

ADMINISTRATIVE PANEL DECISION

Baidu Online Network Technology (Beijing) Co., Ltd. v. Forgetmyface / 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (Wubi)
Case No. DAI2023-0050

1. The Parties

The Complainant is Baidu Online Network Technology (Beijing) Co., Ltd., China, represented by Thomsen Trampedach GmbH, Denmark.

The Respondents are Forgetmyface / 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi), both of China, self-represented.

2. The Domain Name and Registrar

The disputed domain name <baidu.ai> is registered with Zenaida.cate.ai (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 1, 2023. On December 4, 2023, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name, and follow-up emails on December 12, and December 14, 2023. On December 15, 2023, the Registrar transmitted by email to the Center its verification response confirming that the Respondent (Forgetmyface) is listed as the registrant and providing the contact email address. The Registrar also confirmed that the language of the Registration Agreement for the disputed domain name is English.

The Center verified that 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 Respondents of the Complaint, and the proceedings commenced on December 20, 2023. In accordance with the Rules, paragraph 5, the due date for Response was January 9, 2024. The Respondents did not submit any response by the due date. Accordingly, the Center notified the Respondents’ default on January 11, 2024.

On January 14, January 16, January 18, January 21, and January 24, 2024, the Center received email communications from 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi). On January 19, 2024, the Complainant filed an amendment to the Complaint.

The Center appointed Matthew Kennedy as the sole panelist in this matter on January 25, 2024. 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, a subsidiary of Baidu, Inc., is an Internet company. It operates the Baidu search engine, which is China's most popular Internet search engine. The Complainant's other products include Baidu Maps, Baidu Image Search, Baidu Video Search and Baidu News Search. The Complainant group has engaged in extensive research and development in artificial intelligence ("AI") since 2009. For example, it has operated the Silicon Valley AI Lab, the Beijing Deep Learning Lab (formerly known as the Institute of Deep Learning), and the Beijing Big Data Lab since 2014 or earlier. Baidu was recognized as one of the four giants in the field of deep learning by Fortune magazine in 2016. The Complainant holds multiple trademark registrations, including the following:

- Chinese trademark registration number 1579950 for 百度 (which may be transliterated as "Baidu"), registered on May 28, 2001, specifying services in class 42; and
- International trademark registration number 1064506 for BAIDU in a particular style, registered on January 4, 2011, specifying services in classes 38 and 42.

The above trademark registrations are current. The Complainant uses the domain name <baidu.com> (registered on October 11, 1999) in connection with its Internet search engine. During the period from January 2015 to December 2017, the Complainant registered "baidu" in over 100 generic Top-Level Domains ("gTLDs").

The Respondents' identity is discussed in section 6.1A *infra*. According to the evidence presented by the Respondents, the disputed domain name was purchased by Junqiang Sheng on May 27, 2017 for USD 12,000. On June 23, 2017, the Complainant's representative sent an email to the Respondent's contact email address enquiring about a possible transfer of the disputed domain name and the price. On July 5, 2017, 盛军强 (Junqiang Sheng) and 吴比 (WuBi) established a Chinese company named "重庆拜读科技有限公司" (which may be transcribed and translated as "Chongqing Baidu Technology Co., Ltd"). In the company name, the characters for "Baidu" were those in the website title. 吴比 (WuBi) was the company's initial legal representative. On July 8, 2017, a reply was sent from the Respondent's contact email address declining the Complainant's offer. On July 10, 2017, Junqiang Sheng authorized the company to use the disputed domain name while he retained ownership and the right to sell it. According to an archived screenshot presented in evidence, by September 9, 2017, the disputed domain name resolved to a webpage titled "拜读" (which may be transliterated as "Baidu", meaning "read with respect"). The title appeared above the capitalized disputed domain name "BAIDU.AI". The content consisted of a classical Chinese poem. A disclaimer appeared in small print at the bottom of the webpage in Chinese "注: 本站是拜读科技旗下的网站, 与百度无关, 请勿混淆!" that could be translated as "Note: This site is a non-profit website belonging to Baidu Technology, and has nothing to do with Baidu, please do not be confused!" In this note, the second instance of "Baidu" was written "百度", as in the Complainant's name. The disputed domain name continued to resolve to the poem website for some time after that. Chongqing Baidu Technology Co., Ltd was deregistered on January 10, 2019.

