

ADMINISTRATIVE PANEL DECISION

Reliance Industries Limited v. JioSh URL Private Limited
Case No. D2026-0234

1. The Parties

The Complainant is Reliance Industries Limited, India, represented by Ajay Sahni & Associates, India.

The Respondent is JioSh URL Private Limited, India, represented by Amar Patil & Company, India.

2. The Domain Name and Registrar

The disputed domain name <jiosh.menu> is registered with eNom, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on January 21, 2026. On January 21, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 21, 2026, 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 and contact information in the Complaint. The Center sent an email communication to the Complainant on January 23, 2026, 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 January 23, 2026.

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, and the proceedings commenced on January 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 17, 2026. The Response was filed with the Center on February 16, 2026.

The Center appointed Steven A. Maier as the sole panelist in this matter on February 24, 2026. 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 multinational conglomerate, headquartered in India. Among its business interests, it provides telecoms and related services under the name and trademark JIO.

The Complainant is the proprietor of a large number of registrations for the trademark JIO, particularly in India. Those registrations include, for example:

- India trademark registration number 2247360 for a combined mark JIO, registered on December 9, 2011, in International Class 38;
- India trademark registration number 2391606 for the word mark JIO, registered on September 7, 2012, in International Class 7; and
- India trademark registration number 3016543 for a combined mark comprising the stylized text JIO on a circular background, registered on July 27, 2015, in International Class 9:

The Complainant operates a website at “www.jio.com”.

The Respondent registered the disputed domain name on June 16, 2025.

On June 3, 2021, the domain name <jio.sh> was registered by an entity named Hanama International. The Respondent appears to have been the successor in interest to Hanama International with respect to the domain name <jio.sh>. On January 6, 2026, a prior panel under the Policy ordered that the domain name <jio.sh> registered by the Respondent be transferred to the Complainant.¹

The Respondent company was incorporated in India on August 10, 2022. On August 14, 2022, the Respondent applied for Indian trademarks for the word mark JIOSH, and for a figurative mark comprising the text JIO connected by two chain links to the text “.sh” (the “Respondent’s Logo”), followed by the wording “Refine & redefine your Links”, in International Class 42:

The Respondent’s trademark applications have been opposed by the Complainant and their status is unresolved as at the date of this Decision.

The Complainant has brought proceedings before the Ministry of Corporate Affairs, Mumbai, India, seeking rectification of the name of the Respondent on the ground that it was identical with, or too closely resembled, the name of the Complainant. By an order dated June 26, 2025, the Complainant’s application was dismissed. The Complainant states that that decision is under challenge in the High Court of Bombay.

On July 3, 2025, the disputed domain name resolved to a website headed with the Respondent’s Logo (but omitting the textual strapline included in its trademark application). The website stated: “JioSh Menu is a smart digital platform that helps restaurants, cafés, big hotels, and cloud kitchens manage everything from orders to billing, reservations, kitchen display, and customer experience. It brings all your restaurant operations into one easy-to-use system.”

On January 21, 2026, and at the date of this Decision, the disputed domain name did not appear to resolve to any active website.

¹*Reliance Industries Limited v. Navinkumar Mali, Henama International / JioSh URL Private Limited*, WIPO Case No. [DSH2025-0002](#)

5. Parties' Contentions

A. Complainant

The Complainant states that it operates India's largest telecoms network, as well as numerous ecommerce trading businesses under the JIO mark. It submits that it has invested over USD 50 billion since launch, its JIO trademark having been adopted in 2011 and announced to the public in 2013. It states that it achieved over 100 million subscribers within 120 days of launch, and had exceeded 500 million customers by September 2025.

The Complainant submits that its businesses under the JIO mark include connectivity, cloud media, digital commerce, financial services, gaming, education, healthcare, agriculture, government-to-citizen services, smart cities and manufacturing. It claims over 1,400 trademark registrations for or including the mark JIO, and lists a large number of longstanding India trademark registrations reflecting its services, including for example JIOGAMES, JIOFINANCE, JIOENTERTAINMENT, JIOMUSIC and JIOWEBSTORE. It states that its activities in these areas extend internationally and encompass content across genres and languages.

