

ADMINISTRATIVE PANEL DECISION

MICROOLED v. 祝晓钊 (zhu xiao zhao)

Case No. D2026-0331

1. The Parties

The Complainant is MICROOLED, France, represented by WE ARE BOLD, France.

The Respondent is 祝晓钊 (zhu xiao zhao), China, self-represented.

2. The Domain Name and Registrar

The disputed domain name <microoled.com> is registered with Alibaba Cloud Computing (Beijing) Co., Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed in English and Chinese with the WIPO Arbitration and Mediation Center (the “Center”) on January 27, 2026. On the following day, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On January 29, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from the unnamed Respondent and contact information in the Complaint, and confirming that the language of the Registration Agreement for the disputed domain name is Chinese. The Center sent an email communication to the Complainant on January 29, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. On January 29, 2026, the Center received an email from a third party who claimed to be the registered owner of the disputed domain name. The Complainant filed an amended Complaint in English on January 30, 2026 in which it requested English to be the language of the proceeding. On February 1, 2026, the Respondent sent an email communication in English and Chinese to the Center in which he agreed to English being the language of the proceeding but asked to submit the Response in Chinese, with an English translation. He also denied any relationship with the third party that had contacted the Center and asked for the third party to be excluded from the proceeding.

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 in English and Chinese of the Complaint, and the proceedings commenced on February 4, 2026. In accordance with the Rules, paragraph 5, the due date for Response was February 24, 2026. The Response was filed with the Center in Chinese and English on February 23, 2026 and included a request for Chinese to be the language of the proceeding.

The Center appointed Matthew Kennedy as the sole panelist in this matter on March 3, 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 French company incorporated in 2007 that specializes in the development and manufacture of high-resolution, low-power OLED microdisplays and near-eye optical modules. According to a certificate by the Complainant's Chief Executive Officer, the company's total revenue increased significantly in 2020. The Complainant holds the trademark registrations below for the following semi-figurative MICROOLED mark:



- French trademark registration number 3554824, registered on July 18, 2008, specifying goods in class 9; and
- International trademark registration number 984669, registered on July 30, 2008, designating multiple jurisdictions, including China, and specifying goods in class 9.

These trademark registrations are current and they do not disclaim exclusive use of any term. The Complainant also registered the domain name <microoled.net> on March 12, 2007, which it has used since at least 2008 in connection with a website where it provides information about itself and its services. The website prominently displays part of the MICROOLED mark. An archived screenshot provided by the Complainant shows that in 2008 the website presented the Complainant's name as "MicroOLED".

The Respondent is an individual based in China. He is the former general manager and a former shareholder of a Chinese company named “苏州萃松光电有限公司” (“Suzhou Cuisong Optoelectronics Co., Ltd”, referred to below as “Suzhou Cuisong”), established in 2018 and licensed in China from March 16, 2020 for display device sales, among other activities. The company manufactures silicon-based OLED microdisplays.

The disputed domain name was created on November 25, 2015, acquired by Suzhou Cuisong in 2020, and acquired by the Respondent on September 29, 2023. The disputed domain name does not resolve to any active website; rather, it is passively held.

On or about October 9, 2025, the Complainant approached the Registrar via an intermediary regarding a possible purchase of the disputed domain name. The Registrar informed the intermediary that the disputed domain name registrant had quoted a sale price. The Complainant's intermediary then gave notice of the Complainant's Chinese trademark rights and alleged infringement but offered to explore a settlement. On November 13, 2025, the disputed domain name was offered for sale on a broker's website.

5. Parties' Contentions

A. Complainant

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

Notably, the Complainant contends that the disputed domain name is strictly identical to the Complainant's company name, trademark, and domain name.

The Respondent has no rights or legitimate interests with respect to the disputed domain name. The identity of the domain name registrant is hidden in the Registrar's Whois database. The Respondent has not been authorized by the Complainant to use its trademark or its domain name. Moreover, there is no business relationship between the Parties. The website associated with the disputed domain name, which has no content, does not indicate that the Respondent is using a business name, a company name, or a trademark for "Microoled".

