Decision for dispute CAC-UDRP-108517

Case number	CAC-UDRP-108517
Time of filing	2026-05-12 09:20:34
Domain names	maxclaw.ai

Case administrator

Name	Olga Dvořáková (Case admin)

Complainant

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

Complainant representative

Organization	Chofn Intellectual Property

Respondent

Name	andy wang

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 (the "Domain Name").

IDENTIFICATION OF RIGHTS

The Complainants contend that they are the owners of unregistered trade mark rights in the term “MaxClaw”.

FACTUAL BACKGROUND

The Complaint is brought by two Complainants in the same corporate group. The first is Shanghai Xiyu Jizhi Technology Co., Ltd (“Shanghai”), a limited liability company established in the People’s Republic of China. The second is Nanonoble PTE. LTD (“Nanonoble”), a company incorporated in Singapore. Both of the Complainants are wholly owned subsidiaries of MiniMax Group Inc, a company incorporated in the Cayman Islands, which was listed on the Hong Kong Stock Exchange in January 2026.

The group as a whole develops proprietary artificial intelligence models and systems, and uses the MINIMAX brand in respect of its activities. As at the end of December 2025 the group had more than 236 million users across over 200 countries and regions, with more than 214,000 enterprise customers and developers. Exactly what each of the Complainants does is unclear, but it appears that

Shanghai produces various AI products and Nanonoble markets and provides services in relation to those products.

At 11:05 am (Beijing Time) on 25 February 2026, the Complainants' group announced on X a product under the name "MaxClaw", which it described as "a cloud-hosted intelligent Agent powered by MiniMax". A further announcement was made at 7:00 am (Beijing Time) on 26 February 2026 in both English and Chinese on WeChat.

The Domain Name was registered at 12:13 pm (Beijing Time) on 26 February 2026 by an individual who gave the name Andy Wang and who purported to give an address in California, but using an address associated with a commercial development in Hangzhou, China, and provided a Chinese telephone contact number.

The Complainants' announcements benefited from significant media and social media coverage, with the announcement on X receiving 22,520 impressions by the end of the day, and there being an extensive uptick in worldwide Google searches for that term in the course of late February 2026 and throughout March 2026, particularly from persons who had also previously searched for the term "minimax".

On 27 February 2026, Nanonoble made an application with serial number 99675316 for a trade mark in the United States for MAXCLAW as a standard character mark in classes 9 and 42.

On 5 March 2026, Yuanyi Feng, who provided an address in Hangzhou, China, filed a United Stated trade mark application serial number 99685897 at the United States Patent and Trademark Office for MAXCLAW as a standard character mark in class 42.

Since at least 8 May 2026, the Domain Name has been used for (or to direct internet users to) a webpage that provides details about the MaxClaw product, and which looks as if it is the official website of the Complainants' group. In this respect, not only is there no disclosure of who is behind the website, but the website reproduces graphics used by the Complainants' group and includes a copyright notice that reads "© 2026 MaxClaw. A product of MiniMax". This website continues to operate as at the date of this decision.

PARTIES CONTENTIONS

The Complainants contend that the requirements of the Policy have been met and that the Domain Name should be transferred to them. So far as relevant trade mark rights are concerned, the Complainants contend that, due rapid public interest in and recognition following the launch of their product under the "MAXCLAW" name, this term began functioning as a source identifier in respect of their products prior to the Respondent's registration of the Domain Name.

The Complainants rely in this respect on the WIPO Overview 3.0, Section 1.3, as authority for the proposition that showing that a term has become a distinctive identifier is sufficient to generate common law rights for the purposes of the Policy. They further contend that MAXCLAW is not a generic or descriptive term, comprising instead "references to its existing MINIMAX brand and its AI product ecosystem (including 'OpenClaw'/related product naming conventions)".

So far as rights and legitimate interests and bad faith registration and use are concerned, they rely upon the timing of the registration of the Domain Name, and the website displayed from the Domain Name.

The Respondent did not file an administratively compliant response. Instead, it just sent an email providing a copy of the application for a trade mark for MAXCLAW by Yuanyi Feng at the United States Patent and Trademark Office.

The Complainants filed an unsolicited additional submission in response to the Respondent's email. It is not necessary to refer to the content of the additional submission, save to record that it points out what it describes as the "discrepancy" between the registrant details provided for the Domain Name and the details of the applicant for that trade mark.