The Complainant submits that, by virtue of its above activities, and its extensive promotion of the JIO mark through advertising, promotions and various partner activities, that trademark has gained the status of a famous or well-known trademark. It cites a judgment from 2021 in the High Court of Bombay (in unrelated trademark proceedings), in which the Judge stated that the Complainant "needed no introduction" and that "it is now safe to say that JIO is a well-known trademark".²

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

The Complainant submits that the disputed domain name is confusingly similar to its JIO trademark, by virtue of the fact that it wholly incorporates that trademark.

The Complainant contends that the Respondent has no rights or legitimate interests in respect of the disputed domain name. It states that it is not affiliated with the Respondent in any manner, and has never licensed or authorized it to use its JIO trademark. It submits that the Respondent is making neither bona fide commercial use nor legitimate noncommercial or fair use of the disputed domain name, and has registered and used it purely for the purpose of causing confusion with the Complainant's trademark.

The Complainant states that its JIO mark is a coined term which is inherently distinctive, has been used by the Complainant since 2011, and is exclusively associated with the Complainant. It submits that the Respondent's registration of the disputed domain name, and the prominent use of the Respondent's Logo on its website, can only be explained by an intention to deceive the public into believing that its website must be legitimately connected with the Complainant. The Complainant speculates that the Respondent therefore registered the disputed domain name to sell it to the Complainant for an inflated price, and/or to impersonate the Complainant for the purpose of data theft.

For similar reasons, the Complainant submits that the disputed domain name was registered and is being used in bad faith. It asserts, in particular, that the Respondent is using the disputed domain name to attract unsuspecting visitors to its website, for financial gain, by causing a likelihood of confusion with the Complainant's JIO trademark.

The Complainant requests the transfer of the disputed domain name.

²*Reliance Industries Ltd and Anr v. Asbok Kumar*, Commercial Suit (L) No. 14473 of 2021

B. Respondent

The Respondent denies that the disputed domain name is confusingly similar to the Complainant's JIO trademark. It contends that the term "JioSh" is an independently coined expression with a distinct commercial identity. It states that the suffix "sh" materially alters the visual, phonetic and conceptual impression conveyed, and that the Complainant improperly dissects the disputed domain name by isolating the three-letter JIO string.

The Respondent submits that the term JIO is not in any event exclusively the Complainant's property, and that it is linguistically derived from commonly-used expressions meaning "live" or "be alive". It exhibits an (unattributed) dictionary definition of JIO as "live life". The Respondent adds that the use of the Top Level Domain ("TLD") ".menu" further distinguishes the disputed domain name from the Complainant's JIO trademark.

The Respondent contends that it operates under the name "JioSh URL Private Limited", and is therefore commonly known by the disputed domain name, and has rights or legitimate interests in respect of it (paragraph 4(c)(ii) of the Policy). It states that it uses the disputed domain name in connection with bona fide technology services, namely SaaS-based digital solutions, including URL shortening, QR codes and online visibility tools.

The Respondent submits that the finding of the Ministry of Corporate Affairs, dismissing the Complainant's application to reject the Respondent's corporate name, is also evidence of its legitimacy.

The Respondent denies that it has made any attempt to imitate, or derive unfair benefit from, the Complainant's trademark. It states that its website makes no reference whatsoever to the Complainant, its branding or its business activities, and makes no mention of telecommunications. It submits that it has never offered the disputed domain name for sale, whether to the Complainant or to any other party.

The Respondent adds that it has no history of cybersquatting.

6. Discussion and Findings

In order to succeed in the Complaint, the Complainant is required to show that all three of the elements set out under paragraph 4(a) of the Policy are present. Those elements are that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;
- (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) 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 of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has established that it is the owner of numerous trademark registrations for the mark JIO. As observed in section 1.8 of [WIPO Overview 3.1](#), where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element, although the nature of such additional terms may however bear on assessment of the second and third

elements. Similarly, the TLD “.menu” may be disregarded for the purpose of comparison between the disputed domain name and the Complainant’s trademark under the first element.

