

ADMINISTRATIVE PANEL DECISION

The NOCO Company v. Registration Private, Domains By Proxy, LLC
Case No. DAI2025-0022

1. The Parties

The Complainant is The NOCO Company, United States of America (United States), represented by Jones Day, United States of America.

The Respondent is Registration Private, Domains By Proxy, LLC, United States of America.

2. The Domain Name and Registrar

The disputed domain name <noco.ai> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on June 2, 2025. On June 3, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 3, 2025, 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 (Privacy Protected c/o NameCheap, Inc.) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 6, 2025, 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 amendment to the Complaint on June 6, 2025.

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 June 13, 2025. In accordance with the Rules, paragraph 5, the due date for Response was July 3, 2025.

On July 1, 2025, the Center received email communication from a third Party claiming to be the owner of the disputed domain name. The Third Party wrote again on July 3, 11, and 18, 2025. On July 21, 2025, the Center acknowledged receipt of the third Party's communications and pursuant to paragraph 6 of the Rules, Center informed the Parties that it would proceed with the panel appointment process.

The Center appointed Warwick A. Rothnie as the sole panelist in this matter on July 28, 2025. 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 August 12, 2025, the Panel issued Administrative Panel Order No 1 pursuant to paragraph 12 of the Rules. Information provided by the Respondent from the Registrar showing the websites the disputed domain name resolved to appeared inconsistent with materials provided by the Complainant. Before making adverse findings in relation to that issue, the Panel considered it appropriate to provide the Complainant with an opportunity to clarify or explain. In accordance with the Panel Order, the Complainant submitted a supplemental filing on August 19, 2025. Although the Panel Order provided for the Respondent to file and serve by August 26, 2025 a supplemental filing in reply to the Complainant's supplemental filing, no further supplemental filing has been received by the Center.

4. Factual Background

The Complainant designs and manufactures premium consumer battery chargers, jump starters and batteries as well as a wide range of accessories.

The Complainant's origins can be traced to a business established by Joseph Henry Nook, a local tyre and battery distributor, in Cleveland, Ohio in the United States in 1914. At some point after this, Mr Nook began manufacturing and distributing a battery corrosion preventative he named "NCP2" which the Complaint claims was the world's first such product. In around February 1985 – 1986, Mr Nook was elected to membership of the Automotive Hall of Fame Inc. which is apparently an international organization for people in the automotive industry.

Annex 4 to the Complaint includes evidence showing that since 2000 the Complainant holds 204 patents or patent applications for a range of the products identified above including a number of design patents for integrated circuits.

The Complaint does not make clear when the Complainant or its relevant predecessor first adopted NOCO as a trademark or its name. However, the Complaint does include evidence that the Complainant owns numerous registered trademarks in the United States for NOCO:

- (a) United States Trademark Reg. No. 1,165,271, NOCO, which was registered on August 18, 1981 for Hand Tools for Use with Batteries in international class 23 which claimed first use in commerce in April 1971;
- (b) United States Trademark Reg. No. 1,302,394, NOCO, which was registered on October 30, 1984 Battery securing and electrical equipment in international classes 6 and 9 and which claimed first use in commerce in December 1979;
- (c) United States Trademark Reg. Nos. 1,448,049 & 1,448,179, NOCO, which were registered on July 21, 1987 for, respectively cleaning compounds, terminal protectors, booster cables and battery cables in international classes 3, 9 and 11 with the earliest first use in commerce being claimed for terminal protectors, booster cables and clamps in 1940;
- (d) United States Trademark Reg. No. 5,238,298, NOCO, which was registered on July 4, 2017 for battery chargers, jump starters, battery packs in international class 9 and claiming first use in commerce in March 2009;

(e) United States Trademark Reg. No. 7,014,919, NOCO, registered on April 4, 2023 for corrosion prevention coatings, cleaning compounds, chargers, solar chargers, batteries and the like in international classes 2, 3 and 9 and claiming first use in commerce in respect of the chemical cleaning compounds since April 1967; and

(f) United States Trademark Reg. No. 7,707,254, NOCO, registered on February 25, 2025 for air pumps, compressors, tire inflators in international classes 7 and 12 and claiming first use in commerce in June 2024.