In the Registrar's Whois database, the creation date for the disputed domain name is shown as December 15, 2017 but this date may not be correct.¹ In the present case, the Respondent evidently purchased and had control over the disputed domain name well before this date.

¹ The Panel notes that there was a technical migration of domain names within the ".ai" country code Top-Level Domain ("ccTLD") registry to a system using the Extensible Provisioning Protocol ("EPP"). As a result, the registration date for a particular domain name in the ".ai" ccTLD, reflected in Whois records around December 16, 2017, may not be accurate. See paragraph 26 of the EPP FAQ Terms and Conditions for the ".ai" ccTLD, found at "whois.ai/eppfaq.html".

According to archived screenshots provided by the Complainant, since at least August 2019 the disputed domain name has resolved to a webpage on a domain name broker's website where it is offered for sale. As of August 3, 2019, the seller's asking price was USD 50,000. As at September 12, 2023, the seller's asking price was USD 29,999.

On November 27, 2023, the Complainant's representative sent the Respondent a cease-and-desist letter.

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 identical to its BAIDU mark. The Respondents have no rights or legitimate interests in respect of the disputed domain name. The Respondents are not a licensee of the Complainant, nor have they otherwise been allowed to use the Complainant's "百度" and BAIDU trademarks, in a domain name or otherwise. The disputed domain name was registered and is being used in bad faith. The Complainant's "百度" and BAIDU trademarks are highly distinctive and famous in the world and have been continuously and extensively used since 2000 in connection with the Complainant's search engine network as well as other Internet-related services. The Respondents' conduct in attempting to sell the disputed domain name for USD 50,000 then USD 29,999 is evidence of use in bad faith.

B. Respondents

The Respondents contend that the Complainant has not satisfied the elements required under the Policy for a transfer of the disputed domain name.

The Respondents legally purchased the disputed domain name in 2017 for the business of their company with the same name, *i.e.*, "重庆拜读科技有限公司" (which may be transcribed and translated as "Chongqing Baidu Technology Co., Ltd"), which was established in 2017. The company name includes the characters "拜读" (which may be transcribed "baidu"), meaning "read respectfully". They chose this company name because they love reading. They chose the disputed domain name because it matches the company name. They paid USD 12,000 plus USD 50 tax for it. The suffix ".ai" means "love" in Chinese transliteration, so the full meaning of the disputed domain name can be "read.love".

Chongqing Baidu Technology Co., Ltd, was mainly engaged in online education-related business, and had nothing to do with the Complainant's business. The website associated with the disputed domain name was a non-profit online ancient poetry reading website from September 2017 to July 2019. The Respondents have never done anything to harm the Complainant's interests. The website indicated that it was non-profit and used bold red letters to indicate that it had nothing to do with the Complainant. The Respondents' company had other businesses, such as the 乐题云 ("Love Questions Cloud") website and the 小草芽 ("Small Grass") essay website, which are also common education training websites. These sites were closed due to poor management. The company was later transferred to 吴比 (WuBi)'s mother and eventually closed after about two years. During this proceeding, the Respondents reverted the website associated with the disputed domain name to the way it was before, to show what it was like.

In China, "baidu" is a common two-character transcription that corresponds to many common words, such as "拜读" (meaning "read respectfully"), "百毒" (hundred poisons) and "摆渡" (ferry). The Respondents' company name comes from a common word, which first appeared in the "Travels of Lao Can" (around 1907). The Complainant's Chinese name ("百度") is not original either but comes from the classical Chinese poem, 《青玉案·元夕》 (Melody of Green Jadeite Bowl - On the first night of a new year). The Complainant cannot restrict others from using the Chinese word "百度", or the phonetic transcription "Baidu", just as Apple, Inc. cannot restrict others from eating apples.

The Respondents never tried to sell the disputed domain name to the Complainant. Someone sent them an email seeking to buy the disputed domain name, which they refused immediately without stating any price. The Respondents have been trying to sell the disputed domain name in recent years for the following reasons: (i) since the new Chinese rule called double-minus was published to ban K12 online education and training, it was difficult for the Respondents' company to make money, so they closed the company and there was no need to maintain this website; (ii) the disputed domain name was legally purchased for the Respondents' company and after the company closed, the Respondents have the right to sell it; (iii) the Respondents bought the disputed domain name for USD 12,050 (tax included) and are trying to sell it for USD 29,999, which is not a high price in the domain industry after six years. Purchasers can make an offer on the brokers' website so the final price may be lower. The asking price is about double the initial purchase price, which is not outrageous in the domain industry, and is low compared to the price increase of Bitcoin, and even less than the rate of house price increases in China; (iv) the Respondents' website received few visitors, the Respondents did not have time to maintain it, and the cloud server costs a lot and is time-consuming; (v) the Respondents need to recover the money paid for the disputed domain name to raise their families; (vi) the Respondents do not sell domain names for a living and their annual tax bill is more than the cost price of the disputed domain name. It is incomprehensible that the Complainant, a famous large company, wants to rob them of the disputed domain name, that they legally purchased, for free.

