

Decision for dispute CAC-UDRP-105837

Case number	CAC-UDRP-105837
Time of filing	2023-10-30 09:59:13
Domain names	verauni.com, verduni.com, versni.com, versui.com, versunu.com, vrsuni.com, wwwversuni.com, versuin.com, VERSUNI.SITE, VERSUNI.XYZ, VERSUNI.ONLINE, VERSUNIA.COM

Case administrator

Name	Olga Dvořáková (Case admin)
------	------------------------------------

Complainant

Organization	Versuni Holding B.V.
--------------	-----------------------------

Organization	Uccello Limited
--------------	------------------------

Complainant representative

Organization	Coöperatie SNB-REACT U.A.
--------------	----------------------------------

Respondents

Name	Lei Shi
------	----------------

Name	Munish ARORA
------	---------------------

OTHER LEGAL PROCEEDINGS

The Panel is not aware of any other legal proceedings which are pending or decided and which relate to the disputed domain names.

IDENTIFICATION OF RIGHTS

Versuni Holding B.V. and Uccello Limited (henceforth collectively: "Complainant"), are the owners of the "Versuni" trademarks

- Benelux trademark registration n° 1463339 for Versuni filed on 22 april 2022 and registrered on 3 may 2022 claiming goods and services in classes 3, 7, 8, 9, 11, 21, 30, 35, 37, 41, 42
- UK trademark registration n° 00003832613 for Versuni filed 23 September 2022 claiming the prioriyt right of the above mentioned BX trademark applciation claiming goods and services in classes 3, 7, 8, 9, 11, 21, 30, 35, 37, 41, 42.

FACTUAL BACKGROUND

Versuni Holding B.V. and Uccello Limited (henceforth collectively: "Complainant"), are the owners of the "Versuni" trademarks, which

refer to the new corporate name of the well-known producer of consumer goods, Philips Domestic Appliances (<https://www.versuni.com/newsroom/philips-domestic-appliances-becomes-versuni>). Complainant, previously “Philips Domestic Appliances”, is headquartered in the Netherlands and active in the field of global innovation, manufacturing, and commercial footprint in more than 100 countries. Complainant’s portfolio spans kitchen appliances and other household products, climate care, garment, and floor care. The company has launched a wealth of successful household products that meet the changing needs of the consumer and deliver best-in-class innovation.

The Complainant underlines that it is the owner of the “Versuni” trademark since May 3, 2022, and that the nine disputed domain names have been registered several months later, on September 20, 2022.

Initially, two co-Complainants filed the Complaint against Lei SHI for some disputed domain names (namely <verauni.com> ; <verduni.com>; <versni.com>; <versui.com>; <versuin.com>; <versunu.com>; <vrsuni.com> and <wwwversuni.com>) and against Munish ARORA (disputed domain names <versunia.com>; <versuni.online>; <versuni.site>; <versuni.xyz>) for applying an identical pattern of conduct. The Registrars confirmed the domain name holders’ identification. The co-Complainants requested a consolidation of the complaint.

An issue arose concerning the language of the proceedings as some disputed domain names were governed by a registration agreement in Chinese language. The co-Complaints argued that despite the language of the agreement, English language should be the one of proceedings, having regard to all circumstances, and to help ensure fairness, and maintain an inexpensive and expeditious avenue for resolving domain disputes.

The co-Complainants observe that the disputed domain names incorporate the “Versuni” trademark in its entirety or consist of misspelling of their trademarks. The co-Complainants note that previous panels have held domain names to be confusingly similar if the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name.

The co-Complainants argue that it is implausible to believe that the Respondents did not have any actual knowledge of the co-Complainant’s trademark when it registered the disputed domain names.

The co-Complainants consider that the Respondents have attempted to cause confusion in internet users by registering several domain names which bear the Complainant’s trademark in its entirety or misspelled ones.

The co-Complainants add that the Respondents uses a privacy protection service on all the disputed domain names to hide its identity and considers that this may constitute evidence of bad faith.