In its supplemental filing, the Complainant states that it has been using the NOCO trademark in relation to its products since 1967. The supplemental filing also includes evidence of numerous other registrations for NOCO in the United States. Further, a declaration submitted to the United States Patent and Trademark Office in connection with an application to register the “NOCO X” mark included in the supplemental filing discloses that the Complainant has spent in excess of USD 100 million in advertising expenditures on media including television, magazines, Internet ads with Amazon.com, Google and Facebook and trade shows as well as social media platforms.

Many of the Complainant’s products advertised on Amazon.com have more than 10,000 ratings. One product, the NOCO BOOST PLUS, has over 116,000. The Complainant’s YouTube channel (featuring the NOCO trademark) has 1.26 million subscribers. The Complainant’s Facebook page has 117,000 followers. The Complainant’s Instagram account, established in 2013, has 250,000 followers. According to the supplemental filing, Google analytics data records that the Complainant’s website at “www.no.co” had over five million new users and over 25 million pageviews between June 2018 and June 2023.

According to the Whois report, the disputed domain name was registered on July 16, 2021. However, the email communications received by the Center on and after July 3, 2025 satisfy the Panel that the current registrant became the registrant by transfer on January 21, 2025 on payment of a fee to the previous owner.¹

The Complaint includes a link to a capture by the Wayback Machine showing that, as recently as May 11, 2025, the disputed domain name redirected to a website headed “cosplays-manga.com” which featured pornographic videos mostly involving women performing sexual acts in various “cosplay” roles.

According to the communications received by the Center from the Respondent, however, the disputed domain name has been redirected since January 21, 2025 only to a Github account or a Google search page. The redirect information and creation dates have been provided by the Registrar in a communication with the Respondent.

Although the Respondent has obscured the details of the Github account, the Panel has ascertained there is a Github account for “nocoai”. Its content is accessible only to members of the account holder and not publicly available.²

The Respondent is also the holder of 13 other domain names based on “noco” including <nocoai.com> and <nocoai.io>. The former of which was registered on October 18, 2021 and the latter, on January 27, 2023. Both resolve to Registrar provided parking pages with pay-per-click (PPC) advertisements. In the Complainant’s supplemental filing, the PPC advertisements are to what appear to be mobile telephone recharging services and Mother’s Day necklaces.

¹ The Registrar’s verification notice did not identify the identity of the underlying registrant. The Respondent’s identity was disclosed only in the emails received by the Centre on and after July 3, 2025. As the Panel is satisfied that the correspondent is the underlying registrant, the Panel will refer to the current registrant as the Respondent rather than the Privacy Service in whose name the registration is currently recorded. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, (“[WIPO Overview 3.0](#)”), section 4.4.5.

² [WIPO Overview 3.0](#), section 4.8.

The Respondent also says he is the founder of Nocodb Inc., a Delaware C-Corporation. There is company registered in Delaware in the United States which was incorporated on November 8, 2021.

Although this company was incorporated in the United States state of Delaware, the only address provided for it (and for the Respondent) by the Respondent is in the United Kingdom.

There is also a website at “www.nocodb.com” which allows users to build “no-code database solutions with ease of spreadsheets. Bring your own database or choose ours! Millions of rows? Not a problem. Your Data. Your rules. You are in control.” The website states “Nocodb is now available in Beta” but also claims to be trusted “by 18,000+ Organisations”. Other claims on the screenshots of the website included in the supplemental filing are that there have been more than 12 million Docker downloads; there are more than 5,900 community members; the project has received more than 48,000 Github stars and is in the Top 3 open source no-code projects on Github. These statistics have not been verified. However, the Panel has verified that there is also a publicly accessible Github account for “nocodb” which, at the time of writing, has 56.7 thousand “stars”.³

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.

