

ADMINISTRATIVE PANEL DECISION

Playsaurus Inc., DashNet B.V. v. Trach Huynh, WEBREQUA; Timur Voronin; Artem Rutkovsky, OOO KreoBits; Vladislav Zhelkovskii
Case No. D2025-3144

1. The Parties

The Complainants are Playsaurus Inc., United States of America (“United States”), and DashNet B.V., Netherlands, represented by MGL LLP, United States. The Complainants are together referred as the “Complainant” if otherwise not specified.

The Respondents are Trach Huynh, WEBREQUA, and Timur Voronin, both Viet Nam; Artem Rutkovsky, OOO KreoBits, Russian Federation; and Vladislav Zhelkovskii, Kazakhstan.

2. The Domain Names and Registrars

The disputed domain names <cookieclicker.app> and <cookieclicker.me> are registered with Porkbun LLC. The disputed domain name <cookieclicker.games> is registered with Dynadot Inc. The disputed domain name <cookieclicker.one> is registered with NameCheap, Inc. The disputed domain name <cookieclicker.org> is registered with GoDaddy.com, LLC. Porkbun LLC, Dynadot Inc., NameCheap, Inc. and GoDaddy.com, LLC are hereinafter referred to as the “Registrars”.

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 6, 2025¹. On August 8, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. Between August 8, 2025, and August 11, 2025, the Registrars transmitted by email to the Center verification responses disclosing registrant and contact information for the disputed domain names which differed from the named Respondents (Private by Design, LLC, TotalDomain Privacy Ltd, Redacted for privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 9, 2025, with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants

¹The Complainant was initially filed in relation to six domain names, one of which was withdrawn from the Complaint during the proceeding.

are in fact the same entity and/or that the disputed domain names are under common control. The Complainant filed an amended Complaint on October 15, 2025.

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 Respondents of the Complaint, and the proceedings commenced on October 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 12, 2025. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on November 13, 2025.

The Center appointed Mathias Lilleengen as the sole panelist in this matter on November 20, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant DashNet B.V. created the web-browser based game Cookie Clicker in 2013. It garnered 50,000 players in only one hour. Since then, it has been continuously available online. The game has undergone numerous updates, and it is currently on version 2.052. In 2021, the Complainant published Cookie Clicker on Steam. Cookie Clicker quickly became one of the most popular titles on this platform. In May 2025, the Complainant Playsaurus Inc. announced that Cookie Clicker would be ported to most major consoles, including PlayStation 5, Xbox One, and Nintendo Switch. DashNet B.V. has maintained an exclusive license with Playsaurus Inc. to publish the Cookie Clicker game with both parties maintaining rights to pursue rights violations. Therefore, the Panel finds that DashNet B.V. and Playsaurus Inc. can jointly file the Complaint.

According to the Complaint, the disputed domain names <cookieclicker.me> and <cookieclicker.app> were registered on June 4, 2022, <cookieclicker.org> was registered on November 11, 2015, <cookieclicker.games> was registered on April 13, 2020, and the disputed domain name <cookieclicker.one> was registered on October 25, 2022. The Complainant has documented that the disputed domain names have without authorization resolved to websites containing copies of the Complainant's game Cookie Clicker. The websites at the disputed domain names <cookieclicker.games> and <cookieclicker.one> also contain other third party games at the time of filing of the Complaint.

5. Parties' Contentions

A. Complainant

The Complainant argues that the disputed domain names are under common control of the same person or entity because the disputed domain names are similar in structure and spelling. They are all composed of the Complainant's COOKIE CLICKER trademark, as well as various generic Top-Level extensions. The Complainant alleges that "numerous of the domains are registered to the same individual, and more than half of the domains specifically to the country of Viet Nam. Additionally, each domain name resolves to a website with the identical material and content, namely, the Complainant's game, all in a matching identical form", and "all have used privacy shields to mask identity when registering such sites".

The Complainant argues that it has common law trademark rights in the mark COOKIE CLICKER as the trademark is used continuously and without interruption since 2013 globally. The Complainant offers evidence to this end and argues that the trademark has acquired a secondary meaning that consumers associate with the Complainant's goods and services. The trademark is recognizable within the disputed

domain names. The Complainant also claims that the disputed domain names are confusingly similar to the Complainant's trademark.

The Complainant argues that the Respondents have no rights or legitimate interests in respect of the disputed domain names. The Complainant has not licensed or authorized the Respondents to use its trademark. The Respondents have not been commonly known by the disputed domain names. The disputed domain names have directed Internet users to websites that contain copies of the Complainant's Cookie Clicker game. Such use is not fair use as it impersonates or suggests sponsorship or endorsement by the trademark owner.

The Complainant argues that "the registration of the Complainant's trademarks pre-dates the registration of the Disputed Domain Names". Given the use of the Complainant's trademark, the Complainant finds it inconceivable that the Respondents were unaware of the existence of the Complainant when the Respondents registered the disputed domain names. The use of the disputed domain names - websites containing unauthorized copies of the Complainant's game – cannot confer rights or legitimate interests. Said use is evidence of bad faith to attract, for commercial gain, Internet users by creating a likelihood of confusion with the Complainant's trademark as to the source, sponsorship, affiliation, or endorsement.

