

## **ADMINISTRATIVE PANEL DECISION**

Nvidia Corporation v. Yang  
Case No. DAI2025-0054

### **1. The Parties**

The Complainant is Nvidia Corporation, United States of America (“United States”), represented by Kilpatrick Townsend & Stockton LLP, United States.

The Respondent is Yang, China.

### **2. The Domain Name and Registrar**

The disputed domain name <nvidia.com.ai> is registered with DNS11 GROUP (the “Registrar”).

### **3. Procedural History**

The Complaint was filed in English with the WIPO Arbitration and Mediation Center (the “Center”) on October 21, 2025. On the same day, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name; on November 4 and November 11, 2025 the Center sent follow-up reminder email communications to the Registrar. On November 11, 2025, the Registry transmitted by email to the Center its verification response confirming that the Respondent is listed as the registrant and providing the contact details. The Center sent an email communication to the Complainant on November 14, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Respondent sent email communications in English to the Center on November 16 and November 17, 2025. The Complainant filed an amended Complaint in English on November 18, 2025.

On November 18, 2025, the Center informed the Parties in Chinese and English, that the language of the Registration Agreement for the disputed domain name is Chinese. On November 19, 2025, the Complainant confirmed its request that English be the language of the proceeding. The Respondent sent email communications in Chinese to the Center on November 19 and November 20, 2025, objecting to the Complainant’s language request.

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 in English and Chinese of the Complaint, and the proceedings commenced on November 20, 2025. In accordance with the Rules, paragraph 5, the original due date for Response was December 10, 2025. Pursuant to the Rules, paragraph 5(b), the due date for Response was extended to December 14, 2025 at the Respondent's request. The Center received email communications in English (and in one case partially in Chinese) from the Respondent on November 22, November 25 and November 27, 2025. The Response was filed in Chinese with the Center on December 14, 2025.

On November 28, 2025 and December 3, December 8, December 10, and December 17, 2025, the Center received email communications in Chinese from a different email address from a person identified as “杨” (i.e., Yang).

On December 17, 2025, the Center received an unsolicited supplemental filing in English from the Complainant. On December 22, 2025, the Center received a further unsolicited supplemental filing in Chinese from Yang.

The Center appointed Matthew Kennedy as the sole panelist in this matter on December 24, 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.

The Center received a brief email communication in Chinese and English from Yang on December 26, 2025.

#### **4. Factual Background**

The Complainant is a technology company that provides, among other things, graphics processing units (GPUs) for gaming; as well as artificial intelligence computing and data center solutions. The Complainant holds multiple trademark registrations in multiple jurisdictions, including the following:

- United States trademark registration number 1,895,559, for NVIDIA, registered on May 23, 1995, specifying goods in class 9;
- United States trademark registration number 3,588,524 for NVIDIA, registered on March 10, 2009, specifying services in class 35;
- United States trademark registration number 3,591,837 for NVIDIA, registered on March 17, 2009, specifying services in class 41; and
- Chinese trademark registration number 30220790 for NVIDIA, registered on March 21, 2019, specifying goods in class 11.

The above trademark registrations are current. According to evidence presented by the Complainant, its NVIDIA mark was ranked in the Kantar BRANDZ Most Valuable Global Brands reports in 2021, 2022, 2023 and 2024. The Complainant has registered the domain name <nvidia.com> that it uses in connection with a website that prominently displays the NVIDIA mark and provides information about the Complainant and its products. The Chinese version of that website is associated with the domain name <nvidia.cn>. The Complainant has also registered the domain name <nvidia.ai> that redirects to a tab on its website dedicated to its artificial intelligence products.

The Respondent is an individual based in China.

The disputed domain name was registered on March 25, 2023. It resolves to a webpage on a domain name broker's platform advertising it for sale. The webpage indicates that the seller's asking price is USD 1,670,000 and invites Internet users to submit offers.

The Complainant received an email in English sent by a person named “Raymond”, using the Respondent’s contact email address on January 3, 2024, offering to sell the disputed domain name, including another domain name and two trademark registrations. The Complainant subsequently received follow-up emails in English from the same person using the same email address. One of these emails, dated August 26, 2025, stated that “Given NVIDIA’s leadership in AI and the global recognition of your brand, this domain holds strategic importance for your company – both for brand protection and future AI initiatives, this asset aligns perfectly with NVIDIA’s vision.”

According to evidence presented by the Complainant, the Respondent’s contact email address is displayed on a LinkedIn profile that offers for sale various domain names and trademarks associated with well-known brands, including NVIDIA.