RIGHTS

At times, the Complaint appears to assume that it is necessary to show relevant rights in the term MAXCLAW at the time that the Domain Name was registered. This is not quite right. The fact that rights do or do not exist at the time that a domain name is registered is potentially relevant to the issue of bad faith, since if rights did not exist at the time of registration, the complainant may have difficulty demonstrating that a domain name was registered in order to unfairly target the complainant and its future marks. But so far as the first element of the UDRP is concerned, what a complainant must show is rights at the time that a complaint is filed (see section 1.1.3 of the WIPO Overview 3.1).

In the present case the Complaint was filed on 9 May 2026, and accordingly this is the date of assessment.

The Complainants assert that they hold unregistered "common law" trade mark rights in the term MAXCLAW. As the Complainants correctly assert, section 1.3 of the WIPO Overview 3.1 (the Complainants refer to the WIPO Overview 3.0, which has recently been replaced by the WIPO Overview 3.1, but which is not materially changed in this respect) states that a complainant must show that the term in which rights are claimed has become a distinctive identifier of the complainant's goods and/or services. And in this respect, the Panel also accepts that the relevant term here is not obviously descriptive and accordingly that such an association is likely to be easier to show.

The Complainants have provided evidence that the term MAXCLAW rapidly became extensively associated with the Complainants' products within a matter of hours of launch. Also, by the time these proceedings were commenced on 9 May 2026, the Complainants had used that name in respect of their product for at least a further two months.

Further, the webpage displayed from the Domain Name just prior to the commencement of these proceedings suggested that the Respondent was deliberately targeting the Complainants' association with the MAXCLAW name. Therefore, this is a case where the Respondent's own actions suggest that MAXCLAW is a term that had become a distinctive identifier of the Complainants' products.

That still leaves the question as to exactly where the term has become distinctive. Section 1.3 of the WIPO Overview 3.1 states as follows

"Also noting the availability of trademark-like protection under certain national legal doctrines (e.g., unfair competition or passing-off) and considerations of parity, where acquired distinctiveness/secondary meaning is demonstrated in a particular UDRP case, unregistered rights have been found to support standing to proceed with a UDRP case including where the complainant is based in a civil law jurisdiction."

However, in the opinion of this Panel, notwithstanding the language used here that does not mean that a complainant can simply ignore the question of whether and in what jurisdictions those rights exist. It is still necessary to identify where those rights are claimed and if a non-common law jurisdiction is involved, then it is still incumbent on the complainant to identify the relevant local law doctrine (for example, unfair competition) out of which the equivalent rights are said to arise.

The difficulty the Panel faces in this case is that the Complainants have not done this. It merely claims such rights in abstract. However, ultimately the Panel is prepared to accept that the Complainants have such rights. The reasons for this are as follows:

1. The Panel is prepared to accept, absent any argument or evidence to the contrary, that the Complainants are each engaged in a global business
2. The Complainants' parent is listed on the Hong Kong Stock Exchange. Also, one of the Complainants is incorporated in and conducts business out of Singapore. Both Hong Kong and Singapore are territories that recognise common law trade mark rights in the form of rights under the law of passing off.

In the circumstances, and in the absence of evidence or argument to the contrary, the Panel accepts that relevant rights exist in the term MAXCLAW.

Finally, there is the question of whether it is the Complainants who have those rights. Exactly what the Complainants do, and their involvement with the MAXCLAW system, could have been better explained. However, the Panel is prepared to accept that either they are the owners of relevant rights by reason of their activities in connection with MAXCLAW or that they benefit from some sort of licence in relation to their use by reason of being part of the Minimax group (see section 1.4 of the WIPO Overview 3.1). This is also a conclusion that gains some circumstantial support from the fact that on 27 February 2026, Nanonoble applied for a trade mark in the United States for MAXCLAW.

It follows that the Complainants have, to the satisfaction of the Panel, shown that the Domain Name is identical or confusingly similar to a trade mark or service mark in which the Complainants have rights (within the meaning of paragraph 4(a)(i) of the Policy).

NO RIGHTS OR LEGITIMATE INTERESTS

For the reasons explained in greater detail in the context of the part of this decision that deals with registration and use in bad faith, the Panel is satisfied that the Respondent registered the Domain Name in order to target rights that the Complainants either had, or were likely shortly to acquire, following the launch of their MAXCLAW product, and in order to falsely impersonate the Complainants and/or the Complainants' group. There is no right or legitimate interest in holding a domain name for the purpose of falsely impersonating a trade mark owner (see section 2.5 of the WIPO Overview 3.1), and the fact that a domain name is or has been used for such a purpose is evidence that no such right or legitimate interest exists.

