Decision for dispute CAC-UDRP-108500

Case number	CAC-UDRP-108500
Time of filing	2026-03-23 09:41:25
Domain names	hailuo-02.com

Case administrator

Organization	Iveta Špiclová (Czech Arbitration Court) (Case admin)

Complainant

Organization	Shanghai Xiyu Jizhi Technology Co., Ltd.
Organization	Nanonoble PTE. LTD.

Complainant representative

Organization	Chofn Intellectual Property

Respondent

Organization	weidian

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 name.

IDENTIFICATION OF RIGHTS

Complainant, Nanonoble PTE Ltd, is the owner, among others, of the following registrations for the trademarks:

- United Kingdom registration number UK00004116722 for the trademark HAILUO in classes 9,35,38,41,42,45, registered on 17 January 2025;
- EUIPO registration number 019097061 for the trademark HAILUO in classes 9,35,38,41,42,45, registered on 22 March 2025;
- New Zealand registration number 1277272 for the trademark HAILUO in class 35, registered on 1 May 2025;
- Australia registration number 2494437 for the trademark HAILUO in class 9, registered on 10 June 2025;
- Singapore registration numbers 40202425120X and 40202425123U for the trademark HAILUO in classes 42 and 45, registered on 1 May 2025;
- WIPO registration number 1 846 303 for the trademark HAILUO in classes 9, 35, 38, 41, 42 and 45, registered on 22 January 2025 designating several countries.

In this Complaint, evidence of the above-mentioned registrations are submitted by providing copies of the certificates of registrations in the respective trademark registers.

Further acquired unregistered or common law rights are claimed but the Panel finds it not clear who is holding those rights. In the Complaint one writes about ‘Complainant’ but in fact there are two Complainants. Moreover, where it is asserted that evidence is

submitted, this evidence shows use of HAILUO AI products created by Minimax or, in a few occasions, startup Hailuo AI, and not Complainants in this Complaint. The Panel will thus disregard the claim of unregistered or common law rights as being a claim that is insufficiently substantiated.

FACTUAL BACKGROUND

Complainants are Shanghai Xiyu Jizhi Technology Co., Ltd., with domicile in Shanghai, China and Nanonoble PTE. LTD. with domicile in Singapore.

Shanghai Xiyu Jizhi Technology Co., Ltd. ("Complainant 1") was established in 2021 and is a leading artificial intelligence technology company engaged in the development of general AI technologies and related applications. Its registered capital and paid-in capital are both USD 20 million.

Nanonoble PTE. LTD. ("Complainant 2") was established in 2024 and is primarily responsible for the operation and international commercialization of the HAILUO AI and MINIMAX brands outside China.

Both companies are affiliated entities within the same business group and jointly participate in the development, promotion, and international operation of the HAILUO AI product and related brands.

In the Complaint no further mentioning of Complainant 1 and 2 is made but solely reference is made to Complainant. Where is written Complainant the Panel will refer to Complainants in this decision.

It is alleged in the Complaint that HAILUO AI was independently developed by Complainants and officially launched in China in April 2024. The product is based on Complainants' proprietary trillion-parameter MoE model abab-6.5 and offers multimodal artificial intelligence capabilities, including text analysis, content generation, AI music creation, and AI video generation.

Further it is alleged that since early May 2024, HAILUO AI has been widely reported by Chinese media. In August 2024, Complainants released its first AI high-definition video generation model, which became available for free use on the official HAILUO AI website. Prior to the registration of the disputed domain name, HAILUO AI test videos had also already been published on YouTube and attracted substantial online attention. Evidence of these early media and online references is provided.

However, as said by the Panel, all evidence shows a connection between HAILUO and, in most cases, the company Minimax. No link is established with Complainants in this Complaint.

Respondent registered the domain name <hailuo-02.com> on 19 June 2025.

Respondent is Andy Wang of Weidian with domicile in Hangzhou, China. Respondent did not file any Response in the Complaint.

PARTIES CONTENTIONS

Complainants contend that the requirements of the Policy have been met and that the disputed domain name should be transferred to it.
No administratively compliant Response has been filed.

RIGHTS

According to the Policy paragraph 4(a)(i) it needs first to be established that:

(i)The domain name is identical or confusingly similar to a trademark or service mark in which the complainant has rights;

As mentioned above, where the Complaint mentions Complainant, the Panel will read it as Complainants, being Shanghai Xiyu Jizhi Technology Co., Ltd. and Nanonoble PTE. LTD. together.

Complainants allege that in the comparison between the registered trademarks HAILUO and the disputed domain name < hailuo-02.com> the addition of the numerals "02" to the trademark does not prevent a finding of confusing similarity. On the contrary, it exacerbates the likelihood of confusion because "02" specifically corresponds to the versioning of Complainants' proprietary video generation model, which was released on the same day the disputed domain name was registered. Rather than distinguishing the domain, the suffix "02" acts as a further identifier of Complainants specific product iteration (Product Versioning), leading Internet users to believe the domain is an official platform for that version.

