

ADMINISTRATIVE PANEL DECISION

Instagram, LLC v. Le Tong, Minh Luong
Case No. D2026-1954

1. The Parties

The Complainant is Instagram, LLC, United States of America (“United States”), represented by Perkins Coie LLP, United States.

The Respondents are Le Tong and Minh Luong, Viet Nam.

2. The Domain Names and Registrars

The disputed domain names <savegram.app> and <savegram.info> are registered with Name.com, Inc. and Squarespace Domains II LLC respectively (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on May 5, 2026. On May 6, 2026, the Center transmitted by email to the Registrar requests for registrar verification in connection with the disputed domain names. On May 6, 2026, and May 8, 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, Domain Protection Services, Inc.) and contact information in the Complaint.

The Center sent an email communication to the Complainant on May 12, 2026, 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 are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amendment to the Complaint on May 14, 2026.

The Center verified that the Complaint together with the amendment to the 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 May 19, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 8, 2026. The Respondents did not submit any response. Accordingly, the Center notified the Respondent's default on June 9, 2026.

The Center appointed Torsten Bettinger as the sole panelist in this matter on June 15, 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 Delaware limited liability company with its principal place of business in California, United States.

The Complainant operates one of the world's leading online photo- and video-sharing social networking services under the trademark INSTAGRAM. The Complainant's services are offered primarily through its website at "www.instagram.com" and through mobile applications for iOS and Android devices.

The Complainant owns trademark rights in the marks INSTAGRAM, INSTA, IG and GRAM. These include, inter alia, the following trademark registrations:

- United States Trademark Registration No. 4,146,057 for INSTAGRAM, registered on May 22, 2012;
- International Trademark Registration No. 1129314 for INSTAGRAM, registered on March 15, 2012.
- Benelux Trademark Registration No. 0992903 for GRAM, registered on March 31, 2016.

The disputed domain names <savegram.app> and <savegram.info> were registered on January 6, 2023, and December 3, 2023, respectively.

The disputed domain names resolve to websites operating under the name "SaveGram", offering online tools enabling users to download photographs, videos, reels, stories and other content from the Complainant's Instagram platform.

The evidence submitted by the Complainant shows that the websites make extensive use of references to Instagram and its services and promote themselves as "Instagram downloaders". The websites also contain functionality allowing users to paste Instagram URLs in order to download content from the Instagram platform.

The website associated with the disputed domain name <savegram.info> uses a color gradient similar to that associated with the Complainant's Instagram platform.

Both websites display substantially similar layouts and content and use the same contact email address.

The Complainant sent cease-and-desist communications to the Respondent in 2024 and 2025, requesting that the Respondent cease its use of the Complainant's trademarks and transfer the disputed domain names. The Respondent did not reply to the Complainant's communications.

5. Parties' Contentions

A. Complainant

The Complainant requests consolidation of the disputed domain names, arguing that they are subject to common control or form part of a common scheme.

The Complainant submits that both disputed domain names target the same GRAM trademark and follow the same naming pattern, consisting of the term “save” followed by “gram”. The Complainant further relies on the fact that both disputed domain names are used for substantially similar websites offering Instagram content downloading tools, that both websites use the same “SaveGram” designation, that both are in English, and that both use the same contact email address on the websites.

The Complainant further submits that both websites show indicators of common control. In particular, the Complainant relies on the use of the same contact email address on both Contact pages and on substantially similar Terms of Service.

The Complainant contends that the Terms of Service for <savegram.info> appear to have been copied and mechanically adapted from those used for <savegram.app>, resulting in corrupted wording.

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

With regard to the requirement of identity or confusing similarity between the Complainant’s trademarks and the disputed domain names pursuant to paragraph 4(a)(i) of the Policy, the Complainant contends that

- the disputed domain names incorporate the Complainant’s GRAM trademark in its entirety;
- the disputed domain names also evoke the Complainant’s well-known INSTAGRAM trademark, since “gram” is widely recognized by consumers as referring to Instagram;
- the addition of the descriptive term “save” does not prevent a finding of confusing similarity; and
- the applicable Top-Level Domains “.app” and “.info” should be disregarded for the purposes of the confusing similarity analysis.