## **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 NVIDIA mark.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. There is no relationship between the Complainant and the Respondent that would give the Respondent the right to own or use any domain name incorporating the Complainant’s NVIDIA mark.

The Respondent registered and is using the disputed domain name in bad faith, as evidenced by the fact that the Respondent has sent numerous emails to the Complainant offering to sell the disputed domain name and listing it for sale for well over a million dollars, a price that far exceeds the standard cost of “.ai” domain names.

### **B. Respondent**

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

The Respondent declares that he has never contacted the Complainant by any of the official contact methods published on the Complainant’s website. He does not own any of the domain names to which the Complainant refers. He did not create or control the LinkedIn page to which the Complainant refers. There has never been any interaction, negotiation, or sales communication between him and the Complainant. His actions were merely tests involving random character combinations within his personal client environment. Email addresses in the @nvidia.com domain should not be considered valid contact addresses for the Complainant.

“Nvidia” is not a unique, inherent trademark term. Its origin can be traced to the Latin root “invidia”. The Respondent discarded the initial letter “i” and combined it with transliterations of the Chinese words “女” (“nv” meaning woman) and “嗲” (“dia” meaning cute), while adding the middle letter “i” for pronunciation. His intention was to use the disputed domain name in connection with the dubbing of cute female voices, without specifically targeting the Complainant’s brand.

The disputed domain name contains the Secondary Level Domain (“2LD”) extension “.com.ai”. The Complainant is in effect demanding one of countless subdomains within the “.com.ai” 2LD, while “.ai” is the country code Top-Level Domain (“ccTLD”) extension for Anguilla, not a global domain. The Complainant has no company or registered trademarks in Anguilla. No companies in Anguilla need the Complainant’s GPUs to train artificial intelligence. The Complainant has no trademark rights in Anguilla, where its trademark

application is still pending. The Complainant deals in high-end products; its customer base represents a very small percentage of the global population and it lacks the widespread recognition of a consumer brand.

The disputed domain name has not been used with any active website. The broker webpages offering it for sale, presented by the Complainant, are unrelated to the Respondent. The screenshots presented by the Complainant are unverifiable. There is no price for the disputed domain name until a sale is agreed. The disputed domain name has not been used to deceive consumers, whether by advertising or selling Nvidia products or otherwise. The dispute only concerns one disputed domain name; the Respondent has not registered any others.

This is a case of Reverse Domain Name Hijacking. The Complainant knew that it could not satisfy the three requirements of paragraph 4(a) of the Policy. The disputed domain name is not used to deceive consumers; passive holding does not constitute bad faith. The Complainant already has a domain name sufficient for its needs. This is a typical example of an attempt to exploit loopholes in arbitration rules to forcibly seize legitimate domain name assets.

## **6. Discussion and Findings**

### **6.1 Preliminary Issues**

#### **A. Identity and Contact Details of the Respondent**

Communications received by the Center from a person named “杨” (“Yang”) from an unverified email address allege that the Complaint does not identify the correct contact details for the Respondent. Yang alleges that the contact information in the Registrar’s Whois was maliciously created shortly before the commencement of this proceeding, and that the disputed domain name registration has long been associated with his email address. These allegations are repeated in the Response. Yang argues that the Respondent is not responsible for the correspondence sent from the Registrar-verified email address prior to this proceeding.

Paragraph 1 of the Rules provides that the “Respondent” means the holder of a domain name registration against which a complaint is initiated. In the present case, the Registrar has confirmed that the holder of the disputed domain name is indeed named “Yang”. The Complaint identifies the Respondent by that name. The Center forwarded the Complaint, including its annexes, to the email address for the Respondent verified by the Registrar, among other addresses. It is apparent from the content of the Response that the Center has achieved actual notice. The Response includes statements both from Yang and a person named “Raymond Morgan”, who operates the email account at the contact email address verified by the Registrar. The Response alleges that Yang and Raymond Morgan are two different people but Raymond Morgan is evidently an associate of Yang, if not his alter ego.

Accordingly, the Panel accepts both the Complaint and the Response as filed. Yang and Raymond Morgan are each referred to below as “the Respondent”, unless otherwise stated.

#### **B. Language of the Proceeding**

The language of the Registration Agreement for the disputed domain name is Chinese. Pursuant to the Rules, paragraph 11(a), in the absence of an agreement between the parties, or unless specified otherwise in the registration agreement, the language of the administrative proceeding shall be the language of the registration agreement.