Accordingly, the Complainants have, to the satisfaction of the Panel, shown that the Respondent has no rights or legitimate interests in respect of the Domain Name (within the meaning of paragraph 4(a)(ii) of the Policy).

BAD FAITH

The Panel is satisfied that the Respondent registered the Domain Name in order to target rights that the Complainants either had or were likely to shortly have following the launch of its MAXCLAW product, and in order to falsely impersonate the Complainants and/or the Complainants' group. The reasons for this are as follows:

i. The timing of the registration is of itself evidence of the fact that the Respondent was targeting the Complainants, in that the registration took place just hours after the Complainants' product was launched on X and on WeChat.
ii. The content of the website operating from the Domain Name which, as is described in the Factual Background of this decision, falsely represented that this was a website being operated by or with the authority of the Complainants.

To register and use a domain name that falsely impersonates and thereby takes unfair advantage of another's trade mark rights provides a clear example of registration and use in bad faith.

It seems likely that by the time that the Domain Name was registered, the Complainants had already generated unregistered trade mark rights in the term MAXCLAW. But even if this is not right, it does not matter, since this is a case where the Respondent would still have been attempting to unfairly capitalise on the Complainants' nascent unregistered rights. This is therefore a case of the sort expressly referred to in section 3.8.2 of the WIPO Overview 3.1.

It makes no difference to this analysis that the Respondent sent an email to the CAC referring to an application it had made in the United States for a registered trade mark. First, the email was not a compliant Response in that it was accompanied by the formal requirements of a response set out in paragraph 5(c)(viii) of the Rules (as to the significant of which see this Panel's reasoning in Audiotech Systems Ltd. v. Videotech Systems Ltd. WIPO Case No. D2008-0431 and MMJ Apparel IP LLC v. Krix Luther WIPO Case No. D2025-3031). Second, there was a complete failure to explain why this application was of any relevance. In the absence of that explanation, the Panel is satisfied that the application can be merely dismissed as having been filed in response to the Complaint.

The Panel also accepts that the discrepancy between the registration details used for the Domain Name and the name and address used by the Respondent to apply for a United States registered trade mark, and in particular the use of a false reference to California in the address details used for the Domain Name, also supports a finding of bad faith.

Accordingly, the Complainant has, to the satisfaction of the Panel, shown the 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

Upon review of the case file, the Panel filed a notice on the CAC's UDRP platform on 11 June 2026 as follows:

> "Notification of Payment of Additional UDRP Fee
>
> In accordance with paragraph 1 (b) of Annex A of UDRP Supplemental Rules of the Czech Arbitration Court the Panel hereby determines that these are proceedings where it would be appropriate for the Complainant to pay the Additional UDRP Fee of 300 EUR within 5 days of receipt of this notification. If the Additional UDRP Fee is not paid within the prescribed time period, the Complaint shall be deemed withdrawn.
>
> Further details will be provided in this respect when the Panel issues its decision in this matter."

The notice was also filed with the following subject line, "Notification of determination of payment of additional fee in accordance with paragraph 1(b) of Annex A of the UDRP Supplemental Rules".

The Panel understands that upon the filing of this notice the CAC platform would have sent an automated email to the parties notifying them of the notice. However, it appears that thereafter the CAC sent (a) a further email to the Complainants' advisers on 18 June 2026 notifying them of "important information" on the platform, but not of the nature of the notice, and (b) further emails on 23 June 2026, referring to the fact that the original notification had yet to be viewed by the Complainants and expressly pointing out the need to make an additional payment.

On 25 June 2026, the Complainants filed a supplemental submission on the platform, and on 26 June 2026 sent an email to the CAC stating that the additional fee had been paid. The additional fee was received by the CAC that same day.

The original reason why the Panel issued a notice requiring an additional fee, was the additional complexity in this case arising from (a) from the fact that the claim was advanced by multiple complainants (combined with extensive evidence of the Complainants' relationship with one another) (b) the fact that the Complainants had advanced a case based upon unregistered rights, which added a level of complication and analysis over that usually required where registered rights are involved, and (c) the Respondent had filed a document which although non-compliant as a Response, still needed to be addressed in any decision. The fact that the Complainants filed an unsolicited further submission after the giving of the notice is yet a further complication in this case that justified the notice.

