

ADMINISTRATIVE PANEL DECISION

Netflix Studios, LLC v. Jas King
Case No. D2025-3459

1. The Parties

The Complainant is Netflix Studios, LLC, United States of America (“United States”), represented by Coates IP LLP, United States.

The Respondent is Jas King, China.

2. The Domain Name and Registrar

The disputed domain name <kpop-demon-hunters-tiger-plushies.com> (the “Domain Name”) is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 27, 2025. On August 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On August 28, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (UNKNOWN RESPONDENT) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 1, 2025, 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 September 2, 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 Respondent of the Complaint, and the proceedings commenced on September 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 1, 2025. The Respondent then sent an email communication to the Center on October 2, 2025.

The Center appointed Ian Lowe as the sole panelist in this matter on October 10, 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 by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant is a company founded in 1997, based in California, United States. Its streaming service was launched in 2007 and it is now one of the world's leading entertainment services with over 302 million paid memberships in over 190 countries, accessing television series, films and games across a wide variety of genres and languages. In March 2021, the Complainant announced the production of its KPOP DEMON HUNTERS film. The film was released on June 20, 2025. It is an animated musical urban fantasy film that follows a K-pop girl group called Huntr/X who lead double lives as demon hunters. The film was released to critical acclaim. On August 12, 2025, it was reported that the film had become the Complainant's second-most popular English language film, being viewed 184.6 million times in the eight weeks following its premiere. The Complainant has launched an online KPOP DEMON HUNTERS store, offering a variety of merchandise and clothing at "www.netflix.shop/collections/kpop-demon-hunters".

The Complainant has filed a number of applications for registered trademarks for KPOP DEMON HUNTERS in several territories, including the United States, the United Kingdom and the European Union, all but one of which is pending. It is, however, the proprietor of United Kingdom trademark KPOP DEMON HUNTERS number 00004238112 registered on October 17, 2025 in Classes 21, 25 and 28.

The Domain Name was registered on June 22, 2025. It resolves to an online retail store offering a range of what purport to be KPOP DEMON HUNTERS merchandise (the "Respondent's Website") using the KPOP DEMON HUNTERS brand. The banner of the home page carries a stylised KPOP DEMON HUNTERS logo. The merchandise offered for sale includes a Kpop Demon Hunters Tiger Plush soft toy which is substantially identical to that sold by the Complainant:



Respondent's Tiger Plush



Complainant's Tiger Plush

The Respondent's Website does not give any information as to the identity of the operator of the website or of the seller of the goods offered for sale, but the contact details include an address for the "Head Office" in California, United States. In addition, it states at the foot of the home page: "Welcome to Officially Licensed Kpop Demon Hunters Tiger Plush Store."

5. Parties' Contentions

A. Complainant

The Complainant contends that the Domain Name is confusingly similar to its KPOP DEMON HUNTERS trademark (the "Mark") in which it claims unregistered common law trademark rights, that the Respondent has no rights or legitimate interests in respect of the Domain Name and that the Respondent registered and is using the Domain Name in bad faith within the meaning of paragraph 4(b)(iv) of the Policy.

B. Respondent

The Respondent did not reply formally to the Complainant's contentions. In its email to the Center on October 2, 2025, after notification of the Respondent's default, it stated "We would like to suspend the present dispute. This may be caused by a misunderstanding".

6. Discussion and Findings

For this Complaint to succeed in relation to the Domain Name the Complainant must prove that:

- (i) the Domain Name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (ii) the Respondent has no rights or legitimate interests in respect of the Domain Name; and
- (iii) the 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 Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

As section 1.1 of the [WIPO Overview 3.0](#) makes clear, however, Panels have consistently held that a pending trademark application does not by itself establish trademark rights within the meaning of paragraph 4(a)(i) of the Policy. Furthermore, although the Policy makes no specific reference to the date on which the holder of the trademark (or service mark) acquired its rights, such rights must be in existence at the time the complaint was filed ([WIPO Overview 3.0](#), section 1.1.3). In this case, at the time the Complaint was filed, the Complainant held no registered trademark rights.

Section 1.3 of [WIPO Overview 3.0](#) sets out some guidance on what a complainant needs to show to establish unregistered or common law trademark rights for the purposes of the Policy. In particular:

"...the complainant must show that its mark has become a distinctive identifier which consumers associate with the complainant's goods and/or services... Particularly with regard to brands acquiring relatively rapid recognition due to a significant Internet presence, panels have also been considering factors such as the type and scope of market activities and the nature of the complainant's goods and/or services."