B. Respondents

The Respondents did not reply to the Complainant's contentions.

6. Discussion and Findings

6.1. Procedural Matters

A. Consolidation of Respondents

The Complaint was filed in relation to nominally different domain name registrants. The Complainant argues that the domain name registrants are the same entity or under common control. The Complainant requests consolidation of the disputes against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules. Paragraph 3(c) of the Rules states that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. In addressing the Complainant's request, the Panel will consider whether (i) the disputed domain names or corresponding websites are subject to common control; and (ii) the consolidation would be fair and equitable to all Parties. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.11.2.

As regards the common control, the Panel notes that two of the disputed domain names were registered through the same registrant details, and that a third registration is also linked to Viet Nam. All the disputed domain names are identical to the Complainant's trademark with different Top-Level Domains. Importantly, it appears that the corresponding websites are subject to common control, as three of the disputed domain names have resolved to virtually identical websites with the remaining disputed domain names having resolved to similar websites, all of which have contained the Complainant's game.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. The different domain name registrants have not objected to the Complainant's consolidation request.

Accordingly, the Panel decides to consolidate the disputes regarding the nominally different disputed domain name registrants (referred to as "the Respondent") in a single proceeding.

B. Status of the Disputed Domain Name <cookieclicker.one>

As a preliminary matter, the Panel will address the status of the disputed domain name <cookieclicker.one>. The disputed domain name expired on October 25, 2025. On November 20, 2025, the Registrar NameCheap, Inc. confirmed the disputed domain name has been locked and will remain so “until the earlier of the conclusion of the UDRP proceeding or deletion of the disputed domain name and release to general availability”, and confirmed the disputed domain name can be renewed by either Party for a fee. On November 20, 2025, the Center informed the Parties of the Registrar’s instruction regarding renewal of the disputed domain name.

At the time of this decision, there is no confirmation from the Parties or the Registrar regarding whether or not the disputed domain name has been renewed. The Panel notes from the public Whois, the expiry date remains as October 25, 2025, and it is currently under “autoRenewPeriod”. Noting the disputed domain name remains active, the Panel shall proceed to issue a decision. However, noting the scope of this proceeding, the Panel confirms that the implementation of the decision is limited to the present registration to the extent the disputed domain name may remain active, and is not directed to future potential registrations.

6.2. Substantive Issues

A. Identical or Confusingly Similar

The test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant’s trademark and the disputed domain names. See [WIPO Overview 3.0](#), section 1.7.

The Complainant has established common law rights in the trademark COOKIE CLICKER as it has documented that the mark has become a distinctive identifier which consumers associate with the Complainant’s game. See [WIPO Overview 3.0](#), section 1.3.

The disputed domain names are identical to the Complainant’s trademark. For the purpose of assessing the confusing similarity under paragraph 4(a)(i) of the Policy, the Panel may ignore the Top-Level Domains. See [WIPO Overview 3.0](#), section 1.11.

Based on the available record, the Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy provides a list of circumstances in which the respondent may demonstrate rights or legitimate interests in a disputed domain name. While the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving a respondent lacks rights or legitimate interests in a domain name may result in the often impossible task of “proving a negative”, requiring information that is often primarily within the knowledge or control of the respondent. As such, where a complainant makes out a prima facie case that the respondent lacks rights or legitimate interests, the burden of production on this element shifts to the respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the domain name. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. See [WIPO Overview 3.0](#), section 2.1.

Having reviewed the record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names. The Respondent has not rebutted the Complainant’s showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain names. The Respondent is not affiliated or related to the Complainant. There is no evidence that the Respondent has registered the disputed domain names as a trademark or acquired trademark rights. There is no evidence of the Respondent’s use of, or demonstrable preparations to use, the disputed domain names or names corresponding to the disputed domain names in connection with a bona fide offering of goods or services. On the contrary, the disputed domain names have been used for websites that provide unauthorized offers of the Complainant’s game.

Moreover, the composition of the disputed domain names, being identical to the Complainant's trademark, carries a high risk of implied affiliation. [WIPO Overview 3.0](#), section 2.5.1.

Based on the available record, the Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

The Panel notes that for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular but without limitation, that if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith.

The incorporation of the Complainant's trademark in the disputed domain names, and the use of the disputed domain names, prove that the Respondent was aware of the Complainant and its prior rights when the Respondent registered the disputed domain names. The registration and use of the disputed domain names is clear evidence of bad faith within the meaning of paragraph 4(b)(iv) of the Policy. The Respondent has intentionally attempted to attract, for commercial gain, Internet users to its websites by creating a likelihood of confusion with the Complainant's trademark.

For the reasons set out above, the Panel concludes that the disputed domain names were registered and are being used in bad faith, within the meaning of paragraph 4(a)(iii) of the Policy. The third element of the Policy has been established.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders the disputed domain names <cookieclicker.app>, <cookieclicker.games>, <cookieclicker.me>, <cookieclicker.one> and <cookieclicker.org> transferred to the Complainant².

/Mathias Lilleengen/

Mathias Lilleengen

Sole Panelist

Date: November 28, 2025

²As provided in section 6.2., the order of transfer of the disputed domain name <cookieclicker.one> is limited to the current registration, to the extent it may remain active.