Furthermore, while the term "HAILUO" is the Romanized transliteration (Pinyin) of Complainants' core Chinese brand "" (Hǎi Luó), it has become the fixed and exclusive English-language identifier for Complainants' AI products globally. In the context of a string-for-

string comparison, Complainants' mark remains the dominant and clearly recognizable element within the disputed domain name.

Lastly, the addition of a Top-Level Domain (TLD) suffix (e.g., ".com") is a functional requirement and is generally disregarded for the purpose of assessing confusing similarity.

Accordingly, Complainants submit that the disputed domain name is confusingly similar to its HAILUO trademark.

The Panel follows the reasoning of Complainants. In the disputed domain name, the dominant element is HAILUO which is equal to the Complainants' trademark. The addition of 02 will be perceived as a second edition of the trademarked product and is thus no more than a descriptor of the trademarked product.

Further, the trademark registrations predate the registration of the disputed domain name and thus the trademark rights prevail.

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 Complainants have rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

According to the Policy paragraph 4(a)(ii) it needs further to be established that:

(ii) Respondent has no rights or legitimate interests in respect of the domain name.

Paragraph 4 (c) of the Policy provides circumstances that could demonstrate that Respondent has no rights to and legitimate interests in the Domain Name. These circumstances are not exclusive. Circumstance that are providing rights or legitimate interests to the domain name are:

(i) before any notice to the Respondent of the dispute, the use of, or demonstrable preparations to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services; or

(ii) Respondent (as an individual, business, or other organization) has been commonly known by the domain name, even if though it has acquired no trademark or service mark rights; or

(iii) Respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

Further, according to the WIPO Case No. D2003-0455, Croatia Airlines d. d. v. Modern Empire Internet Ltd., Complainants are required to make out a prima facie case that Respondent lacks rights or legitimate interests. Once such prima facie case is made, Respondent carries the burden of demonstrating rights or legitimate interests in the domain name. If Respondent fails to do so, Complainant is deemed to have satisfied paragraph 4(a) (ii) of the Policy.

According to Complainants Respondent has no rights in the disputed domain name:

- Complainants have never licensed, authorized, or otherwise permitted Respondent to use the HAILUO or HAILUO AI marks, or any domain name corresponding to those marks. Respondent is not, and has never been, an authorized dealer, distributor, reseller, or partner of Complainants.

- The disputed domain name currently resolves to a website that closely resembles Complainants own site and presents content suggesting sponsorship or endorsement by Complainants. According to Complainants, such use, given the lack of authorization or affiliation, cannot be considered a bona fide offering of goods or services or a legitimate noncommercial/fair use under the Policy. WIPO panels assess fair use by looking, among other things, at whether the website is genuinely non-misleading, whether it is clearly not operated by the trademark owner, and whether the overall use is truthful and well-founded.

- Respondent has also not been commonly known by the disputed domain name. The Registrar's disclosed registrant information does not show any corresponding business name, and Complainants' searches of relevant trademark databases did not reveal any trademark rights held by Respondent in connection with the HAILUO mark. Mere assertions that a respondent is commonly known by a domain name are insufficient; concrete and credible evidence is required.

- Respondent's use of the disputed domain appears to capitalize on Complainants mark and product naming rather than any independent right or legitimate interest. The addition of "02" does not give Respondent any separate entitlement, particularly where the disputed domain name tracks Complainants' own product naming and is used in a manner that suggests an association with Complainants.

Accordingly, Complainants submit that Respondent has no rights or legitimate interests in respect of the disputed domain name.

The Panel has the following findings.

The allegation that the disputed domain name currently resolves to a website that closely resembles Complainants own site and presents content suggesting sponsorship or endorsement by Complainants cannot be verified by the Panel as no clear evidence of this is submitted. For example: a print out of Complainants' website is not included.

However, the allegations of Complainants that they have never licensed, authorized, or otherwise permitted Respondent to use the HAILUO or HAILUO AI marks can be considered as true now that Respondent has not responded the contrary.

Also, the allegation of Complainants that Respondent has not been commonly known by the disputed domain name is sufficiently proven according to the Panel by the whois of Respondent, that shows a dissimilar name of a company and individual.

Lastly, Complainants allegation that Respondent's use of the disputed domain name appears to capitalize on Complainants' mark is also sufficiently substantiated through the explanation of the choice of the specific domain name that is confusingly similar to Complainants' trademark.

Complainants have, to the satisfaction of the Panel, shown Respondent 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

According to the Policy paragraph 4(a)(iii) it finally needs to be established that:

(iii) the domain name has been registered and is being used in bad faith.

Paragraph 4 (b) of the Policy provides circumstances on that demonstrate that Respondent has registered and used the domain name in bad faith. These circumstances are not exclusive. Those circumstance are for example:

(i) circumstances indicating that Respondent has registered or has acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the 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 your documented out-of-pocket costs directly related to the domain name; or

(ii) Respondent has registered the 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 Respondent has engaged in a pattern of such conduct; or

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

(iv) by using the domain name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to it'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 your web site or location or of a product or service on your web site or location.

