

ADMINISTRATIVE PANEL DECISION

Leon Max, Inc. v. tu he, niu youguo
Case No. D2026-0825

1. The Parties

The Complainant is Leon Max, Inc., United States of America ("United States"), represented by Fross Zelnick Lehrman & Zissu, PC, United States.

The Respondents are tu he, and niu youguo, United States.

2. The Domain Names and Registrar

The disputed domain names <maxstudiolondonsale.shop>, <maxstudiolondonus.shop>, <maxstudiosafe.shop>, <maxstudiousbst.shop> and <maxstudious.shop> are registered with Spaceship, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on February 25, 2026. On February 26, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On February 27, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint.

The Center sent an email communication to the Complainant on March 2, 2026 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrar, 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 are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on March 3, 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 Respondents of the Complaint, and the proceedings commenced on March 11, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 31, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondents' default on April 1, 2026.

The Center appointed Elizabeth Ann Morgan as the sole panelist in this matter on April 10, 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 California corporation. Complainant is the owner of the MAX STUDIO family of trademarks in the United States and in select countries around the world. Led by fashion designer Leon Max, the Complainant is a women's luxury fashion brand bringing classic styles to modern women. Founded in 1979, the Complainant's MAX STUDIO manufactures clothing of unwavering caliber using superior fabrics, yarns, and leather goods.

In addition to the Complainant's extensive and strong common law rights in the MAX STUDIO trademark developed through more than 40-years of use, the Complainant owns numerous U.S. trademark registrations for the MAX STUDIO trademark and related MAX STUDIO marks, including but not limited to the following:

Mark	Country	Class	Registration No.	Registration Date
MAX STUDIO	U.S.	25	1,358,151	September 3, 1985
MAX STUDIO	U.S.	25	6,053,854	May 12, 2020

The disputed domain names were registered between June 7, 2025 and September 22, 2025. As of the registration dates, the Complainant had been using the MAX STUDIO trademarks for decades and had secured trademark registrations for the MAX STUDIO trademarks in the United States and in jurisdictions around the world.

The disputed domain names resolve to virtually identical websites. The websites do not appear to use a standard or off-the-shelf template but are intended to create the impression of being actual websites of the Complainant, using the MAX STUDIO trademarks in the banner and heading at each site and in the name of the websites, all without authorization and purporting to offer MAX STUDIO items. Second, the language used on the sites associated with the disputed domain names appears to be almost identical. Further all websites hosted under disputed domain names list similarly false contact information.

The Complainant has not authorized the Respondents to use the MAX STUDIO trademark in a domain name, at any website, or for any other purpose. Further, there has never been any relationship between the Complainant and the Respondents that would give rise to any license, permission, or authorization for the Respondents to use or register the disputed domain names. Moreover, the Respondents are not and have never been an authorized seller, supplier, or manufacturer of any of the Complainant's products.

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 names.

Notably, the Complainant contends that it has rights in the MAX STUDIO trademarks; that the disputed domain names are identical or confusingly similar to the Complainant's MAX STUDIO trademarks; that the Respondents have no rights or legitimate interests in the disputed domain names; and that the disputed domain names were registered and are being used in bad faith.

B. Respondents

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

6. Discussion and Findings

Consolidation: Multiple Respondents

The Amended Complaint was filed in relation to nominally different domain name registrants. The Complainant alleges that the domain name registrants are the same entity or mere alter egos of each other, or under common control. The Complainant requests the consolidation of the Complaint against the multiple disputed domain name registrants pursuant to paragraph 10(e) of the Rules.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party. Given the similar appearance of the websites and the pattern of using the MAX STUDIO marks on websites that purport to offer MAX STUDIO branded products, and the fact that the registrants have similar addresses, the Panel exercises its discretion under paragraph 10(e) to consolidate multiple domain name disputes into a single proceeding.

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

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 names. WIPO Overview of WIPO Panel Views on Select UDRP Questions (["WIPO Overview 3.1"](#)), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The Panel finds the mark is recognizable within the disputed domain names. Accordingly, the disputed domain names are confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

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. [WIPO Overview 3.1](#), section 2.1.

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 names. The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any relevant evidence demonstrating rights or legitimate interests in the disputed domain names such as those enumerated in the Policy or otherwise.

Panels have held that the use of a domain name for illegitimate activity here, claimed copycat sites, passing off, or other types of fraud can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.1](#), section 2.13.1.

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.

In the present case, the Panel notes that the Respondent is using the disputed domain names to attract for commercial gain Internet users by creating a likelihood of confusion with the Complainant’s mark and to disrupt the Complainant’s business.

Panels have held that the use of a domain name for illegitimate activity here, claimed copycat sites, passing off or other types of fraud constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain names constitute bad faith under the Policy.

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 disputed domain names <maxstudiolondonsale.shop>, <maxstudiolondonus.shop>, <maxstudiosafe.shop>, <maxstudiousbst.shop>, and <maxstudious.shop> be transferred to the Complainant.

/Elizabeth Ann Morgan/
Elizabeth Ann Morgan
Sole Panelist
Date: April 17, 2026