The co-Complainants have requested that the proceedings concerning all disputed domain names are consolidated into single proceedings in accordance with paragraph 4(f) of the UDRP and paragraphs 3(c) and 10(e) of the UDRP Rules. The co-Complainants assert that all disputed domain names are owned or under the effective control of a single person or entity, or a group of individuals acting in concert. In support of this assertion, the co-Complainants contend the following:

- All of the disputed domains were registered on the exact same date – February 17th,
- All disputed domain names use a similar naming pattern, namely the entirety of Complainant’s “Versuni” trademark with different TLD or a textbook example of typosquatting by purposefully misspelling the complainant’s trademark with the key letters next to on a QWERTY keyboard layout
- All disputed domain names serve the same function, namely, to host a parked page that simply refers to PPC links and follow the exact same ‘template’.
- The disputed domain names are hosted on the two IP addresses: 185.53.177 and 3.33.130.190.
- The disputed domain names use DOMAINCONTROL.COM and PARKINGCREW.NET Nameservers. Complainant here refers to WIPO Case No. D2013-0994 (cheap- seikowatch.com etc.) which refers back to D2012-2212 and consolidated “138 domains [that] use only 22 different primary IP addresses and these are closely related into five groups” using the factors: (3) The disputed domain names resolve to the same or similar websites that feature similar content and serve the same function, namely to sell watch products; (4) The disputed domain name servers use the same or closely related domain name servers (i.e. the same hosting service).
- Prior Panels have also accepted consolidation in similar cases involving the same Respondent (e.g. Meta Platforms, Inc. v. Huade

Wang, shilei, and (Lei Shi) WIPO Case No. D2023-1344).

Section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“WIPO Overview 3.0”) provides as follows:

“Where a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. Procedural efficiency would also underpin panel consideration of such a consolidation scenario.”

The Panel concurs with past UDRP decisions that multiple domain names may be consolidated into a single case where they are all subject to common control and, having regard to all of the relevant circumstances, where consolidation would be procedurally efficient, fair and equitable to all parties, please see for example HUGO BOSS Trade Mark Management GmbH & Co v. Charles Carranza and William Tillery, Case No. 101901 (CAC, April 5, 2018) or PRADA S.A. v. xie xiaomei / zhang yuanyuan / zhou honghai / zhouhonghai / Zhou Hong Hai / Honghai Zhou / deng wen / xie peiyuan / Jianghong Wang / xie caida / liu min / du linmei, Case No. D2016-0799 (WIPO, June 22, 2016).

The Panel also concurs with the UDRP decision in CAC Case 101969 <UNDERARMOUROUTLETSTOREONSALE.COM> that although there may be no single factor which proves that all disputed domain names are under common ownership or control, it is sufficient when all relevant factors taken together lead to the reasonable conclusion that the disputed domain names are, in fact, commonly controlled and should be consolidated.

This is exactly the situation in the case at hand and therefore this Panel finds, on the balance of probabilities, that the disputed domain names are very likely under common ownership or control. Also, consolidation in this case is procedurally efficient, fair, and equitable to all parties and therefore is granted by the Panel.

Furthermore, the Panel having the possibility to conduct summary searches noticed that an identical pattern of conduct involving the Respondent Lei SHI came out in some UDRP matters (re. Benefit focus.com, Inc. v. Shilei, (Lei Shi), and Huade Wang Case No. D2022-4054 or Meta Platforms, Inc. v. Huade Wang, shilei, and (Lei Shi) Case No. D2023-1344).

The mere fact that Respondent Munish ARORA mentioned in a response to the Complaint that

“I have no association with the other respondent, Lei Shi. [...] The coincidence of buying a domain name around the same time is purely incidental”

may not be convincing insofar as (i) the typology of domain names is identical or just misspelling, and (ii) not only reserved on the same day but also within the same timeframe (minutes) could not be considered as “incidental”.

For the above reasons put forward by the co-Complainants, the Panel concludes that there are sufficient grounds to support the conclusion that the disputed domain names are subject to common control and that consolidation would be fair and equitable to all Parties. The Panel notes, in addition to the factors relied upon by the co-Complainant, each of the disputed domain names have been used in the same manner in respect of the parking pages.

Save where the context suggests otherwise, the Respondents will accordingly be referred to as the “Respondent” hereinafter.