With regard to the Respondent having no rights or legitimate interests in the disputed domain names, the Complainant submits that

- the Respondent has no relationship with the Complainant;
- the Complainant has never authorized, licensed or otherwise permitted the Respondent to use the Complainant’s INSTAGRAM, INSTA, or GRAM trademarks or to register domain names incorporating those marks;
- the Respondent is not commonly known by the disputed domain names;
- the disputed domain names are used in connection with websites offering tools for downloading content from the Complainant’s Instagram platform;
- the Respondent’s websites prominently refer to Instagram and make use of the Complainant’s trademarks in connection with the offered services;
- the Respondent’s use is neither a bona fide offering of goods or services nor a legitimate noncommercial or fair use; and
- the Respondent intentionally seeks to create the impression that its services are associated with, endorsed by or otherwise connected with the Complainant.

Finally, with regard to the disputed domain names having been registered and being used in bad faith, the Complainant argues that

- the Complainant’s trademark rights substantially predate the registration of the disputed domain names;
- the Respondent was aware of the Complainant and its INSTAGRAM and GRAM trademarks when registering the disputed domain names;
- the disputed domain names were deliberately chosen because they combine the Complainant’s GRAM trademark with the descriptive term “save”, directly referring to the services offered on the associated websites;
- the Respondent uses the disputed domain names for commercial websites offering tools specifically designed for downloading content from the Complainant’s Instagram platform;

- the Respondent intentionally attempts to attract Internet users for commercial gain by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of the Respondent's websites and services;
- the Respondent's registration and use of the disputed domain names fall within paragraph 4(b)(iv) of the Policy; and

B. Respondent

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

6. Discussion and Findings

A. 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.

The disputed domain name registrants did not comment on the Complainant's request.

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 Select UDRP Questions (["WIPO Overview 3.1"](#)), section 4.11.2.

As regards common control, the Panel notes that both disputed domain names follow the same naming pattern, consisting of the term "save" followed by the Complainant's GRAM trademark. Both disputed domain names resolve to websites operating under the same "SaveGram" name and offering substantially the same type of service, namely tools for downloading content from the Complainant's Instagram platform.

The Complainant has also submitted evidence that both websites use the same contact email address, on their respective Contact pages.

In addition, the Complainant has pointed to substantially similar Terms of Service on the two websites, including apparent automatic replacement of "app" with "info" in the Terms of Service for <savegram.info>, resulting in corrupted wording such as "Infolicable law" and "Materials infoearing".

The Panel further notes that both disputed domain names target the same Complainant and the same trademark, are written in English and ASCII characters, use the same "SaveGram" designation, and point to substantially similar website content and layout.

In these circumstances, the Panel finds, on the balance of probabilities, that the disputed domain names and the corresponding websites are subject to common control.

As regards fairness and equity, the Panel sees no reason why consolidation of the disputes would be unfair or inequitable to any Party.

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.

B. 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 trademarks and the disputed domain names. [WIPO Overview 3.1](#), section 1.7.

The Complainant has shown rights in respect of the INSTAGRAM and GRAM trademarks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The disputed domain names consist of the term "savegram" followed by the Top-Level Domains ".app" and ".info".

The disputed domain names incorporate the Complainant's GRAM trademark in its entirety. The GRAM mark is clearly recognizable within each of the disputed domain names.

The Panel further notes that the term "gram" is closely associated with the Complainant's well-known INSTAGRAM trademark and platform. In the circumstances of this case, Internet users are likely to perceive the term "gram" in the disputed domain names as referring to the Complainant and its INSTAGRAM services.

The addition of the descriptive term "save" does not prevent a finding of confusing similarity.

