ADMINISTRATIVE PANEL DECISION

Social Plus Holdings Ltd v. Anders Hansen
Case No. D2026-2256

1. The Parties

The Complainant is Social Plus Holdings Ltd, United Kingdom, internally represented.

The Respondent is Anders Hansen, Denmark.

2. The Domain Names and Registrar

The disputed domain names <socialplus.co> and <socialplus.com> are registered with NameCheap, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on May 26, 2026. On June 1, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain names. On June 2, 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 (Adam Moore) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 4, 2026, 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 June 5, 2026 and a corrected version of the Complaint on June 9, 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 Respondent of the Complaint, and the proceedings commenced on June 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was June 30, 2026. The Response was filed with the Center on June 29, 2026. An earlier email from the Respondent acknowledging receipt of the Complaint having been received by the Center on June 5, 2026. On June 30, 2026, the Complainant submitted a Supplemental Filing. On July 2, 2026, the Respondent submitted an email communication in reply to the Complainant's Supplemental Filing.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on July 8, 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.

On July 22, 2026, the Panel issued Administrative Panel Order No 1 pursuant to paragraphs 10 and 12 of the Rules inviting the Complainant to clarify certain matters in the Amended Complainant and supplemental filing and also affording the Respondent an opportunity to respond, as the Respondent had requested.

On July 27, 2026, the Complainant submitted its second supplemental filing. On August 4, 2026, the Respondent submitted its supplemental filing pursuant to the Administrative Panel Order No 1.

4. Factual Background

The Complainant is a company based in the United Kingdom which trades as “Social Plus” and “Social +”. It provides ready-to-use social infrastructure. The infrastructure includes software development kits (SDKs), application programming interfaces (APIs) and SaaS-based in app community platform services such as live streaming infrastructure and social engagement tools for mobile and web applications.

It does so from the website at “www.social.plus”.

According to the Complaint, the Complainant’s platform has more than 100 end-users per month and serves “hundreds” of global enterprise clients. These clients include Airbnb, Harley-Davidson, and Ulta Beauty. Also, according to the Complaint, the Complainant’s services generate approximately USD 8 million in annual revenues.

The Complainant’s business started in 2020 or 2021. The Complainant was initially named and carried on its business under the name “Amity”. It changed its name and adopted the “Social Plus” /”Social +” branding, however, in October 2024.

The Complainant has a pending Trademark Application in the United States of America which has been published for opposition on July 14, 2026, Serial Number 99614891. The mark is:

social.plus

The trademark has been published for opposition with a disclaimer of “Social+”.

The Respondent is the sole director and shareholder in Webigo Marketing ApS, a Danish company. This company was registered on March 27, 2019. From 2020, the Respondent has been running a social networking platform at “www.muy.dk” for Danish speakers. At an impressionistic level, this appears to be similar to Facebook in that users can post news, comments, photographs and videos and comment on each other’s posts.

On May 20, 2019, the Respondent registered the domain name <socialplus.live>.

On February 27, 2021, the Respondent became the registrant by transfer of the domain name <socialplus.net>.

On December 16, 2021, the Respondent became the registrant by transfer of the disputed domain name <socialplus.co>.

On February 2, 2022, the Respondent became the registrant of the disputed domain name <socialplus.com>.

On September 20, 2020, the website at “www.socialplus.live” provided what it called a “boost” services. Under the heading, “Stand out in the crowd”, this service was described as service to buy followers for Instagram and YouTube accounts.

From about April 21, 2021, this domain name redirected to the website at “www.sociplus.net” which also advertised its services as “Boost your Presence on Instagram & YouTube”. After referring to the team’s long experience with ranking content and growing an audience, the website appears to have offered services in buying followers and engagement.

Prior to 2026, the two disputed domain names also resolved to the website at “www.socialplus.net”.

On January 6, 2026, the Respondent through an agent contacted the Complainant and invited it to “feel free to reach out” if it was interested in securing the “premium domains: SocialPlus.com, .co and .net.”

On February 5, 2026, the Respondent made a further contact offering a “time-sensitive strategic opportunity” to acquire the disputed domain names and <socialplus.net>. In the meantime, it appears from website logs that the Respondent spent over one hour in 15 separate browsing sessions visiting pages on the Complainant’s website.

Between February 12 and 19, 2026, there were some Instagram message exchanges between the Respondent’s representative and the CEO and Co-founder of the Complainant. In this exchange, amongst other things, the Complainant’s CEO rejected the “long term opportunity” being offered, stating “Thanks, [****], but we are very happy with social.plus”. The Respondent’s representative replied:

“Totally fair – and you’ve built strong equity around it.”

On March 17, 2026, the disputed domain name <socialplus.com> resolved to a website which offered a “Premium Brand Asset Opportunity” and “Social+ *Own the Namespace”. The website then provided a contact form for inquiries to “Explore Full Ownership of the core Social+ namespace”. That is, the website sought offers for the purchase of the two disputed domain names and the domain name <socialplus.net>.