The Complaint and amended Complaint were filed in English. The Complainant requested that the language of the proceeding be English for several reasons, submitting that the disputed domain name is in Latin characters; the Respondent engaged in pre-Complaint correspondence with the Complainant in English and operates an English language LinkedIn page, all of which evidences the Respondent’s ability to

communicate in English; the Complainant is unable to communicate in Chinese and cannot conduct the proceeding in Chinese without a great deal of additional expense and delay; and the Respondent has communicated with the Center in English during this proceeding.

The Response was filed in Chinese. The Respondent requested that the language of the proceeding be Chinese for several reasons, submitting that the disputed domain name is a transliteration of Chinese; that the Respondent does not have strong English skills sufficient for complex legal texts but uses a machine translation; his primary language is Chinese and translation costs will be prohibitively high for him. He submits that he does not operate the LinkedIn page, which is not operational; the domain names listed on the LinkedIn page do not belong to the Respondent; he has never proactively contacted the Complainant and can only access the Complainant's ".cn" domain; some of the emails addresses shown in evidence for the Complainant are not published on the Complainant's official websites and thus cannot be verified.

The initial email communications to the Center received from or on behalf of the Respondent or his associate were in English, indicating that he is able to communicate in that language. It is also clear from the Response that the Respondent has in fact understood the Complaint.

In exercising its discretion to use a language other than that of the registration agreement, the Panel has to exercise such discretion judicially in the spirit of fairness and justice to both parties, taking into account all relevant circumstances of the case, including matters such as the parties' ability to understand and use the proposed language, time and costs. See WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 4.5.1.

Having considered all the matters above, the Panel determines under paragraph 11(a) of the Rules that the language of the proceeding shall be English, but the Panel will accept all communications from the Parties in their original language, whether English or Chinese, without translation.

### **C. Unsolicited Supplemental Filings**

The Complainant made an unsolicited supplemental filing on December 17, 2025. The Respondent made an unsolicited supplemental filing in reply on December 22, 2025, prior to the appointment of the Panel, and another on December 26, 2025, after the appointment of the Panel.

Paragraph 12 of the Rules provides that "[i]n addition to the complaint and the response, the Panel may request or permit, in its sole discretion, further statements or documents from either of the Parties". At the same time, paragraph 10(b) and (c) of the Rules require the Panel to ensure that "each Party is given a fair opportunity to present its case" and that "the administrative proceeding takes place with due expedition". The purpose of the Policy is to provide a simple, inexpensive and quick administrative procedure for dealing with domain name entitlement disputes. Accordingly, the Panel will only permit the supplemental filing in exceptional circumstances, such as new facts, newly available evidence, or a material allegation in the Response that could not reasonably have been anticipated at the time of the Complaint.

The Panel observes that the stated purpose of the Complainant's supplemental filing is "to correct the factual and legal misstatements" in the Response. However, having reviewed the Complainant's supplemental filing, the Panel considers that most of the issues that it raises are in the form of a rebuttal to the arguments submitted within the Response, and/or concern the validity of the evidence presented with the Complaint. The Panel is already able to assess those issues on the face of that evidence. Accordingly, the Panel does not exercise its discretion to accept the Complainant's supplemental filing. Having declined to accept that filing, there is no reason to accept the Respondent's supplemental filings made in reply either. The Panel also notes that if the Panel had accepted the supplemental filings by the Parties, they would not have altered the outcome of the proceeding.

## 6.2 Substantive Issues

Paragraph 4(a) of the Policy provides that a complainant must demonstrate 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.

The burden of proof of each element is borne by the Complainant.

### 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 3.0](#), section 1.7.

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

The entirety of the NVIDIA mark is reproduced within the disputed domain name. The only additional element is a 2LD extension (".com.ai") which may be disregarded for the purposes of the Policy.

Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.7.

The Respondent draws attention to the fact that the disputed domain name contains the ccTLD extension for Anguilla and submits that the Complainant lacks trademark rights in that jurisdiction. However, the Panel notes the global nature of the Internet and the Domain Name System and recalls that the jurisdiction in which a complainant's trademark rights are valid is not considered relevant to the first element of the Policy. 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.

In the present case, the disputed domain name resolves to a webpage on a domain name broker's platform advertising it for sale. The Complainant submits that there is no relationship between the Parties that would give the Respondent the right to own or use any domain name incorporating the NVIDIA mark. In the Panel's view, these circumstances do not indicate that the Respondent is using the disputed domain name in connection with a *bona fide* offering of goods and services, nor that he is making a legitimate noncommercial

or fair use of the disputed domain name. Further, the Registrar has verified that the Respondent's name is Yang, which does not resemble the disputed domain name. The Respondent's associate or alter ego is named Raymond Morgan, which does not resemble the disputed domain name either. Nothing on the record indicates that the Respondent has been commonly known by the disputed domain name.