However, the giving of the notice and the circumstances of the payment of the relevant fee have added a further substantial procedural complication in this case.

The relevant provision in the CAC's UDRP Supplemental Rules regarding payment of an additional fee is at paragraph 1 following the table of fees in Annex A. It states as follows:

"The Complainant must pay the Additional UDRP Fees within 5 days of notification by the Provider or, after its appointment, the Panel when (a) a Response is filed that is in administrative compliance with Art. 5 of the Rules; or (b) the Panel determines that it is appropriate for the Complainant to pay the Additional UDRP Fees, having regard to the complexity of the proceeding. If the Additional UDRP Fees are not paid within the prescribed time period, the Complaint will be deemed withdrawn."

The wording here merely refers to notification, and notification for these purposes will usually mean the sending of an automated email by the platform when either a Response or the Panel's notification is filed.

However, the CAC's standard form for notification uses slightly different language from the CAC Supplemental Rules. It states that the relevant fee must be paid:

> "within 5 days of receipt of this notification"

The difference in language is unfortunate in that it suggests that the time for payment only starts to run when the notification is actually sent to or opened by the recipient on the platform or perhaps, when a complainant is expressly informed that the Panel has determined that an extra fee is paid.

In this case, the first date upon which it appears that the request for an additional fee was brought expressly to the Complainants' attention was in emails dated 23 June 2026. The additional fee was paid 3 days later on 26 June 2026.

In the view of the Panel on a proper reading of the CAC Supplemental Rules, payment should have been made in this case much earlier and no later than 16 June 2026.

Nevertheless, under paragraph 10(a) of the Rules, the Panel has a wide discretion to conduct proceedings in a manner it considers appropriate, provided that this is not at odds with the Policy and those Rules. Further, under paragraph 10(c) of the Rules, the Panel is able in exceptional cases to extend any period of time fixed by the Rules. The 5-day payment period is a requirement not of the Rules but of the CAC Supplemental Rules. Nevertheless, the Panel is of the view that it has the power under paragraph 10(a) of the Rules in a suitable case to extend the 5-day period also.

In the circumstances, and in particular bearing in mind the potentially confusing way in which the standard notice of payment is expressed, the Panel is prepared to grant an extension of time for payment until 26 June 2026, such that the Complaint is not deemed withdrawn. However, other Panels may not be prepared to be so forgiving.

It also follows that the Panel considers it appropriate to extend the time for its decision in this matter until 6 July 2026.

PRINCIPAL REASONS FOR THE DECISION

The Domain Name was registered within a matter of hours following the Complainants' announcement of the launch of their MAXCLAW product. Thereafter, the Domain Name was used for a website that falsely impersonated the Complainants and/or the group of companies to which they belong.

The Panel is satisfied that by the time the Domain Name was registered, the Complainants may have benefited from unregistered trade mark rights in the term MAXCLAW, by reason of the extensive coverage of, and interest in, that launch. However, even if this was not the case, the Complainants more likely than not benefited from such rights as of the date of the filing of their Complaint in these proceedings. Accordingly, the Panel held that the Complainants had satisfied the requirements of paragraph 4(a)(i) of the Policy.

There is also no right or legitimate interest in registering a domain name to falsely impersonate a rights holder and such registration is positive evidence that no such rights or legitimate interests exist. Registration and use of a domain name for such a purpose is also registration and use in bad faith. Accordingly, the Panel held that the Complainants had satisfied the requirements of paragraph 4(a)(ii) and (iii) of the Policy.

There were a number of complications in this case that meant it was appropriate to provide notice that the Complainants should pay an additional fee. These comprised (a) the fact that the claim was advanced by multiple complainants (b) the fact that the Complainants had advanced a case based upon unregistered rights, which required additional analysis, (c) the Respondent had filed a document which, although non-compliant as a Response, still needed to be addressed in any decision, and (d) the Complainants have filed an unrequested submission.

The additional fee was not paid within the 5-day period required by paragraph 1 following the table of fees in Annex A of the CAC's Supplemental Rules. Nevertheless, the fee was paid, and the Panel formed the view that it both had the power and it was appropriate to extend the time for payment, such that the Complaint was not deemed automatically withdrawn.

FOR ALL THE REASONS STATED ABOVE, THE COMPLAINT IS

Accepted

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

1. **maxclaw.ai**: Transferred

PANELLISTS

Name	**Matthew Harris**

DATE OF PANEL DECISION 2026-07-04

Publish the Decision