The Panel decided that in light of the (same) Respondent’s use of the disputed domain name and Respondent’s decision to register domain names that misappropriates the [co-Complainants’] trademark, it would unduly burden the co-Complainants to have to arrange and pay for translation (re. In WIPO Decision D2023-1344 (Meta Platforms Inc. / Lei Shi). Furthermore, there is evidence showing that Respondent can understand the language of the complaint because some of the registration agreements in this dispute are in English language, and Mr. Munish ARORA replied in English. Also as mentioned in the Chinese registrar verification data, is using an e-mail address that exclusively consists of English words.

The Co-Complainants request the transfer of all disputed domain names.

PARTIES CONTENTIONS

The co-Complainants observe that the disputed domain names incorporate the “Versuni” trademark in its entirety or consist of misspelling of their trademarks. The co-Complainants note that previous panels have held domain names to be confusingly similar if the entirety of a trademark, or where at least a dominant feature of the relevant mark is recognizable in the domain name.

The co-Complainants furthermore emphasize that the applicable TLD is a standard requirement of registration and as such should be disregarded under the first UDRP element.

As regards the disputed domain names:

- <versuni.online>
- <versuni.site>
- <versuni.xyz>

It is a clear cut case of identical reproduction of the Trademarks.

- <wwwversuni.com>

It is a clear cut case of the so-called dot-squatting case where we are in a situation of omitting to type a full stop or point between 'www' and the <trademark>. See for example WIPO case D2004-1019 <wwwprada.com> [Prada S.A. v. Domains For Life], <wwwreuters.com> [Reuters Limited v Global Net 2000, Inc., WIPO Case No. D2000-0441], <wwwpfizer.com> [Pfizer, Inc. v. Seocho and Vladimir Snezko, WIPO Case No. D2001-1199],

- <verauni.com>
- <verduni.com>
- <versni.com>
- <versui.com>
- <versuin.com>
- <versunia.com>
- <versunu.com>
- <vrsuni.com>

The co-Complainants argued that the Respondents registered domain names that clearly consist of misspellings which are confusingly similar to the registered Trademarks. These are textbook examples of the practice known as "typosquatting", which e.g. relies on mistakes such as typos made by Internet users when inputting a website address into a web browser. According to section 1.9 of the WIPO Overview 3.0, a domain name that consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for the purpose of the first element. This stems from the fact that the domain name contains sufficiently recognizable aspects of the relevant trademark.

The co-Complainants note that, according to the available Whois information, all disputed domain names have been registered several months after the registration and use of the Complainant's trademark and on the same day.

The co-Complainants consider that the Respondent has no rights or legitimate interests to use the co-Complainant's trademark in a confusingly similar manner within the disputed domain names.

The co-Complainants state that it has no relationship whatsoever with the Respondents and has never licensed or otherwise authorized the Respondents to use the "Versuni" trademark in the disputed domain names.

The co-Complainants point out that it has exclusive trademark rights which predate the registration of the disputed domain names.

The co-Complainants submit that the Respondent cannot demonstrate any legitimate offering of goods or services under the "Versuni" trademark.

The co-Complainants consider that in the absence of a license or permission from the Complainant concerning the use of its trademark, no bona fide or legitimate use of the disputed domain names can reasonably be claimed.

The co-Complainants argue that no credible evidence that the Respondents is commonly known by the domain name is shown, nor the Respondents hold any trademark or service mark right on the "Versuni" trademark.

The co-Complainants note that a Respondent's use of a domain name will not be considered fair if it falsely suggests affiliation with the trademark owner.

The co-Complainants underline that all the disputed domain names resolve to a nearly identical kind of parked page where "pay per click" links are visible.

The co-Complainants argue that the Respondent's intention is that consumers who are looking for the Complainant's website will find one of the disputed domain names and the corresponding websites and subsequently generate revenue for the Respondent.

The co-Complainants consider that the fact of registering many variations containing the "Versuni" trademark in combination with other elements amounts to a 'pattern of conduct', supporting a finding of abusive registration.