The Panel finds in this case that the Complainant’s JIO mark is recognizable within the disputed domain name, and that the disputed domain name is therefore confusingly similar to the Complainant’s trademark. The first element under the Policy is therefore established.

B. Rights or Legitimate Interests, and C. Registered and Used in Bad Faith

The Panel considers it convenient in this case to review the second and third elements under the Policy together, since similar considerations will inform its findings in respect of both such elements.

The Respondent operates as JioSh URL Private Limited, having been incorporated under that name in India in August 2022. While its incorporation and subsequent activities under that name may point to rights or legitimate interests in respect of the disputed domain name, the key question for the Panel is whether its name and activities represent a bona fide business venture independent of the Complainant and its trademark rights, or alternatively, an attempt to benefit unfairly from the Complainant’s business goodwill by deliberately and misleadingly associating itself with the Complainant.

The Panel finds the latter scenario to be the case, principally for the following reasons.

First, the Panel finds that the Complainant’s JIO trademark is widely known and has gained the status of a famous trademark in India. The Respondent is also located in India. The Panel finds it inconceivable in the circumstances that Respondent was unaware of the Complainant’s trademark and its notoriety when it registered both its company name and the disputed domain name.

Secondly, while the Respondent claims that the name “JioSh” is separate from the Complainant’s mark JIO and independently distinctive, the Panel cannot ignore the fact that the Respondent originally used the domain name <jio.sh>, which is identical to the Complainant’s trademark, ignoring the TLD “.sh”. Moreover, the Respondent has carried forward its use of the Respondent’s Logo, essentially comprising a figurative representation of the <jio.sh> name, to the website to which the disputed domain name resolves.

Thirdly, although it claims that the name JIO is not exclusive to the Complainant and has an independent dictionary meaning (while at the same time denying that it has appropriated that name), the Respondent offers no specific explanation for its choice of the name “JioSh” for its business, the disputed domain name, or the website to which the disputed domain name resolves. The lack of any such explanation does nothing to displace the inference of targeting the Complainant’s trademark by the domain name <jio.sh> and subsequently the disputed domain name in this proceeding.

Fourthly, the Respondent’s explanation of its supposed business does not appear to bear any relationship to the website content to which the disputed domain name resolved in July 2025. While the Respondent asserts in the Response that it offers technology services including SaaS-based digital solutions such as URL shortening, QR codes and online visibility tools, its website was directed to a digital platform for restaurants, cafés, hotels and kitchens to manage orders, billing, reservations, kitchen displays, and customer experience. However, the Response makes no reference to this website content. Moreover, the disputed domain name no longer appears to be active.

Taking all the above matters into account, the Panel finds that the Respondent’s case lacks credibility, and that, on the balance of probabilities, the disputed domain name was registered in order to target the Complainant’s JIO trademark. The Panel finds further that, by using the disputed domain name, the Respondent has intentionally attempted to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant’s trademarks as to the source, sponsorship, affiliation, or endorsement of its website or of a product or service on its website (paragraph 4(b)(iv) of the Policy).

The Panel does not consider the decision of the Indian Ministry of Corporate Affairs to be material to this case, since that decision appears to have related purely to a comparison of the Parties' corporate names, and not to involve the various factors properly to be considered in relation to the second and third elements under the Policy.

Nor do the Respondent's as yet unresolved trademark applications invest it with rights or legitimate interests in respect of the disputed domain name. The Panel also notes that, even if such applications had been granted, the registration of a trademark is not conclusive of rights or legitimate interests if it can be shown that the trademark was obtained primarily to circumvent the operation of the Policy (see section 2.12 of [WIPO Overview 3.1](#)).

The Panel finds in the circumstances that the Respondent has no rights or legitimate interests in respect of the disputed domain name, and that the disputed domain name was registered and is being used in bad faith. The second and third elements under the Policy are therefore established.

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 <jiosh.menu> be transferred to the Complainant.

/Steven A. Maier/

Steven A. Maier

Sole Panelist

Date: March 10, 2026