The Respondent has “demanded” an extension of 30 days in which to file a Response claiming that there has been a complete failure of notice. However, the Center notified the dispute and sent the Complaint documentation to the addresses verified by the Registrar as the registrant’s contact details, namely “Registration Private, Domains By Proxy, LLC” which is a service provider that enables the display of its contact information in the publicly available WhoIs instead of the contact details of the “underlying registrant”. No further contact details for the underlying registrant were disclosed by the Registrar in this procedure. Further, the Respondent has an obligation under the Respondent’s contract with the Registrar to ensure that the Registrar’s records are accurate and up to date: Registration Agreement clause 14. In these circumstances, the Respondent cannot complain about the sending of materials to the addresses recorded in the WhoIs record.

A. Supplemental filing

As outlined above, in his email to the Center on July 3, 2025, the Respondent stated the Respondent had not received notice of the dispute until July 1, 2025, and required 30 days to prepare a Response. The Respondent’s email did outline the Respondent’s case briefly. In addition, the Respondent subsequently sent further emails to the Center on July 11 and 18, 2025 which included some further elaboration including supporting documentation.

³ [WIPO Overview 3.0](#), section 4.8.

The emails on July 18, 2025, replaced the contents of the July 11, 2025, emails by redacting some personal information the Respondent did not wish to be publicly available.

In its supplemental filing, the Complainant objects to the reception of the Respondent's late filed material.

The Panel did not grant the Respondent an extension of 30 days in which to file a Response. However, the Panel does accept into the record the Respondent's emails to the Center on July 11 and 18, 2025. The emails were received by the Center before the Panel was appointed and so have not delayed the resolution of the dispute. Further, their content is relevant to the dispute. Further still, the Complainant has not pointed to any relevant prejudice it did or could suffer. In these circumstances, the Panel considers it fair and equitable to accept the late filed submissions.

As the Complainant's supplemental filing addresses the matters raised in Administrative Panel Procedural Order No 1, the Panel admits it into the record.

B. Identical or Confusingly Similar

The first element that the Complainant must establish is that the disputed domain name is identical with, or confusingly similar to, the Complainant's trademark rights.

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 3.0](#), section 1.7.

The Complainant has proven ownership of numerous registered trademarks for NOCO, at least in the United States.

In undertaking the comparison between the disputed domain name and the Complainant's proven trademark, it is permissible in the present circumstances to disregard the country code Top-Level Domain (ccTLD) component as a functional aspect of the domain name system. [WIPO Overview 3.0](#), section 1.11.

On that basis, the entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

C. Rights or Legitimate Interests

The second requirement the Complainant must prove is that the Respondent has no rights or legitimate interests in the disputed domain name.

Paragraph 4(c) of the Policy provides that the following circumstances can be situations in which the Respondent has rights or legitimate interests in a disputed domain name:

- (i) before any notice to [the Respondent] of the dispute, [the Respondent's] use of, or demonstrable preparations to use, the [disputed] domain name or a name corresponding to the [disputed] domain name in connection with a bona fide offering of goods or services; or
- (ii) [the Respondent] (as an individual, business, or other organization) has been commonly known by the [disputed] domain name, even if [the Respondent] has acquired no trademark or service mark rights; or
- (iii) [the Respondent] is making a legitimate noncommercial or fair use of the [disputed] domain name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

These are illustrative only and are not an exhaustive listing of the situations in which a respondent can show rights or legitimate interests in a domain name.

While 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 often impossible 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. If the respondent fails to come forward with such relevant evidence, the complainant is deemed to have satisfied the second element. [WIPO Overview 3.0](#), section 2.1.