The co-Complainants argue that it is implausible to believe that the Respondents did not have any actual knowledge of the co-Complainant's trademark when it registered the disputed domain names.

The co-Complainants consider that the Respondents have attempted to cause confusion in internet users by registering several domain names which bear the Complainant's trademark in its entirety or misspelled ones.

The co-Complainants add that the Respondent uses a privacy protection service on all the disputed domain names to hide its identity and considers that this may constitute evidence of bad faith.

RESPONDENT 1 - LEI SHI:

NO ADMINISTRATIVELY COMPLIANT RESPONSE HAS BEEN FILED

RESPONDENT 2- MUNISH ARORA:

(re strictly identical domain names <versuni.xyz>, <versuni.online>, <versuni.shop> and misspelled one <versunia.com>) indicates that it had no knowledge of Versuni or its connection to the previous Philips brand. Respondent's choice of the name was driven by the

interpretation of "Vers" in French, meaning "towards," and "uni" as the short form "universe," (Respondent states: "I have named it because I am living in France") representing a personal concept unrelated to Complainant's company. That Respondent's plan was to create a merchandise store and blog, focusing on T-shirt designs and has no association with the other respondent, Lei Shi. The Respondent 2 mentions that due to unforeseen financial difficulties, a suspension of the school email and contact number impeded its ability to access and manage his GoDaddy account for domain settings. Finally, the Respondent specifies he did not authorize GoDaddy to park the websites or display advertisements. In a second reply re-instating what has been developed in the first place, the Respondent 2 indicates a financial constraint with a shortfall of €9563 for school fees but by resolving this financial issue will unblock the account. Yet the Respondent 2 explained that it cannot commit to transferring the domain name at this time, and signing any document may pose difficulties for the Respondent.

RIGHTS

The co-Complainants have, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

The co-Complainants have, to the satisfaction of the Panel, shown the Respondents to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The co-Complainants have, to the satisfaction of the Panel, shown the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy).

PROCEDURAL FACTORS

The Panel is satisfied that all procedural requirements under UDRP were met and there is no other reason why it would be inappropriate to provide a decision.

The issues of Respondent's consolidation and language of the proceedings are summarised in the Factual background part of the decision.

PRINCIPAL REASONS FOR THE DECISION

In accordance with paragraph 4(a) of the Policy, in order to obtain the transfer of a domain name, the complainant has to demonstrate that:

- (i) The 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 domain name; and
- (iii) The domain name has been registered and is being used in bad faith.

IDENTICAL OR CONFUSINGLY SIMILAR

The first requirement that the Complainant must establish is that the disputed domain names are identical with, or confusingly similar to, the Complainant's trademark.

There are two elements of this test: for each domain name, the Complainant must demonstrate that it has rights in a trademark or service mark and, if so, the disputed domain names must be shown to be identical or confusingly similar to the trademark or service mark.

The co-Complainants have proven ownership of the registered trademark "VERSUNI", identified in section "Identification of rights" above i.e. Benelux trademark registration n° 1463339 in the name of VERSUNI HOLDING BV and UK trademark registration n° 00003832613 in the name of UCCELLO LIMITED.

The Panel observes that the registration of the Complainant's trademark predates the registration of the disputed domain names.

On the question of identity or confusing similarity, what is required is simply a comparison and assessment of the disputed domain names to the Complainant's trademark.

The disputed domain names differ from the Complainant's trademark "VERSUNI":

As regards the disputed domain names:

- <versuni.online>
- <versuni.site>
- <versuni.xyz>

The Trademark VERSUNI is identically and entirely reproduced in the disputed domain names. The Panel observes that it is well established that the top-level domain may generally be disregarded in the confusing similarity test (see, for example, WIPO case No. D2016-2547).

<wwwversuni.com>

The Trademark VERSUNI is identically and entirely reproduced in the disputed domain names, the adding of the common and generally accepted "www" for "world wide web" does not modify the perception of the reproduction. Furthermore, the combination "www" attached to a reproduce trademark is a common cybersquatting pattern so-called dot-squatting case, which means omitting to type a full stop or point between 'www' and the <trademark>. See for example WIPO case D2004-1019 <wwwprada.com> [Prada S.A. v. Domains For Life], <wwwreuters.com> [Reuters Limited v Global Net 2000, Inc., WIPO Case No. D2000-0441], <wwwpfizer.com> [Pfizer, Inc. v. Seocho and Vladimir Snezko, WIPO Case No. D2001-1199].