Although "ai" can mean "artificial intelligence", the Respondent asserts that the .ai domain suffix is actually a regional domain name type for Anguilla, a small island with only more than 10,000 people, I doubt whether the complainant has a business or trademark on the island.

6. Discussion and Findings

6.1 Preliminary Issues

A. Identity of the Respondent

Paragraph 1 of the Rules defines the respondent as "the holder of a domain name registration against which a complaint is initiated".

The Registrar verified on December 15, 2023, that the holder of the disputed domain name registration was listed at that time as "Forgetmyface". This was also the username in the registrant's contact email address. According to evidence provided from that contact email address, the Registrar's Whois record now shows that the holders of the disputed domain name are "Johnny Sheng & WuBi". The registrant's contact email address remained the same.

In their email communication of January 18, 2024, sent from the registrant's contact email address, Johnny Sheng and WuBi explained that they previously listed their email username as the registrant name due to the lack of a privacy protection service for ".ai" domain names and that they had updated the registrant name to their real names. They also presented identification showing that their legal names are "盛军强" (whose English name is "Johnny Sheng" or "Junqiang Sheng") and "吴比" ("WuBi").

The Complaint originally initiated this dispute against Forgetmyface. After receiving notice of the updated registrant information from 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi), the Complainant considered their arguments and materials and amended the Complaint accordingly (as to which, see section 6.1B *infra*).

In view of the above circumstances, the Panel finds that the proper Respondents are Forgetmyface / 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi). All three are referred to below separately and collectively as "the Respondent" except as otherwise shown.

Further, the Respondent presented evidence showing that it established a Chinese company named "重庆拜读科技有限公司" ("Chongqing Baidu Technology Co., Ltd") in 2017. However, that company was later deregistered. Even though Mr. Sheng granted the company a right to use the disputed domain name in July 2017, nothing in the record shows that the company is now, or has ever been, the holder of the disputed

domain name registration. Further, it can also be noted that the email communications submitted in response to the Complaint were received from 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi). Accordingly, the Panel does not consider the company to be a proper respondent in this proceeding.

B. Late Submission of Informal Response and Parties' Respective Supplemental Filings

The Complainant suggests that the Panel disregard the Respondent's email communication of January 14, 2024, because it was submitted after the deadline. The Respondent submitted that this email communication was filed late because it was very busy at the end of the year and did not notice the Notification of Complaint until the previous day.

The Panel notes that the Respondent's email communication of January 14, 2024 was essentially an informal Response, filed 5 days late. The Respondent sent a supplementary email communication on January 16, 2024, presenting additional evidence in support of statements made in the informal Response. On January 18, 2024, the Complainant requested information about the relationship among the Respondents. On the same day, the Respondent replied to that request for information (see section 6.1A *supra*). On January 19, 2024, the Complainant submitted an amendment to the Complaint, in which it addressed the new evidence in the informal Response and subsequent emails from the Respondent that it could not have reasonably anticipated at the time when it filed the Complaint. On January 21 and January 24, 2024, the Respondent sent further email communications.

Paragraphs 10(b), (c) and (d) of the Rules provide that "[i]n all cases, the Panel shall ensure that the Parties are treated with equality and that each Party is given a fair opportunity to present its case"; that "[t]he Panel shall ensure that the administrative proceeding takes place with due expedition"; and that "[t]he Panel shall determine the admissibility, relevance, materiality and weight of the evidence". Although paragraph 12 of the Rules empowers the Panel, in its sole discretion, to request further statements or documents from either of the Parties, this does not preclude the Panel from accepting unsolicited filings. See *Delikomat Betriebsverpflegung Gesellschaft m.b.H. v. Alexander Lehner*, WIPO Case No. [D2001-1447](#).

