

ADMINISTRATIVE PANEL DECISION

Sealed Air Corporation (US) v. he jxing
Case No. D2026-3165

1. The Parties

The Complainant is Sealed Air Corporation (US), United States of America ("United States" or "US"), represented by Nelson Mullins Riley & Scarborough, LLP, United States.

The Respondent is he jxing, China.

2. The Domain Name and Registrar

The disputed domain name <sealedairus.com> is registered with Dynadot Inc (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 17, 2026. On July 20, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 21, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Super Privacy Service LTD c/o Dynadot / Dynadot Dynadot Privacy Service) and contact information in the Complaint. The Center sent an email communication to the Complainant on July 22, 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 amended Complaints on July 22 and 27, 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 July 28, 2026. In accordance with the Rules, paragraph 5, the due date for Response was August 17, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on August 27, 2026.

The Center appointed Anna Carabelli as the sole panelist in this matter on September 2, 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

As per the evidence provided with the Complaint, the Complainant, a US corporation headquartered in North Carolina, is in the business of packaging solutions and equipment for food safety and security and product protection. The Complainant operates under the SEALED AIR brand in the United States and in 45 other countries worldwide through various subsidiary corporations and an extensive sales and distribution network. The Complainant's products, services and activities are also promoted and advertised online, through the Complainant's official website at <sealedair.com>.

The Complainant is the owner of trademark registrations for SEALED AIR, including the following:

- United States Registration No. 925,912 for SEALED AIR (word) registered December 21, 1971, with a date of first use in 1963, in international class 16;
- United States Registration No. 1,580,890 for SEALED AIR (word) registered February 6, 1990, in international classes 1, 3, 7, 10, 11, 16, 17, 20, 22, 35 and 37;
- United States Registration No. 2,534,715 for SEALED AIR (word) registered January 29, 2002, in international class 17;
- United States Registration No. 5,807,074 for SEALED AIR (word) registered July 16, 2019, in international class 7.

The disputed domain name was registered on May 8, 2026. It resolves to an active website that prominently features the Complainant's SEALED AIR trademark and includes the following copyright notice: "© 2026 Sealed Air. All Rights Reserved". The website at the disputed domain name promotes and offers packaging products, equipment and services that are identical to or otherwise related to those of the Complainant.

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:

As a result of its extensive and continuous use dating back at least to 1963, the Complainant's SEALED AIR mark enjoys significant reputation and is well-known in its field of activity, as recognized in previous UDRP decisions. The Complainant's earliest registration for the SEALED AIR trademark is dated December 21, 1971, but the Complainant claims to have acquired common law rights in the SEALED AIR trademark dating back to at least 1963. In addition, three of the trademark registrations listed above (No. 925,912, No. 1,580,890 and No. 2,534,715) have acquired "incontestable" status under US trademark law;

- the disputed domain name is confusingly similar to the trademark SEALED AIR in which the Complainant has rights. The disputed domain name incorporates the Complainant's trademark in its entirety. The addition of the suffix "us" (which is the recognized abbreviation for the United States -US) only increases the likelihood of confusion since the Complainant is based in the US;
- the Respondent has no rights or legitimate interests in the disputed domain name. In this regard the Complainant contends that: (i) the Complainant has not authorized or somehow given consent to the Respondent to register and use the disputed domain name; (ii) the Respondent is not commonly known by the disputed domain name; and (iii) the Respondent's use of the disputed domain name is neither a bona

fide offering of goods or services nor a legitimate noncommercial or fair use. Rather, it constitutes misappropriation of the Complainant's trademark and misleads consumers by creating a false impression of an association with the Complainant.

- the disputed domain name was registered and is being used in bad faith for the purpose of passing off/impersonating the Complainant, in an attempt to attract for commercial gain Internet users to the Respondent's website by creating a likelihood of confusion with the Complainant. The Complainant further contends that the Respondent's website embeds a submission form on the "Contact us" page, that is ostensibly intended to allow visitors to submit support requests regarding their specific needs, but that could be used by the Respondent to collect information about those visitors. The foregoing suggests an attempt by the Respondent to use the disputed domain name for fraudulent purposes.

Based on the above the Complainant requests the disputed domain name be transferred to the Complainant.

B. Respondent

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

6. Discussion and Findings

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

Under paragraph 4(a) of the Policy, the Complainant must prove 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 4(b) of the Policy sets out four illustrative circumstances, which for the purposes of paragraph 4(a)(iii) of the Policy, shall be evidence of registration and use of a domain name in bad faith.

Paragraph 4(c) of the Policy sets out three illustrative circumstances any one of which, if found by the Panel, shall be evidence of the Respondent's rights to or legitimate interests in a disputed domain name for the purposes of paragraph 4(a)(ii) of the Policy above.

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 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 entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of other terms, here the suffix "us" which is generally intended as the geographical abbreviation for "United States", may bear on assessment of the second and third elements, the Panel finds

the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

The addition of the Top-Level Domain, such as “.com”, is viewed as a standard registration requirement and as such is typically disregarded under the first element confusing similarity test. [WIPO Overview 3.1](#), section 1.11.1.

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 name. 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 name such as those enumerated in the Policy or otherwise.

The composition of the disputed domain name (comprising the Complainant’s SEALED AIR mark in its entirety) creates a risk of confusion and implied affiliation with the Complainant. [WIPO Overview 3.1](#), section 2.5.1.

Further, the disputed domain name is being used for a website which prominently features the Complainant’s SEALED AIR mark and offers and promotes products, equipment and services that are identical or related to those of the Complainant. In addition, the Respondent’s website includes the copyright notice: “© 2026 Sealed Air. All Rights Reserved”, which suggests an intention to impersonate the Complainant.

Such use does not constitute a bona fide offering of goods or services or a legitimate non-commercial or fair use and therefore does not give rise to rights and legitimate interests of the Respondent in the disputed domain name.

Panels have held that the use of a domain name for illegal activity like passing off/impersonation, 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 Complainant's SEALED AIR mark had been globally used and registered well before the Respondent registered the disputed domain name incorporating the Complainant's trademark. Also, a trademark register search, or even a simple online search prior to the registration of the disputed domain name would have informed the Respondent of the existence of the SEALED AIR trademark and the Complainant's extensive use of such trademark as a source identifier.

On the balance of probabilities, and in the absence of any evidence to the contrary, the Panel concludes that the Respondent set out to target the Complainant's mark and to deceive users by adopting a confusingly similar domain name, with an intention to divert Internet users to its website for either commercial and illicit purposes, by creating a likelihood of confusion with the Complainant's mark as to the source, sponsorship, affiliation, or endorsement of its websites. This is evidence of bad faith under paragraph 4(b)(iv) of the Policy.

The composition of the disputed domain name (comprising the Complainant's SEALED AIR mark in its entirety) reveals the Respondent's intent to create and take advantage of the initial confusion to drive Internet users to its own website. Furthermore, the content of the Respondent's website (i.e.: the prominent display of the Complainant's trademark, the misleading copyright notice, and the nature of the products and services offered) indicates the Respondent's intent to pass itself off/impersonate the Complainant.

Panels have held that the use of a domain name for illegal activity here, claimed as passing off/impersonation, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4.

Having reviewed the available record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes 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 name <sealedairus.com> be transferred to the Complainant.

/Anna Carabelli/

Anna Carabelli

Sole Panelist

Date: September 16, 2026