- <verauni.com>
- <verduni.com>
- <versni.com>
- <versui.com>
- <versuin.com>
- <versunia.com>
- <versunu.com>
- <vrsuni.com>

The Panel considers that this is pure and simple examples of the practice known as "typosquatting", which e.g. relies on mistakes such as typos or inversion of letters, omission of a letter, etc... made by Internet users when inputting a website address into a web browser.

The issue of confusing similarity is not dependent on decision regarding the element of bad faith registration (which in general means a knowledge of the domain name registrant about such confusing similarity). Generally, an omission or changing of one letter in a registered trademark does not preclude the confusing similarity. A domain name containing a misspelling of the Complainant's trademark is confusingly similar to this mark.

This finding is supported by the common pattern in registrations of these disputed domain names.

Therefore, the Panel considers that the disputed domain names are confusingly similar to the Complainant's trademarks.

Accordingly, the Panel finds that the Complainant has satisfied paragraph 4(a)(i) of the Policy.

RIGHTS OR LEGITIMATE INTERESTS

The second requirement that the complainant must prove is that the respondent has no rights or legitimate interests in each of the disputed domain names.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the respondent has rights or legitimate interests in a domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) [has] been commonly known by the [disputed] domain name, even if [the Respondent] [has] acquired no trademark or service mark rights; or
- (iii) [the Respondent] [is] making a legitimate non-commercial or fair use of the [disputed] domain name, without intent for commercial

gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

This is a non-exhaustive list of circumstances in which a respondent can show rights or legitimate interests in a domain name.

The onus of proving this requirement falls on the Complainant. UDRP panels have recognized that proving that a respondent lacks rights or legitimate interests in a domain name may result in the often impossible task of "proving a negative".

Accordingly, it is usually sufficient for a complainant to raise a prima facie case against the respondent and the burden of proof on this requirement shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in a domain name.

The Panel finds that the co-Complainants have made out a prima facie case that the Respondents do not have rights or legitimate interests in the disputed domain names.

In particular, the co-Complainants state that:

it has no relationship whatsoever with the Respondent and has never licensed or otherwise authorized the Respondent to use the "Versuni" trademark in the disputed domain names;

it has exclusive trademark rights which predate the registration of the disputed domain names;

the Respondent cannot demonstrate any legitimate offering of goods or services under the "Versuni" trademark;

in the absence of a license or permission from the Complainant concerning the use of its trademark, no bona fide or legitimate use of the disputed domain names can reasonably be claimed;

no credible evidence that the Respondent is commonly known by the domain name is shown;

the Respondents do not hold any trademark or service mark right on the "Versuni" trademark;

all the disputed domain names resolve to a nearly identical kind of parked page where "pay per click" links are visible.

In the absence of a Response of Respondent Lei SHI, there is no indication in the present case that the Respondent is commonly known by the disputed domain names.

Furthermore, the Respondent has failed to demonstrate any of the other non-exclusive circumstances evidencing rights or legitimate interests under paragraph 4(c) of the Policy or other evidence of rights or legitimate interests in the disputed domain names.

The Respondent does not appear to make any legitimate non-commercial or fair use of the disputed domain names, nor any use in connection with a bona fide offering of goods or services. Indeed, the disputed domain names redirect to webpages where "pay per click" links are visible.

Respondent Munish ARORA attempted a blurry explanation based on financial difficulties and no specific knowledge of the new branding of the co-Complainants. The Panel was not convinced on any of the arguments would overcome the evidence of absence of legitimate rights or interest nor absence of bad faith.

The Panel considers that, on the balance of probability, the Respondents knew the Complainant's trademarks and registered the disputed domain names with knowledge of the co-Complainant's rights. Indeed, it is not conceivable that the Respondents did not have the co-Complainant's trademarks in mind, when registering and using the disputed domain names. Under these circumstances, it cannot be concluded that the Respondents are making a "fair" use of the disputed domain names.