The Panel notes that the informal Response, and the supplementary email communications from the Respondent, provide important clarifications regarding the updated registrant information and they reply in detail to the Complaint with arguments and evidence not otherwise found on the record. The Complainant has taken the opportunity to rebut new arguments presented in the informal Response and will suffer no unfairness if all the Respondent's email communications are accepted. All these submissions were received prior to the appointment of the Panel and accepting them will not delay the proceeding.

Therefore, the Panel exercises its discretion to accept the informal Response and the Parties' respective supplemental filings as part of the evidence on the record and will take them into consideration according to their relevance, materiality, and weight.

6.2 Substantive Issues

Paragraph 4(a) of the Policy provides that the Complainant must prove 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.

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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of the BAIDU trademark for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.2.1.

The entirety of the BAIDU mark is reproduced within the disputed domain name. The only additional element is the use of the country code Top-Level Domain (“ccTLD”) “.ai” which, as a standard requirement of domain name registration, may be disregarded in the assessment of identity or confusing similarity. Accordingly, the Panel finds that the disputed domain name is identical to the mark for the purposes of the Policy. See [WIPO Overview 3.0](#), sections 1.7 and 1.11.

The Respondent queries whether the Complainant “has a business or trademark on the island of Anguilla”. However, bearing in mind the global nature of the Internet, the Panel considers the jurisdictions where the Complainant’s trademark is valid to be irrelevant in the assessment of identity or confusing similarity. See [WIPO Overview 3.0](#), section 1.1.2.

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 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 3.0](#), section 2.1.

The Panel will assess the Respondent’s claimed rights or legitimate interests in the present, i.e., with a view to the circumstances prevailing at the time when the Complaint was filed. See [WIPO Overview 3.0](#), section 2.11.

In the present case, the disputed domain name is identical to the Complainant’s BAIDU mark, which creates a risk that it will be understood as implying an affiliation with the Complainant. That risk is exacerbated by the incorporation of the ccTLD extension “.ai”, which can be read as an abbreviation of “artificial intelligence”, a field of commerce in which the Complainant is very active. The Complainant submits that the Respondent is not a licensee of the Complainant, nor has the Respondent otherwise been allowed to use the Complainant’s BAIDU trademark, in a domain name or otherwise. The Complainant provides evidence that the disputed domain name resolves to webpage on a broker’s website where it is merely offered for sale. The Panel does not consider that to be a use of the disputed domain name in connection with a bona fide offering of goods or services for the purposes of the Policy, nor is it a legitimate noncommercial or fair use of the disputed domain name. Further, the Respondent’s names are 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) and 吴比 (WuBi), while the Respondent was previously identified in the Registrar’s Whols database as “Forgetmyface”. None of these names resembles the disputed domain name.

In summary, the Panel considers that the Complainant has made a prima facie case that the Respondent lacks rights or legitimate interests in respect of the disputed domain name.

Turning to the Respondent’s arguments, it presents evidence regarding the former use of the disputed domain name four years or more before the Complaint was filed. The Panel does not consider these arguments strictly relevant to the existence of any rights or legitimate interests in the disputed domain name at the present time. The Respondent refers to a Chinese company that it formed, the name of which may be transliterated and translated as “Chongqing Baidu Technology Co., Ltd”. However, that company was deregistered in 2019. There is no evidence that the Respondent is currently commonly known, or was ever

commonly known, by the disputed domain name or that that company was ever commonly known by the disputed domain name. The Respondent also referred to a poem webpage that was formerly associated with the disputed domain name. However, the disputed domain name ceased to resolve to that webpage long before the Complaint was filed. Even if the Respondent reverted to the poem webpage after it received notification of this dispute, that was simply to show the Panel how the site formerly looked and does not demonstrate any rights or legitimate interests under the Policy at the time when the Complaint was filed.

The Respondent points out that there are multiple combinations of Chinese characters that correspond to “baidu” besides those in the Complainant’s name. However, the evidence does not show that the Respondent has used the disputed domain name in connection with any such combination besides “拜读” (meaning “read with respect”), which use the Panel considers pretextual for the reasons set out in section 6.2C *infra*. Moreover, evidence presented by the Complainant shows that various parties hold Chinese trademark registrations for the characters “拜读” but the Respondent is not one of them.

In summary, the Panel finds that the Respondent has not rebutted the Complainant’s prima facie showing that the Respondent has no rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

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

C. Registered and Used in Bad Faith

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. The first such circumstance is as follows:

“(i) circumstances indicating that [the Respondent has] registered or [the Respondent has] acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of [the Respondent’s] documented out-of-pocket costs directly related to the domain name.”