Although only a short period elapsed between the release of the Complainant's KPOP DEMON HUNTERS film on June 20, 2025, and the filing of the Complaint on August 27, 2025, the Complainant has adduced evidence that in that time the film quickly became one of the platform's most watched films and by August 12, 2025 had been viewed 184.6 million times in the eight weeks following its premiere. The Panel is therefore satisfied that by the time of filing of the Complaint, the Mark had become a distinctive identifier that consumers associated with the Complainant.

In addition, “The fact that a respondent is shown to have been targeting the complainant’s mark (e.g., based on the manner in which the related website is used) may support the complainant’s assertion that its mark has achieved significance as a source identifier”. ([WIPO Overview 3.0](#), section 1.3). Here, the nature of the Respondent’s Website and its offering for sale merchandise clearly directed at the Complainant’s KPOP DEMON HUNTERS film and merchandise, strongly supports the proposition that by the time of filing of the Complaint the Complainant had established common law rights in the Mark.

Accordingly, the Panel finds that the Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

Ignoring the generic Top-Level Domain “.com”, the Domain Name comprises the entirety of the Mark, with the addition of four hyphens and the words “tiger plushies”. The Panel finds that these additions do not prevent a finding of confusing similarity between the Domain Name and the Mark. [WIPO Overview 3.0](#), section 1.8.

Accordingly, the Panel finds that the Domain Name is confusingly similar to a trademark in which the Complainant has rights, and 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.

Although 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 difficult task of “proving a negative”, requiring information that is often primarily within the knowledge or control of the respondent. Accordingly, 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 (although the burden of proof always remains on the complainant). If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

The Complainant has made out a strong prima facie case that the Respondent could have no rights or legitimate interests in respect of the Domain Name. The Respondent is using the Domain Name for a website purporting to offer for sale a range of “Kpop Demon Hunters Merch” and claiming to be an “Officially Licensed Kpop Demon Hunters Tiger Plush Store”. The evidence indicates that the Complainant has not licensed or otherwise authorized the Respondent to use the Mark and there is no evidence that the Respondent has been commonly known by the Domain Name. The Panel considers it probable that the merchandise offered for sale on the Respondent’s Website is counterfeit as alleged by the Complainant.

The Panel notes that the “About Us” page of the Respondent’s Website states “Welcome to the home of the *K-Pop Demon Hunters* Tiger Plush — where fandom meets folklore in the cutest way possible. We’re a passionate team of animation lovers, K-pop fans, and plushmakers who fell in love with the mystical tiger from *K-Pop: Demon Hunters* and knew it deserved a place in the real world”. This may give rise to a possible argument that the Respondent is making fair use of the Domain Name. However, Section 2.7 of [WIPO Overview 3.0](#) states that “for purposes of assessing fair use under UDRP paragraph 4(c)(iii), a respondent’s fan site must be active, genuinely noncommercial, and clearly distinct from any official complainant site”. The Respondent’s Website is clearly commercial, and the Respondent sells similar products as offered on the Complainant’s website, without a clear disclaimer concerning the lack of relationship between the Parties. Accordingly, the Panel finds in the circumstances of this case that the Domain Name is not a fair use fan site within the meaning of the Policy.

The Respondent has chosen not to substantively respond to the Complaint or to take any steps to counter the prima facie case established by the Complainant. In the circumstances, the Panel finds that the Respondent does not have any rights or legitimate interests in respect of the Domain Name.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.0](#), section 3.2.1.

In light of the nature of the Domain Name and the use to which the Respondent has put the Domain Name, the Panel is in no doubt that the Respondent had the Complainant and its rights in the Mark in mind when it registered the Domain Name two days after the release of the Complainant's KPOP DEMON HUNTERS film.

Panels have held that the use of a domain name for illegitimate activity, here claimed to be the sale of counterfeit goods and impersonation/passing off, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. The Panel considers that the Respondent has registered and used the Domain Name to deceive Internet users into believing that the Domain Name is operated or authorized by the Complainant, attracting Internet users by creating a likelihood of confusion with the Mark. In the Panel's view, the use of a domain name for such activity, no doubt with a view to commercial gain, amounts to paradigm bad faith registration and use for the purposes of the Policy.

Accordingly, the Panel finds that the Domain Name has been registered and is being used in bad faith.

The Panel finds that the Complainant has established the third element of the Policy.

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 Domain Name <kpop-demon-hunters-tiger-plushies.com> be transferred to the Complainant.

/Ian Lowe/

Ian Lowe

Sole Panelist

Date: October 24, 2025