Taking into account that the Respondents is not commonly known as the disputed domain names, that the Respondent has no connection or business relationship with the Complainant, that the Complainant has not authorized the Respondent to use its trademark in the disputed domain names, that the disputed domain names are used by webpages where "pay per click" links are visible and not for any other legitimate purpose, the Panel cannot imagine any possible legitimate justification for this use, and the Respondent has not come forward with any explanation that demonstrates any rights or legitimate interests in the disputed domain names.

Accordingly, the Panel finds that the Complainant has satisfied paragraph 4(a)(ii) of the Policy.

REGISTERED AND USED IN BAD FAITH

Under the third requirement of the Policy, the Complainant must establish that the disputed domain names have been both registered and used in bad faith by the Respondent.

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, including:

(i) circumstances indicating that [the Respondent] [has] registered or [has] acquired the [disputed] domain name primarily for the purpose of selling, renting, or otherwise transferring the [disputed] domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of [the Respondent's] documented out-of-pocket costs directly related to the [disputed] domain name; or

(ii) [the Respondent] [has] registered the [disputed] domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that [the Respondent] [has] engaged in a pattern of such conduct; or

(iii) [the Respondent] [has] registered the [disputed] domain name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the [disputed] domain name, [the Respondent] [has] intentionally attempted to attract, for commercial gain, Internet users to [the Respondent's] web site or other on-line location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of [the Respondent's] web site or location or of a product or service on [the Respondent's] web site or location.

The Panel, on the basis of the evidence presented, agrees with the co-Complainant's contentions that the disputed domain names were registered in bad faith and that they have been used in bad faith.

Taking into account the fact that the trademark "VERSUNI" has been also used by the Respondents identically or mere misspelling, showing therefore, on a balance of probabilities, the Respondents knowledge of the new name which replaced the "PHILIPS" trademark (used under the name "Philips Domestic Appliances"), the Panel agrees that it is inconceivable that the Respondent was not aware of the co-Complainant's rights in the co-Complainant's trademarks when registering the disputed domain names.

Other panels considered that knowledge of a corresponding mark at the time of the domain name's registration can suggest bad faith (see WIPO Case No. D2017-0100). The Panel shares this view.

The Panel agrees also that the registration, in the exact same day, of the several disputed domain names which contain the same trademark is evidence of bad faith (see CAC Case No. 105266).

The Panel finds that the use of the disputed domain names in "pay per click" pages, in the circumstances of this case, are evidence of bad faith (see CAC Case No. 105138).

As regards the Respondents use of a privacy service when registering the disputed domain name, in line with other Panels' view, the Panel considers that, although the use of such service is not in and of itself an indication of bad faith, the circumstances and the manner in which such service is used may have an impact in the assessment of bad faith (see CAC Case No. 105097).

The Panel, having taken into account the Respondent's knowledge of the Complainant's trademarks at the time of the disputed domain names' registration, the use of the disputed domain names in "pay per click" pages, the registration of the disputed domain names in the same date, the lack of reply to the complaint, and the use of a privacy service, considers that the disputed domain names were registered and are being used in bad faith.

Additionally, the pattern of conduct of Respondent Lei Shi involved in over 10 UDRP cases previously would weight on a bad faith conduct.

Accordingly, the Panel finds that the disputed domain names were registered and are being used in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

AND THE DISPUTED DOMAIN NAME(S) IS (ARE) TO BE

1. **verauni.com**: Transferred
2. **verduni.com**: Transferred
3. **versni.com**: Transferred
4. **versui.com**: Transferred
5. **versunu.com**: Transferred
6. **vrsuni.com**: Transferred
7. **wwwversuni.com**: Transferred
8. **versuin.com**: Transferred
9. **VERSUNI.SITE**: Transferred
10. **VERSUNI.XYZ**: Transferred
11. **VERSUNI.ONLINE**: Transferred

12. **VERSUNIA.COM**: Transferred

PANELLISTS

Name **David-Irving Tayer**

DATE OF PANEL DECISION **2024-01-23**

Publish the Decision