There is no dispute between the Parties that:

- (1) The Respondent registered the disputed domain name after the Complainant began using the trademark and also after the Complainant had registered its trademark;
- (2) The Respondent is not affiliated with the Complainant;
- (3) The Complainant has not otherwise authorised the Respondent to use the disputed domain name; and
- (4) The disputed domain name is not derived from the Respondent's personal name.

Given the paucity of material provided by the Respondent about these matters, the Complainant legitimately questions whether the company Nocodb Inc or the website at “www.nocodb.com” are related to the Respondent but, even assuming they are, the Complainant points out that they were adopted well after the Complainant established its rights and, having regard to the Complainant's use and reputation, the Respondent should have been aware of the Complainant's rights and so the adoption of those names was in bad faith. In any event, the Complainant further contends, the company and website support findings only that the Respondent would be commonly known as “nocodb”, not “noco” and was using only “nocodb” in connection with a good faith offering of services.

The Respondent does not specifically deny knowledge of the Complainant or its trademark. He says, however, he has adopted “noco” to develop a software product in the “no-code AI” industry, where “noco” is a common term of art.

The Panel starts with the verifiable fact that there is a website at “www.nocodb.com” which does provide some sort of online database service and bills itself as “The Open Source Alternative to Airtable”. As the Complainant points out, it is not possible to confirm from the material submitted by the Respondent that the Respondent is the holder of this domain name as, for reasons best known to himself, the Respondent has obscured the full name of his domain names (apart from the disputed domain name and the two “nocoai” domain names).

One of the domain names, noco[], however, is listed by the Registrar's report submitted by the Respondent as expiring on April 14, 2026. A Whois search by the Panel⁴ discloses that the domain name <nocodb.com> was registered on April 14, 2021, and expires on April 14, 2026. The Registrar of <nocodb.com> disclosed in the Whois report is Namecheap, the same registrar as the Registrar of the disputed domain name.

In these circumstances, while the matter is not as clear as it could be, the Panel considers it likely that the Respondent is the holder of the domain name <nocodb.com> as well as the disputed domain name.

⁴ [WIPO Overview 3.0](#), section 4.8.

The fact that the website proclaims the software is in Beta does not preclude the use being in good faith in and of itself. It is publicly available and, from the Documentation page, appears to have a number of active social media channels. Whether or not there are 18,000 organisations using it is not something the Panel can or does express a view on. The apparently related Github account does have tens of thousands of “stars”. Further, on the materials before the Panel, the website does not appear to be a colourable attempt to give the appearance of genuine use.

Subject to consideration of the potential for conflict with, or trading on, the Complainant’s rights, the Panel does not agree that someone with rights or legitimate interest in <nocodb.com> or “Nocodb” could not also have rights or legitimate interests in <noco.xx> or <noco.xxx>. In such a case, “noco” can readily be seen as derived from and related to “nocodb”. The rights or interests of a legitimate user of “nocodb” are not necessarily restricted strictly to use of that precise form.

Whether that is so in any particular case will depend on the facts and circumstances of the case. As already noted, in this case the Complainant contends that the Respondent’s adoption and use of “Nocodb” and, further, “noco” cannot be in good faith in the face of the Complainant’s long-standing use and reputation.

The Panel is not prepared to make that finding in this case. While the Complainant does claim in the Complaint and supplemental filing that any use of “noco” is inconsistent with its rights, that appears difficult to accept in the present context.

First, it should be borne in mind that “noco” is a four letter combination which could potentially represent a number of different things. Indeed, the Respondent points out that <noco.com> is registered by a third party which, from the Panel’s inspection appears to be used by a plumbing service in the United States. In the absence of evidence of targeting of the Complainant or its trademark or a real potential for confusion to arise between the source of goods or services provided by a second, or junior, user and the goods or services provided by the Complainant, the Complainant cannot claim a monopoly on all and any uses of “noco”. Secondly, although the Respondent has not provided evidence of the common use of “noco” as an abbreviation or acronym in the no-code AI industry, it is a plausible truncation. Thirdly, the field of no-code databases or online databases is very remote from the Complainant’s apparent field.