Complainants assert that the compelling evidence of Respondent's bad faith is the undeniable and perfectly synchronized timeline surrounding the domain name registration. On June 18, 2025, Complainants officially released its highly anticipated video generation model, specifically named "HAILUO 02." On that exact same date, Respondent registered the disputed domain name <hailuo-02.com>. This perfect temporal coincidence definitively precludes any possibility of chance or independent creation. According to Complainants, it is a textbook example of targeted, opportunistic cybersquatting. Respondent clearly had actual, prior knowledge of Complainants' HAILUO brand and its specific new product launch, and acted immediately to hijack the exact alphanumeric designation of that product before the Complainant could secure it.

Further, Complainants assert that prior to this targeted registration, Complainants' HAILUO AI and HAILUO marks had already achieved substantial global media coverage and established a massive user base. Given the inherently distinctive nature of the HAILUO mark in the artificial intelligence sector and the worldwide attention surrounding Complainants technological advancements, Respondent's exact incorporation of the "HAILUO" mark coupled with the specific version number demonstrates undeniable bad faith at the time of registration.

Furthermore, Complainants claim that Respondent's current use of the disputed domain name unequivocally establishes bad faith under paragraph 4(b)(iv) of the Policy because the disputed domain name resolves to a website that meticulously clones Complainants' official site, prominently featuring Complainants registered HAILUO logos, proprietary product videos, and official imagery. This counterfeit website is heavily populated with advertising pages. By deliberately impersonating Complainants, Respondent is intentionally attempting to attract, for commercial gain, Internet users to its website by creating a severe likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of that website.

The combination of a hyper-targeted registration precisely matching a major product release date, followed by the operation of a fraudulent mirror website designed to monetize Complainants' natural web traffic, constitutes the highest degree of bad faith. Accordingly, Complainants submit that the disputed domain name was registered and is being used in bad faith.

The Panel has the following findings.

Complainants claim that Respondent has intentionally attempted to attract, for commercial gain, Internet users to its web site or other on-line location, by creating a likelihood of confusion with Complainant's mark (see also paragraph 4(b)(iv) of the Policy). In order to do so Respondent must have known of the use and reputation of Complainants' trademark.

Consequently, Complainants need to establish that Respondents knows or should have known about Complainants' use of the trademark HAILUO.

All evidence of use of the HAILO trademark as submitted by Complainants shows use of HAILO by either Minimax or, in some examples, startup Hailo AI. In none of the submitted evidence a link is made to one and/or two of the Complainants in this Complaint.

The Panel noted that Complainants mention to have trademark rights in MINIMAX. However, no evidence is submitted of the registration of the Minimax trademark. Moreover, the submitted media articles describe the products under the trademark HAILUO as developed by the company Minimax. The use of Mediamax in the media is tradename use, which is no trademark use. The Panel can therefore not establish a link between Minimax, user of the trademark HAILUO, and Complainants.

The Panel finds that it is the responsibility of Complainants to make it prima facie clear that the evidence submitted is related to Complainants and how it is related to Complainants. This is not done in this Complaint.

Though based on the Policy it has been accepted that a panel may undertake limited factual research into matters if it would consider such information useful to assessing the case merits and reaching a decision. In this respect the Panel decided to scrutinize the enclosed evidence material in order to attempt to link Minimax to Complainants. In this respect the Panel discovered the founder and CEO of Minimax, who is Mr Yan Junjie, and checked if he could be connected to Complainants. This could be done, e.g. via checking if he had signed the submitted Powers of Attorney. Mr Junjie however, did not sign the Power of Attorneys of Complainants as submitted in the Complaint. Thus, also here no relationship between Minimax and Complainants could be established here.

The Panel concludes that no link is made between Minimax (and startup Hailo AI) and Complainants in the submitted evidence. Further, the Panel concludes it has done more research than strictly necessary in a UDRP procedure, which in essence is a quick and straight forward procedure.

The Panel can therefore not consider the evidence of use of HAILO as relevant in this case. Moreover, asserted reputation cannot be established in connection with Complainants and the last is important as reputation is a factor in establishing bad faith at Respondent's end.

Further the assertion of Complainants that the timing of the registration of the disputed domain name is synchronized with the release of the video generation model, specifically named "HAILUO 02" is not substantiated with any evidence. Also this assertion will be disregarded by the Panel.

Lastly, the assertion that the Respondent's website mirrors the website of Complainants cannot be established by the Panel as the website of Complainants is not enclosed in the submitted evidence material.

The Panel concludes that the Complaint lacks vital information with respect to Complainants' own use and reputation of the claimed trademark right for HAILUO in order to establish bad faith use and registration at Respondent's end.

As the elements, confusing similarity of the trademark, lack of rights or legitimate interest and bad faith use and registration are cumulative for a successful claim, and the last element, bad faith use and registration cannot be established effecting Complainants, the claim must be rejected.

PROCEDURAL FACTORS

The Panel finds that there is no reason why it would be inappropriate to provide a decision.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Rejected

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

1. **hailuo-02.com**: Remaining with the Respondent

PANELLISTS

Name	**Marieke Westgeest**

DATE OF PANEL DECISION 2026-04-22

Publish the Decision