The disputed domain name <socialplus.co> continued to redirect to the website at “www.socialplus.net”.

On March 22, however, the disputed domain name <socialplus.com> began resolving to a website which promoted “one enterprise social SDK to build native in-app communities, live rooms, shared feeds and real-time engagement. ….” which the Complainant describes as a direct replication of the Complainant’s core product offering.

5. Discussion and Findings

Paragraph 4(a) of the Policy provides that in order to divest the Respondent of a disputed domain name, the Complainant must demonstrate each of the following:

(i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights;

(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.

Paragraph 15(a) of the Rules directs the Panel to decide the Complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable.

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 Select UDRP Questions ("WIPO Overview 3.1"), section 1.7.

The Complainant does not claim to own any registered trademarks for SOCIAL PLUS but relies instead on claimed common law rights in that expression arising from use.

The Respondent disputes that the Complainant does have such rights. The Respondent contends that term is descriptive of social and community features added, or to be added, to websites to promote social engagement. The Respondent also points to the voluntary disclaimer of the term in the Complainant's United States trademark application and notes that the Complainant has been using SOCIAL.PLUS only since October 2024.

While the Complainant contends that it has been conducting its underlying business since at least 2021, that does not confer rights in the term SOCIAL.PLUS since then. Such rights, if they arise, do so only from use and promotion generating reputation and secondary meaning.

The Panel accepts, on the evidence before it, that "social plus" or "social +" does have a descriptive meaning.

The Panel also finds that the Complainant has been using the expression only since October 2024.

While the period of use before the Complaint was filed is comparatively short, however, it has been use on a very large and wide scale so that the Panel considers amongst businesses looking for the sorts of services the Complainant offers SOCIAL.PLUS has likely acquired recognition and reputation as an unregistered trademark signifying the Complainant's services.

That conclusion is reinforced by the Respondent's representative's acknowledgement in the exchange on February 19, 2026 that the Complainant had established "strong equity" in SOCIAL.PLUS.

Given that finding, and the usual practice of disregarding the generic Top-Level Domain (gTLD) and the country code Top-Level Domain (ccTLD) components of the disputed domain names as functional aspects of the domain name system (WIPO Overview 3.1, section 1.11), the Panel finds that the disputed domain names are both identical to the Complainant's trademark rights.

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

B. Registered and Used in Bad Faith

In the circumstances of this case, it is appropriate to consider next the third requirement under the Policy.

Under the third requirement of the Policy, the Complainant must establish that the disputed domain names have been both registered and used in bad faith by the Respondent. These are conjunctive requirements; both must be satisfied for a successful complaint: see e.g., *Group One Holdings Pte Ltd v. Steven Hafto* WIPO Case No. D2017-0183.

Generally speaking, a finding that a domain name has been registered and is being used in bad faith requires an inference to be drawn that the respondent in question has registered and is using the disputed domain name to take advantage of its significance as a trademark owned by (usually) the complainant.

In the present case, however, it is not possible to find that either disputed domain name was registered in bad faith. The disputed domain names were both registered by the Respondent several years before the Complainant adopted SOCIAL.PLUS as its name and trademark in October 2024. It will be recalled that the Respondent became the registrant of the disputed domain names on, respectively, December 16, 2021 and February 2, 2022. Further, there is no evidence before the Panel which would support a finding that, at those dates, the Respondent had notice of the Complainant's plans to rebrand from Amity to SOCIAL.PLUS. In these circumstances, therefore, there is no basis to make finding that the Respondent registered the disputed domain names in anticipation of the Complainant's trademark rights. WIPO Overview 3.1, section 3.8.1.

Since the Complainant has not established the Respondent registered the disputed domain names in bad faith, the Complainant cannot establish the third requirement under the Policy. Accordingly, the Complaint must fail.

C. Rights or Legitimate Interests

As the Complaint must fail, no useful purpose would be served by addressing the second requirement under the Policy.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. WIPO Overview 3.1, section 4.16.

The Panel is not prepared to make a finding of reverse domain name hijacking in this case.

Such a finding is a discretionary matter. For a party to obtain the benefits of such a finding, it must act in good faith or as equity lawyers say, it must seek equity with clean hands. The way the Respondent has used the disputed domain names, particularly <socialplus.com>, since January this year falls well short of that standard. Whatever may be said of the Respondent's business supplying followers and engagement to "boost" a website's prominence, the move into providing services which appear to be the same as those already being supplied by the Complainant under the same trademark seems calculated to cause confusion and is another matter. If it were not for the strict limitation of the Policy to requiring both registration and use in bad faith, it is very likely that the Complaint would not have failed. As noted above, however, in view of the failure to prove registration in bad faith, it is not necessary nor appropriate to make a finding about the requirement of use in bad faith.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Warwick A. Rothnie/
Warwick A. Rothnie
Sole Panelist
Date: August 12, 2026