use and AI-powered service available at "www.lovable.dev" that enables the expedite creation of websites and other products and of which the Complainant could not be aware of before the start of the proceeding;

ii) the Respondent has under his account on "www.lovable.dev" also a web page dedicated to domain name sale and is part of a bigger organization called "Rapid Names" engaged in the sale and purchase of domain names;

iii) even though the Respondent claims to have created "a genuine good-faith SaaS project by an independent developer", and that the content of the website at the disputed domain name was a "generic placeholder while development was in progress", the Respondent did not actually use the disputed domain name in connection with such a project but was offering the disputed domain name for sale;

iv) the Respondent is using the combination of “typeform” and “.ai” in the disputed domain name as trademark, rather than as a generic name composed of the two words “type” and “form” to refer to a product, and was thus clearly aware of the Complainant and its trademark.

The Complainant concludes that the asserted project was created by the Respondent as an excuse in case UDRP proceedings were initiated, while the Respondent always intended to offer the disputed domain name for sale.

6. Discussion and Findings

6.1. Preliminary procedural issue: Complainant’s Supplemental Filing

Before entering into the merits of the case, the Panel addresses the issue of the unsolicited supplemental filing submitted by the Complainant.

No provision concerning supplemental filings are made in the Rules or Supplemental Rules, except at the request of the panel according to paragraph 12 of the Rules, which states the panel, in its sole discretion, may request any further statements or documents from the parties it may deem necessary to decide the case.

According to paragraph 10 of the Rules, the Panel has the authority to determine the admissibility, relevance, materiality and weight of the evidence, and also to conduct the proceedings with due expedition, ensuring that the Parties are treated with equality and that each Party is given a fair opportunity to present its case.

As stated in the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([“WIPO Overview 3.0”](#)), unsolicited supplemental filings are generally discouraged – unless specifically requested by the panel – and the party submitting an unsolicited supplemental filing should clearly show its relevance to the case and why it was unable to provide the information contained therein in its complaint or response.

Accordingly, UDRP panels generally accept supplemental filings only when they provide material new evidence or a fair opportunity to respond to arguments that could not reasonably have been anticipated. See, along these lines, *Welcomemat Services, Inc. v. Michael Plummer Jr., MLP Enterprises Inc.*, WIPO Case No. [D2017-0481](#).

The Complainant submitted its Supplemental Filing after receipt of the Response, in which the Respondent asserted to have registered the disputed domain name for use in connection with a project and provided a link to a third-party website where description of the project was available.

Since, at the time of the filing of the Complaint, the Complainant could not have been aware of the above-mentioned defense later raised by the Respondent, the Panel has decided to admit the Complainant’s Supplemental Filing (see section 5C above).

In addition, since said Supplemental Filing is limited in scope to comments on the Respondent’s asserted project and other contents published on the website referenced to by the Respondent in his Response, and the Respondent already had a fair opportunity to present its case submitting any documents to substantiate his allegations, bearing also in mind the need for procedural efficiency, the Panel does not deem appropriate to request the Respondent to submit additional comments with regard to the Complainants’ Supplemental Filing.

6.2. Substantive issues

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 directs 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 3.0](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. Indeed, the Complainant has provided evidence of ownership of valid trademark registrations for the word mark TYPEFORM in several jurisdictions.

The entirety of the mark is reproduced within the disputed domain name with the mere addition of the ccTLD “.ai”, which can be disregarded under the first element confusing similarity test. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), sections 1.7 and 1.11.1.

Therefore, 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 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 3.0](#), 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. Though the Respondent sought to rebut the Complainant’s prima facie showing, it has not come forward with sufficient evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

The Panel notes that there is no relation, disclosed to the Panel or otherwise apparent from the record, between the Respondent and the Complainant. The Respondent is not a licensee of the Complainant, nor has the Respondent otherwise obtained an authorization to use the Complainant’s trademark.

Furthermore, there is no indication before the Panel that the Respondent is commonly known by the disputed domain name, has made preparations to use the disputed domain name in connection with a bona fide offering of goods or services, or that he intends to make a legitimate noncommercial or fair use of the disputed domain name.

The Respondent asserted that he registered the disputed domain name since it encompasses two generic English words (“type” and “form”) which are descriptive and widely used in software, especially in form-building technologies. However, based on the record, the Panel finds that the Respondent has not provided sufficient credible evidence to demonstrate that he actually intended to use the disputed domain name in connection with his asserted project of building an AI-powered smart form generator and notes that, on balance of probabilities, the Respondent built the website he mentioned in the Response through an external service (available at “www.lovable.dev”) to build a defense in the ongoing proceeding.

As stated in section 2.10 of the [WIPO Overview 3.0](#), “Panels have recognized that merely registering a domain name comprised of a dictionary word or phrase does not by itself automatically confer rights or legitimate interests on the respondent; panels have held that mere arguments that a domain name corresponds to a dictionary term/phrase will not necessarily suffice [and above all, the domain name cannot] trade off third-party trademark rights”. Moreover, “Panels also tend to look at factors such as the status and fame of the relevant mark and whether the respondent has registered and legitimately used other domain names containing dictionary words or phrases in connection with the respective dictionary meaning.”

In the present case, the registration and use of a domain name identical to the Complainant’s prior trademark TYPEFORM, which has been used for several years in connection with the Complainant’s products and services and has become well-known in its sector especially in the recent years, suggests that the Respondent registered the disputed domain name to capitalize on the Complainant’s goodwill and reputation. Moreover, the disputed domain name has been offered for sale in a way that seems to target the Complainant.

Therefore, the Panel finds the second element of the Policy has also 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.

In the present case, the Panel notes that, in light of i) the Complainant’s prior registration and use of Complainant’s trademark TYPEFORM in connection with the Complainant’s products and services, including processing of data and inception, development, improvement and marketing of SaaS solutions also promoted online via the Complainant’s website at the domain name <typeform.com>; ii) the well-known character of the trademark in its sector, iii) the identity of the disputed domain name with the Complainant’s trademark; and iv) the circumstance that the Respondent claims to be active in the same field as the Complainant, the Respondent was likely aware of, and intended to target, the Complainant and its trademark when it registered the disputed domain name.

Based on the records, the Panel finds that, the Respondent likely registered the disputed domain name primarily for the purpose of selling, renting, or otherwise transferring the disputed domain name to the Complainant which is the owner of the trademark TYPEFORM, for valuable consideration in excess of your documented out-of-pocket costs directly related to the disputed domain name, according to paragraph 4(b)(i) of the Policy.

Lastly, the Panel notes that the disputed domain name currently resolves to an inactive website. Panels have found that the non-use of a domain name would not prevent a finding of bad faith under the doctrine of passive holding. [WIPO Overview 3.0](#), section 3.3. Having reviewed the available record, the Panel notes:

i) the distinctiveness and reputation of the Complainant's trademark in its sector, ii) the identity of the disputed domain name with such trademark and the registration in the ".ai" ccTLD referable to "Artificial Intelligence", a field in which the Complainant operates and is widely known, and iii) the Respondent's failure to provide evidence of actual good-faith use despite its claims, and finds that in the circumstances of this case the passive holding of the disputed domain name does not prevent a finding of bad faith under the Policy.

Therefore, the Panel finds that the Complainant has established the third element of the Policy as well.

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 <typeform.ai> be transferred to the Complainant.

/Luca Barbero/

Luca Barbero

Sole Panelist

Date: August 15, 2025