According to the evidence provided by the Respondent, it purchased the disputed domain name in May 2017, many years after the Complainant’s registration of the BAIDU mark. Given the massive popularity of the Complainant’s 百度-BAIDU Internet search engine in China, where the Respondent is based, there can be no serious doubt that the Respondent was aware of the Complainant’s 百度 and BAIDU marks when it purchased the disputed domain name in May 2017. The disclaimer on the webpage formerly associated with the disputed domain name referred to the Complainant by name, confirming that it was aware of the Complainant.

The Respondent provides an alternative explanation for its original registration and use of the disputed domain name. The evidence shows that, shortly after the Complainant’s representative enquired about a transfer of the disputed domain name on June 23, 2017, it established “重庆拜读科技有限公司” (“Chongqing Baidu Technology Co., Ltd”) on July 5, 2017. Days later, 盛军强 (Junqiang Sheng a/k/a Johnny Sheng) granted this company a license to use the disputed domain name. Based on this record, the Chongqing company had only a tenuous connection to the disputed domain name. The second word in the company name was the title of the webpage (“拜读”, meaning “read with respect”) which may be transliterated as “baidu”. Under the title, the disputed domain name was displayed prominently. The webpage also displayed the text of a classical Chinese poem which, as an item of reading material, provided minimal context for the webpage title. The note at the bottom of the webpage (described in section 4 above) disclaimed a connection with the Complainant, which uses different characters in its trademark and name (百度), but the note did not disclaim a connection with any of the third parties that use the same characters in their trademarks and names as the website title (拜读). The Respondent also claims that it chose the ccTLD “.ai” as a transliteration of the Chinese character “爱” (meaning “love”). The Panel considers that the interpretation of the disputed domain name as a transliteration of Chinese characters meaning “read with respect.love” to be contrived. Taking into consideration all these circumstances and the fact that the

disputed domain name is identical to the Complainant's famous mark, the Panel considers that the probable purpose of the webpage title, the webpage content including the disclaimer, and the contemporaneous incorporation of the webpage title in the name of the Respondent's company, was to provide a pretext for the composition of the disputed domain name and to circumvent the application of the Policy should the Complainant seek to enforce its rights.

The Respondent claims that the webpage associated with the disputed domain name was one of various education-related webpages that its company formerly operated. The Panel has reviewed archived screenshots of the other webpages, which purported to be search engines for test questions and essays with no apparent similarity to the poem webpage and no reference to the Respondent's company. They do not support an inference that the poem webpage associated with the disputed domain name was genuinely intended as an educational site. The Respondent also alleges that it closed the company and the poem webpage and other websites because they were unprofitable but this does not demonstrate a change of purpose because the poem webpage was ostensibly non-profit all along.

The Panel notes that the Respondent acquired the disputed domain name at the considerable cost of USD 12,000 plus tax, which does not seem to reflect its value for use in connection with a noncommercial webpage displaying a poem. Despite the Respondent's rejection of an initial enquiry by the Complainant's representative regarding a possible transfer, the disputed domain name has resolved since 2019 to a broker's website where it has been offered for sale for USD 50,000, and now USD 29,999. Noting that the disputed domain name is identical to the Complainant's trademark, and considering the asking prices, in the Panel's opinion, they are more likely than not to reflect the capacity of the Complainant or its competitors to pay them. Given that the former poem webpage appears to have been pretextual, the Panel considers that the use of the disputed domain name for the last four years up to the time when the Complaint was filed is more likely than not to indicate the Respondent's primary purpose for the disputed domain name since the time of its registration, *i.e.*, to capitalize on the value of the Complainant's mark through resale.

The Respondent acknowledges that its current asking price for the disputed domain name is double what it paid. Regardless of whether the Respondent considers such a profit to be reasonable, or its intended purpose for the profit to be justified, there is no dispute that the asking price is in excess of the Respondent's documented out-of-pocket costs directly related to the disputed domain name. As such, the Panel finds that the circumstances fall within the terms of paragraph 4(b)(i) of the Policy.

The Respondent references news stories regarding the Complainant and its business but, as these are unrelated to the disputed domain name and the Policy, they do not need to be considered further here.

Accordingly, the Panel finds that the disputed domain name has been registered and is being used in bad faith.

Therefore, 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 <baidu.ai> be transferred to the Complainant.

/Matthew Kennedy/

Matthew Kennedy

Sole Panelist

Date: February 8, 2024