The Top-Level Domains ".app" and ".info" are standard registration requirements and are disregarded under the first element confusing similarity analysis.

Accordingly, the Panel finds that the disputed domain names are confusingly similar to the Complainant's GRAM trademark. The close association between the term "gram" and the Complainant's well-known INSTAGRAM mark further reinforces this conclusion.

Accordingly, the Panel finds that the first element of the Policy has been established.

C. 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 that the Complainant has established a prima facie case that the Respondent lacks rights or legitimate interests in the disputed domain names.

The Complainant has not authorized, licensed, or otherwise permitted the Respondent to use its GRAM trademark. There is no evidence on the record that the Respondent is affiliated with the Complainant or has been commonly known by the disputed domain names.

The disputed domain names incorporate the Complainant's GRAM trademark in its entirety together with the term "save". In the context of the Respondent's use of the disputed domain names for websites offering

tools to download content from the Complainant's Instagram platform, the disputed domain names carry a clear risk of implied affiliation.

The evidence shows that the disputed domain names resolve to websites operating under the name "SaveGram" and offering services described as Instagram content downloaders. The websites make repeated references to Instagram and to Instagram content, including photos, videos, reels, and stories. Such use of domain names confusingly similar to the Complainant's trademark to operate websites that give the impression of being connected with, endorsed by, or authorized by the Complainant does not constitute a bona fide offering of goods or services under the Policy.

Nor does the Panel find any evidence of legitimate noncommercial or fair use. The Respondent's websites are commercial in nature and appear intended to capitalize on the reputation and goodwill of the Complainant's GRAM trademark and Instagram platform.

The Respondent has not submitted any response and has not come forward with any evidence of rights or legitimate interests in the disputed domain names.

Accordingly, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain names within the meaning of paragraph 4(a)(ii) of the Policy.

D. 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 finds that the disputed domain names were registered in bad faith. The Complainant's GRAM trademark rights predate the registration of the disputed domain names. The Complainant has also shown that its Instagram platform was widely known before the Respondent registered the disputed domain names.

The disputed domain names incorporate the Complainant's GRAM trademark in its entirety together with the term "save". The Respondent's websites expressly refer to Instagram and offer tools for downloading content from the Complainant's Instagram platform.

In these circumstances, the Panel finds it implausible that the Respondent selected the disputed domain names independently or without knowledge of the Complainant and its GRAM trademark.

The Respondent's use of the disputed domain names for websites targeting the Complainant's Instagram platform and services further supports the conclusion that the Respondent registered the disputed domain names with the Complainant and its trademark in mind.

Accordingly, the Panel finds that the disputed domain names were registered in bad faith.

The evidence further shows that the disputed domain names have been used to resolve to websites operating under the name "SaveGram" and offering tools for downloading Instagram content, including photos, videos, reels and stories.

The Respondents' websites give the impression that they are connected with, affiliated with, or authorized by the Complainant. They use the term "SaveGram", refer repeatedly to Instagram, and offers services specifically directed at users of the Complainant's Instagram platform.

In the Panel's view, the Respondent's use of the disputed domain names to attract Internet users to websites offering Instagram-related downloading services by creating a likelihood of confusion with the Complainant's GRAM trademark as to source, sponsorship, affiliation, or endorsement constitutes bad faith use under

paragraph 4(b)(iv) of the Policy.

The Panel further considers that the Respondent's use of substantially similar websites, the same "SaveGram" designation, the same contact email address, and similar Terms of Service reinforces the finding that the Respondent intentionally sought to exploit the goodwill associated with the Complainant's mark and platform.

The Respondent has not filed any response and has not provided any plausible explanation for its registration or use of the disputed domain names.

Accordingly, the Panel finds that the disputed domain names have been registered and are being used in bad faith within the meaning of paragraph 4(a)(iii) 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 <savegram.app> and <savegram.info> be transferred to the Complainant.

/Torsten Bettinger/

Torsten Bettinger

Sole Panelist

Date: June 29, 2029