

Appeal – Quick Loans Ltd v CashEuroNetUK LLC

QuickQuid.uk – D00028377

1. Rights

- a. Expert applied an unusually high threshold to limb one. Evidence of trading was submitted, including website screenshots and the Complainant's FCA register entry. The Expert appears to have conflated the requirements for Rights with the distinct test under paragraph 5.1.6.
- b. Had the Expert been in doubt, Complainant's website was publicly accessible and could have been verified directly.

2. Abusive Registration

- a. The Expert States:

*“The **sole** argument advanced by the Complainant is that it sees no reason for the Respondent to hold the Domain Name when it has no genuine commercial or regulated use for the Domain Name.”*

- b. This characterisation materially understates the Appellant's pleaded case. While paragraph 5.1.6 was relied upon, the Complaint also pleaded the substantive elements of paragraphs 5.1.1.2 and 5.1.1.3 (albeit with incorrect numerical references to 5.1.2 and 5.1.3).
- c. The substance of those grounds was clearly advanced. The mis-citation was purely clerical and did not affect the content of the pleaded case.
- d. By describing the Complaint as advancing a “**sole** argument”, the Expert appears to have admitted he confined consideration to paragraph 5.1.6 only.
- e. Paragraphs 5.1.1.2 and 5.1.1.3 raise distinct bases upon which Abusive Registration may be found. Complainant was entitled to have each pleaded ground considered on its merits.

3. Expert's False Assumptions

- a. Expert formulated defences on behalf of the absent Respondent. Complainant does not object to this in principle, provided assumptions are factually accurate and Complainant is afforded an opportunity to respond – as the process would require had a Response been filed. Neither condition was met. Specific errors are set out below.
- b. Expert assumed the Complainant knew the Respondent's identity. At the time of filing, the public WHOIS was blank. Nominet's correspondence was initially blank, later identified GoDaddy Privacy as the Respondent before later switching to CashEuroNetUK LLC. The Complainant could not have known the Respondent's identity in advance.
- c. Expert appears to treat 2014 registration date as determinative of abuse, as though applying UDRP principles. Under the DRS Policy, abusive registration may arise at any point – not only at the date of original registration.
- d. Even on Expert's own approach, CashEuroNetUK LLC was registered (18/11/14) at Companies House, one month after quickquid.uk was first registered (15/10/14). Expert's assumptions are unsafe.
- e. RDAP data showed registrant details as validated in 2024, which could not have been accurate for a dissolved entity. Any inaccuracy in registrant information was attributable to the Nominet/GoDaddy, not Complainant. Complaint was brought in good faith on the basis of the information available.
- f. CashEuroNetUK LLC cannot be the true Respondent – it has been dissolved. Expert repeatedly mentions administration:

“Complainant is not entitled to the Domain Name simply because the Respondent entered into administration.”

which is factually incorrect. Dissolution and administration are materially different in law. This is verifiable from public Companies House records and the error is the Expert's alone. Expert has duty to check his own assumptions before relying upon them.

- g. As a dissolved company, Domain Name would have vested in the Crown under the doctrine of bona vacantia. The decision in DRS01409 (tigerbeer.co.uk) is directly relevant, where it was held that if the Crown acquired a domain name such that it could be sold to the highest bidder, this would be unfairly detrimental to a complainant's rights.
- h. Complainant had been in correspondence with Bona Vacantia prior to filing. In an email dated 16 July 2025, Bona Vacantia confirmed that CashEuroNetUK LLC '*appears to have been voluntarily cancelled,*' consistent with the Companies House and Delaware dissolution records submitted to them.
- i. Complainant did not plead the bona vacantia point specifically because the Respondent's identity was unknown. RDAP records show Domain Name last transferred (Registrar/Registrant?) two days before company entered administration in 2019. Transferee could equally have been a former director, trademark agent, or web designer.
- j. Complainant pleaded case on the basis of the information available. In the absence of a satisfactory response to paragraph 5.1.6, the Complaint invited consideration under paragraphs 5.1.1.2 and 5.1.1.3. Had a Response been filed providing a legitimate explanation, Complainant may have withdrawn Complaint at that stage.

4. Expert's Conduct

- a. Complainant is aware that DRS 25766 is a well-known Nominet dispute, used at Nominet expert events. Inevitable that opinions will have formed about DRS25512 alongside it. Complainant believes Expert has allowed those opinions to cloud his judgment, particularly in relation to the narrative adopted in this Decision.
- b. Expert's use of the terms 'misleading' and 'must have known' is highly defamatory, implying that the Complainant has deliberately misled Experts on evidence or pleadings – while simultaneously making factual errors of his own and affording the Complainant no opportunity to respond.
- c. Complainant therefore invites the Appeal Panel to identify anything in this Complaint, DRS25512, DRS25766 that it considers misleading,

and afford the Complainant the opportunity to respond. In the alternative, the Complainant asks the Panel to confirm that it finds nothing misleading in the evidence or pleadings.

- d. Complainant accepts that the Complaint was incomplete – evidence of goodwill was inadvertently omitted, paragraph 5.1.6 was misread, with the commas interpreted as disjunctive rather than conjunctive. Complainant is not legally represented and this was an honest error. It would not be appropriate to introduce that evidence at this stage, but an incomplete complaint is not dishonesty. In any case, 5.1.1.2 and 5.1.1.3 should still have been evaluated by the Expert.
- e. This dispute (QuickQuid.co.uk v QuickQuid.uk) is factually distinct from DRS 25512 (QuickLoans.co.uk v QuickQuid.co.uk). The Complainant had evidence of confusion in the earlier case but not in this one, which is precisely why the pleadings and evidence differ.
- f. Expert's use of the phrase 'supernatural ability' is sarcastic in tone and falls below standard expected of Nominet Experts.

5. Nominet

- a. If Complaint was directed to an incorrect registrant due to inaccurate registrar data, that is not attributable to the Complainant and provides no basis for adverse findings against it. The Complainant invites the Panel to determine how this matter should be resolved.

I confirm that the information contained in this document and any accompanying evidence is true and accurate to the best of my knowledge and belief. The appeal is 1000 words exactly without the statement of truth and the header. I further confirm that this submission has been made in good faith and that all facts presented herein are a true and complete account of the matters in dispute.

Graeme Wingate
Quick Loans Ltd
Complainant