The disputed domain name was registered and is being used in bad faith. The Complainant has been present on the Chinese market since 2013. Revenue generated in China increased significantly between 2019 and 2020. The disputed domain name was acquired by the Respondent, a Chinese national, at the time of the strong growth of the Complainant's business in China. The disputed domain name has not been used for any web or email purposes for five years. It is strictly identical to the Complainant's earlier trademarks, with the specific spelling including a double "o". The Respondent holds it for purely speculative purposes. It was purchased in fraud of the Complainant's rights for the sole purpose of selling it to the Complainant at an exorbitant price.

B. Respondent

The Respondent contends that the Complainant has not satisfied any of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Respondent contends that (i) "microoled" is a generally accepted technical term in the display industry that the Complainant does not have the right to monopolize. It is a compound word formed from "micro" and "OLED" (i.e., organic light-emitting diode) that refers to micro OLED displays. This word is used in the display industry to describe a specific technology and lacks the distinctiveness required for trademark protection. Numerous websites have defined "microoled". Research institutions and companies worldwide used the term prior to the Complainant's trademark application in 2008. Numerous industry players, including global OLED microdisplay manufacturers and terminal manufacturers, use "micro OLED" or "micro-OLED" as a product category name; (ii) the Complainant's trademark and the disputed domain name are significantly different, with no possibility of confusion. The Complainant has added the graphic logo precisely because "microoled" is a generic technical name; and (iii) the generic Top-Level Domain ("gTLD") extension ".net" in the disputed domain name clearly allows the relevant public to distinguish it from the Complainant's domain name in the ".com" gTLD.

The Respondent has rights and legitimate interests with respect to the disputed domain name for the following reasons (i) the Respondent disclosed his identity to the Registrar and the Complainant was able to contact him via the Registrar; (ii) the Complainant has no right to restrict the Respondent's legal use of a domain name on the basis of trademark rights; (iii) the disputed domain name was acquired by Suzhou Cuisong, a manufacturer of microOLED displays, which operated a website in connection with the disputed domain name in 2020 but temporarily ceased operation of the website due to changes in the company's business set-up; (iv) the Respondent was employed by Suzhou Cuisong from 2019, he participated in the drafting of the Technical Specification for a Chinese standard for silicon-based OLED Microdisplays (T/EJCCCSE 083-2025), he has invented numerous OLED and "microoled"-related patented inventions; and he participated with Suzhou Cuisong in the 2021 Suzhou City "Silicon-based OLED Microdisplay Project"; and (v) the Respondent legally acquired the disputed domain name from Suzhou Cuisong.

The disputed domain name was not registered and is not being used in bad faith, for the following reasons (i) while the Complainant claims that the disputed domain name was acquired in 2020 during a period of rapid growth in the Complainant's business in China, it was acquired by Suzhou Cuisong in 2020 but not by the Respondent until 2023; (ii) the disputed domain name was and is held based on legitimate business needs, in the case of Suzhou Cuisong for brand promotion and online operation of its own "microoled" business and, in the case of the Respondent, based on his deep ties with the "microoled" industry and his future business plans. Neither had any subjective intent to speculate for profit or confuse the public; (iii) the Respondent never listed any domain name for sale on the broker's platform cited by the Complainant; that offer was unrelated to the Respondent; (iv) the asking price that the Respondent quoted to the Complainant was based on a reasonable assessment of market value, in particular, the rapid development of the microOLED industry and the significant increase in the commercial value of the disputed domain name, and was not in bad faith; and (v) the disputed domain name was actively used with a website after its acquisition by Suzhou Cuisong in 2020.

6. Discussion and Findings

6.1 Preliminary Issue: Language of the Proceeding

The language of the Registration Agreement for the disputed domain name is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint was filed in English and Chinese but the amended Complaint was filed in English only. The Complainant requested that the language of the proceeding be English for several reasons, including the fact that the Complainant has no reasonable means of acting in Chinese; and conducting the proceeding in Chinese would be excessively burdensome for it.

The Response was filed in Chinese but the Respondent's email communications with the Center were sent in English and Chinese. The Respondent initially agreed to English being the language of the proceeding but asked to submit the Response in Chinese with an English translation. Later, he requested that the language of the proceeding be Chinese for several reasons, including the fact that the Registration Agreement for the disputed domain name is in Chinese; if the Complainant has long conducted business in the Chinese market, it must possess the ability to participate in Chinese; the Complainant is represented by an international law firm; and the Respondent is a Chinese citizen and Chinese is his mother tongue.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time, and costs. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.5.1.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English, but that the Panel will accept the Response as filed in Chinese without translation.