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.

Turning to the Respondent, he alleges that his original intention was to use the disputed domain name in connection with the dubbing of cute female voices. However, he provides no evidence of any demonstrable preparations to use the disputed domain name in that way. In any case, his explanation for his choice of the disputed domain name in connection with this meaning lacks credibility (as discussed below). Accordingly, 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.

Based on the record, 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. The first of those circumstances 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 [disputed] domain name;"

In the present case, the disputed domain name was registered in 2023, years after the registration of the Complainant's NVIDIA mark, including in China, where the Respondent is based. NVIDIA is a coined term, with no apparent meaning as spelt (without an initial "I"), other than as a reference to the Complainant and its products. The disputed domain name is identical to the mark, adding only a 2LD extension. The Complainant has made longstanding and widespread use of its mark, as evidenced by its inclusion in Kantar BRANDZ Most Valuable Global Brands reports prior to the registration of the disputed domain name. An email communication sent from the Respondent's contact email address prior to this proceeding specifically recited the Complainant's "leadership in AI and the global recognition of [its] brand", and there is no reason to doubt the email's authenticity. Furthermore, the Respondent's choice to register the NVIDIA mark in the ".ai" ccTLD also confirms an awareness of the nature of the Complainant's products in the field of artificial intelligence. The Respondent's explanation for his choice of the disputed domain name as a combination of the transcriptions of two Chinese words ("nv" and "dia") is highly contrived; in any case, it does not explain the insertion of an "i" between the words as none is necessary for pronunciation when the letters are read as a transcription of Chinese. In view of these circumstances, the Panel finds that the Respondent had the Complainant's NVIDIA mark in mind when he registered the disputed domain name.

As regards use, the disputed domain name resolves to a webpage on a domain name broker's platform advertising it for sale. The webpage indicates that the seller's asking price is USD 1,670,000 and invites Internet users to submit offers. Several email communications sent from the Respondent's contact email address to the Complainant prior to this proceeding also sought to elicit offers to purchase the disputed domain name and there is no reason to doubt the authenticity of those emails. These circumstances indicate that the Respondent registered the disputed domain name primarily for the purpose of selling it to the Complainant for valuable consideration in excess of his documented out-of-pocket costs directly related to the disputed domain name, within the terms of paragraph 4(b)(i) of the Policy.

The Respondent seeks to dissociate himself from responsibility for the offers to sell the disputed domain name sent to the Complainant prior to this proceeding. However, it is irrelevant whether the offers were sent to an unpublished email address as they were in fact addressed and sent to the Complainant. It is also clear that the offers were sent from the same contact email address that the Registrar verified in the disputed domain name registration, which was also used to send the Response. The Respondent also seeks to dissociate himself from responsibility for the offer to sell the disputed domain name on the broker's website. However, as the registrant, the Respondent is responsible for the use that is made of the disputed domain name. There is no evidence that the Respondent ever instructed the broker prior to receiving notice of this dispute to take down the webpage or the advertised price of USD 1,670,000.

The Respondent submits that he has not used the disputed domain name to deceive consumers. However, given that the circumstances of this case fall within the terms of paragraph 4(b)(i) of the Policy, consumer deception is not required, nor is a pattern of conduct of abusive domain name registrations. The Respondent also alleges that the Complainant lacks a market for its products in Anguilla and that it already has a domain name sufficient for its needs. However, even if those allegations were true, they would provide no justification for the Respondent seeking to exploit the value of the Complainant's trademark.

Therefore, the Panel finds that the Complainant has established the third element of the Policy.

#### **D. Reverse Domain Name Hijacking**

The Respondent alleges that the Complaint is an attempt at Reverse Domain Name Hijacking.

The Panel has upheld the Complaint. Further, the Complainant was under no obligation to initiate discussions with the Respondent regarding a possible transfer prior to this proceeding. Therefore, the Panel does not find that the Complaint has been brought in bad faith or that it constitutes an attempt at Reverse Domain Name Hijacking.

#### **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 <nvidia.com.ai> be transferred to the Complainant.

*/Matthew Kennedy/*  
**Matthew Kennedy**  
Sole Panelist  
Date: January 5, 2026