The resolution of the “nocoai” domain names to parking pages rather than to the “www.nocodb.com” website does at least raise questions about the Respondent’s claims.

In the circumstances, however, that unexplained conduct does not outweigh what appears on the limited record in this case to be genuine use of “nocodb” in connection with a no-code online database and the relevance of the disputed domain name to that project.

Accordingly, the Panel finds that the Respondent has rebutted the prima facie case established by the Complainant. Therefore, the Complainant has not established the second requirement under the Policy and the Complaint must fail.

D. Registered and Used in Bad Faith

As the Complaint must fail, no good purpose would be served by considering third requirement.

E. Reverse Domain Name Hijacking

The Respondent contends the Complaint has been brought in bad faith.

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 3.0](#), section 4.16.

In support of his allegation, the Respondent points to the Complainant's claim that the disputed domain name points to a pornographic website. The Respondent also contends the Complainant's claim to exclusive rights of "noco" is weak and, given the third party use of <noco.com> and the Respondent's industry being entirely divorced from the Complainant's battery-related products, discloses bad faith targeting.

In the Complaint, the Complainant stated:

"The Disputed Domain Name redirected to <https://cosplays-manga.com/lander>, a website featuring graphic pornography and advertisements for 'AI girlfriends,' as recently as May 11, 2025."

Given an opportunity to address this in light of the materials submitted by the Respondent, the Complainant's supplemental filing stated:

"Complainant further clarifies that the Complaint's sentence stating that the "Disputed Domain Name redirected to <https://cosplays-manga.com/lander>, a website featuring graphic pornography and advertisements for 'AI girlfriends,' as recently as May 11, 2025," contained an error with the identified date. Complainant hereby amends that sentence of the Complaint as follows: "As of June 2, 2025, the Internet Archive's WayBack Machine showed that the Disputed Domain Name redirected to <https://cosplays-manga.com/lander>, a website featuring graphic pornography and advertisements for 'AI girlfriends,' as recently as July 18, 2024."

This is not really an adequate explanation given the seriousness of the misrepresentation. The allegation that the disputed domain name resolved to a pornographic website as recently as May 2025 could, if there had been no Response, been decisive in the determination of the Complaint but, as it turns out, was wrong and likely to mislead the Panel.

Further, the material in the Complainant's supplemental filing about its reputation can and should have been included in the Complaint. As the Panel considered it necessary to provide the Complainant with an opportunity to explain the claims about the pornographic website before considering whether to make a finding the Complainant had deliberately sought to mislead the Panel, that material would not have been before the Panel.

On balance, however, the Panel has decided not to make a finding of reverse domain name hijacking in this case. First, the disputed domain name does not resolve to an active website. Secondly, the Complainant did not know the identity of the Respondent until that was disclosed in the emails from the Respondent in July 2025. Even assuming the Complainant was aware of the website at "nocodb.com", there does not appear to be anything on that website that associates it with the Respondent.

In these circumstances and having regard to the substantial reputation the Complainant has in "noco", the Panel considers the Complainant did have a legitimate basis for filing the Complaint. The explanation about the misrepresentation about the pornographic website has not been adequately explained. Accepting that the disputed domain name did resolve to the pornographic website in the course of 2024 (although there may be some doubt about that too), the Complainant does not appear to have been aware of the change of "ownership" of the disputed domain name in January 2025. That information was not available from the free, publicly available Whois report. Whether more thorough investigations would have disclosed it, is not clear on the record.

As a result, the Panel does not find reverse domain name hijacking in this case.

6. Decision

For the foregoing reasons, the Complaint is denied.

/Warwick A. Rothnie/

Warwick A. Rothnie

Sole Panelist

Date: September 3, 2025