6.2 Substantive Issues

Paragraph 4(a) of the Policy provides that a complainant must demonstrate each of the following elements:

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

The burden of proof of each element is borne by the Complainant.

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. See [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of a semi-figurative MICROOLED trademark for the purposes of the Policy. See [WIPO Overview 3.1](#), section 1.2.1. The Complainant also seeks to rely on its company name and its domain name but these name types, without evidence that they function as trademarks, do not satisfy the first element of the Policy.

The textual element of the mark (i.e., "MICROOLED") is reproduced within the disputed domain name. Given that the figurative elements of the mark cannot be represented in a domain name for technical reasons, the Panel will disregard them in the assessment of identity or confusing similarity for the purposes of the first element of the Policy, although they remain relevant to the assessment of bad faith for the purposes of the third element of the Policy. The only additional element in the disputed domain name is a gTLD extension (".com") which, as a standard requirement of domain name registration, may also be disregarded for the purposes of the first element of the Policy. Accordingly, the disputed domain name is identical to the mark for the purposes of the first element of the Policy. See [WIPO Overview 3.1](#), sections 1.7, 1.10, and 1.11.1.

The Respondent submits that "microOLED" lacks the distinctiveness required for trademark protection. However, this is the textual element of the Complainant's trademark, for which registrations are currently in force. The potential technical meaning of "microOLED" is taken into account in relation to bad faith under the third element of the Policy below.

Therefore, 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.

Although the overall burden of proof in UDRP proceedings is on the complainant, panels have recognized that proving that 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. 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 (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. See [WIPO Overview 3.1](#), section 2.1.

In the present case, the disputed domain name does not resolve to any active website; rather, it is passively held. This does not constitute a use of the disputed domain name in connection with a bona fide offering of goods or services, nor is it a legitimate noncommercial or fair use. Further, the Respondent's name is "祝晓钊 (zhu xiao zhao)" and his former company is named "苏州萃松光电有限公司 (Suzhou Cuisong Optoelectronics Co., Ltd)", neither of which resembles the disputed domain name. Nothing on the record indicates that the Respondent (whether as an individual, business, or organization) has been commonly known by the disputed domain name.

Having reviewed the available record, the Panel finds the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain name.

Turning to the Respondent, he alleges that the disputed domain name previously resolved to an active website. However, this allegation relates to circumstances in 2020, when the Respondent's former company was the registrant. In any case, there is no evidence that there ever was an active website associated with the disputed domain name. No archived screenshot is available. While there was an online chat conversation regarding a proposed website design, the conversation did not refer to the disputed domain name and it ended with confirmation that the website had not gone live. The evidence also shows that the disputed domain name was displayed on an old business card for the Respondent and in a list of resource requirements for a stand at a trade fair, together with another domain name used as a website address and for a contact email. At most, this evidence suggests that a website may have been proposed six years ago for use in connection with the disputed domain name, but it does not show any current preparations to use the disputed domain name in connection with an offering of goods or services.

The Respondent provides evidence of his experience in the field of display technology and alleges that he holds the disputed domain name for future business plans. However, he does not indicate what those future plans might be or demonstrate any preparations to use the disputed domain name in such a connection.

The Respondent also alleges that he legally acquired the disputed domain name from Suzhou Cuisong. However, mere registration of a domain name does not create rights or legitimate interests for the purposes of the Policy, otherwise no complaint under the Policy could ever succeed, which would be an illogical result.

In sum, the Panel does not find that the Respondent has rebutted the Complainant's prima facie case.

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

C. Registered and Used in Bad Faith

The Panel notes that the third element of paragraph 4(a) of the Policy contains two requirements that apply conjunctively. A complainant must show both that the disputed domain name has been registered in bad faith and also that it is being used in bad faith. The former requires a demonstration that the Respondent knew, or should have known, of the Complainant and/or the Complainant's trademark at the time when he acquired the disputed domain name and that he acquired the disputed domain name with a bad faith intention targeting the Complainant and/or its mark.

In the present case, the Panel notes that the disputed domain name was acquired by the Respondent's former company in 2020 and by the Respondent himself in 2023, both years after the registration of the Complainant's semi-figurative MICROOLED mark, including in China, where the Respondent is based. The disputed domain name wholly incorporates the textual element of that mark (i.e., "MICROOLED"), adding only a gTLD extension. The disputed domain name is also identical to the Complainant's domain name, except for the different gTLD extension.

The Complainant alleges that the disputed domain name was acquired by the Respondent at a time of strong growth of the Complainant's business in China. Yet the Complainant provides no evidence of its business in China. While the certificate of its total annual revenues shows a sharp increase in 2020, the certificate makes no reference to any country, only its French company registration number. Nevertheless, the Respondent does not deny awareness of the Complainant prior to this dispute. Given his considerable experience in the display industry, it is likely that he was aware of the Complainant when he and his former company acquired the disputed domain name. That inference finds some support in the Respondent's own evidence of a prospectus for a Chinese silicon-based OLED microdisplay manufacturer, issued in China no earlier than 2025, which presents MICROOLED (i.e., the Complainant) as a major global player in the microdisplay industry.

However, the Panel does not infer from the above circumstances that the Respondent had the Complainant or its mark in mind when he registered the disputed domain name. The Respondent provides evidence that "microOLED", with or without a hyphen or a space, is a combination of the prefix "micro" and the acronym "OLED" for "organic light-emitting diode" and that this combination refers to a very small, high-resolution

display technology. The evidence includes online articles from Panox Display, a Chinese manufacturer (“What is a Micro OLED Micro Display and How Does it Work?”); CNET, a tech website (“Micro-OLED, also known as OLEDoS and OLED microdisplays [are] tiny OLED ‘micro’ displays”); LEDInside, a lighting platform (“What are Micro LED, Mini LED, and Micro OLED? Different Emerging Display Technologies Explained”); and Display Daily, an industry professional website, listing “MicroOLED” among microdisplay technologies. The evidence also shows that a major display manufacturer for VR/AR headsets (BOE), and Apple, the developer of the Apple Vision Pro mixed reality headset, refer to “Micro OLED” or “a custom ‘micro-OLED’” display system, as a product component. These do not appear to be exclusive references to the Complainant’s products.

The Complainant points out that the disputed domain name uses the same specific spelling as its mark, including a double “o” highlighted in the mark. However, this is not necessarily an indication of targeting as it signals the semantic difference between “microOLED”, and “microLED”, a different technology that uses inorganic light-emitting diodes. Nothing on the record shows that the Respondent or his former company has ever used the figurative elements in the Complainant’s mark or made any other unambiguous reference to the Complainant.

The Complainant alleges that the Respondent is holding the disputed domain name for purely speculative purposes. Indeed, the Respondent has passively held the disputed domain name since he acquired it in 2023 and there is no dispute that in October 2025 he quoted a sale price for the disputed domain name. While he disputes whether he also offered the disputed domain name for sale on a broker’s website, he does not specify any other use to which he intends to put the disputed domain name besides holding it for resale.

Nevertheless, merely holding the disputed domain name for resale does not demonstrate that the Respondent is speculating based on the value of the Complainant’s trademark. The Respondent alleges that his asking price is based on the increasing market value of microOLED technology. He cites market research from 2025, one showing that global sales of silicon-based OLED displays grew rapidly from CNY 390 million (over EUR 47 million) in 2020 to CNY 1.27 billion (over EUR 153 million) in 2024 and projecting that they would reach CNY 67.93 billion (over EUR 8 billion) by 2030, and another predicting exponential growth in the OLED microdisplay market. The Respondent argues that this correlates to an increase in the value of the disputed domain name. On the other hand, the most recent evidence shows that the Complainant’s total annual revenues were over EUR 12 million in 2020. Based on the record, the Panel is not in a position to determine which was the more likely basis for the Respondent’s (or his former company’s) acquisition of the disputed domain name or his more recent asking price.

The Panel has taken note that the Respondent’s identity is hidden in the Registrar’s public Whois database but, without more, does not conclude that this is an indication of bad faith.

Accordingly, on the balance of probabilities, the evidence in the case file as presented does not indicate that the Respondent’s aim in registering the disputed domain name was to profit from or exploit the Complainant’s trademark.

Therefore, the Panel finds the third element of the Policy has not been established.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Matthew Kennedy/

Matthew Kennedy

Sole Panelist

Date: March 17, 2026