

ADMINISTRATIVE PANEL DECISION

Plura AI LLC v. Ilan Kadar, Plurai Inc.

Case No. DAI2026-0075

1. The Parties

Complainant is Plura AI LLC, United States of America (“United States”), represented by Law Offices of Seth W. Wiener, United States.

Respondent is Ilan Kadar, Plurai Inc., United States, represented by Goldfarb Gross Seligman, Israel.

2. The Domain Name and Registrar

The disputed domain name <plurai.ai> (hereinafter “Disputed Domain Name”) is registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on July 31, 2026. On August 3, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On August 5, 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 (Plurai Inc.) and contact information in the Complaint. The Center sent an email communication to Complainant on August 11, 2026, providing the registrant and contact information disclosed by the Registrar, and requesting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on August 11, 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”),¹ 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”).

¹ The UDRP applies to proceedings relating to Anguilla’s .ai ccTLD. See <https://www.wipo.int/en/web/amc/domain-name-disputes/ccTld/ai/index>.

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondent of the Complaint, and the proceedings commenced on August 25, 2026. In accordance with the Rules, paragraph 5, the due date for Response was September 18, 2026. The Response was filed with the Center on September 17, 2026. Respondent sent an email communication to the Center on September 10, 2026.

The Center appointed Lawrence K. Nodine as the sole panelist in this matter on September 22, 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

Complainant owns the United States trademark registration No. 8,084,216, the trademark PLURA (hereinafter sometimes the “Mark”), which issued December 30, 2025, based on an application filed March 28, 2025, that alleged that the Mark was first used on February 3, 2025, and first used in commerce on March 26, 2025.

The Complaint does not include any allegations or evidence describing Complainant’s history or business, but Complainant’s trademark registration describes the covered services as “[s]oftware as a service (SAAS) services featuring software for using artificial intelligence to generate images, write with shortcuts, summarize text, and craft chatbots.” The Panel’s own search located a website associated with <plura.ai> which promotes “AI agents for voice, SMS & RCS.”

The Disputed Domain Name was registered May 27, 2024. It currently resolves to a website that provides AI tools intended to evaluate and simulate AI agents. These tools are intended to optimize, in speed and safety, development processes that use AI.

5. Parties’ Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Disputed Domain Name.

Notably, Complainant contends that Respondent was incorporated in the State of Delaware on May 27, 2025, which was a couple of months after Complainant began (according to the allegations in its trademark registration) using the Mark in commerce. Complainant also asserts that Respondent failed to respond to Complainant’s July 10, 2026, cease-and-desist letter.

B. Respondent

Respondent contends that Complainant has not satisfied all three of the elements required under the Policy for a transfer of the Disputed Domain Name.

Respondent contends that the Disputed Domain Name is not likely to be confused with the Mark.

Respondent contends that it registered the Disputed Domain Name before Complainant acquired any trademark rights. Respondent offers evidence (a Delaware certificate of incorporation) that it was incorporated October 7, 2024. Respondent also offers evidence that in January 2025 it published its source code and a related research paper on the website associated with the Disputed Domain Name.

6. Discussion and Findings

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.

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 Panel finds the mark is recognizable 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.

Accordingly, the Panel makes no finding regarding whether Complainant has satisfied the first element of the Policy.

B. Rights or Legitimate Interests

Given the Panel's findings with respect to the third element of the Policy, the Panel makes no finding regarding the second element of the Policy.

C. Registered and Used in Bad Faith

Complainant has not proved that Respondent registered the Disputed Domain Name in bad faith. Respondent registered the Disputed Domain Name before the earliest date for which Complainant offers any evidence of trademark rights.

Complainant's trademark registration, which issued December 30, 2025, is effective under United States law as of March 28, 2025, the date the underlying trademark application was filed.² The application alleged that the Mark was first used on February 3, 2025, and first used in commerce on March 26, 2025.³

The Disputed Domain Name was registered on May 27, 2024, almost one year before the date that Complainant acquired trademark rights.⁴ Given this timeline, Complainant has not proved that Respondent registered the Disputed Domain Name in bad faith. "Subject to scenarios described in 3.8.2 below, where a respondent registers a domain name before the complainant's trademark rights accrue, panels will not normally find bad faith on the part of the respondent." [WIPO Overview 3.1](#), section 3.8.1. There is no evidence that the section 3.8.2 scenario occurred here.

The Panel acknowledges that the parties offer conflicting evidence about the date that Respondent was incorporated. There is no need to resolve this conflict. The relevant question is when the Disputed Domain Name was registered, regardless of the date of Respondent's incorporation.

² 15 U.S.C.1057(c).

³ Although not material in this case, it is worth noting that, under United States law, "[t]he allegation in an application for registration, or in a registration, of a date of use is not evidence on behalf of the applicant or registrant; a date of use of a mark must be established by competent evidence." 37 C.F.R. § 1.22(b)(2). See also, J. Thomas McCarthy, *McCarthy on Trademarks and Unfair Competition*, § 16:19 (5th Edition 2025)

⁴ Complainant did not allege or offer evidence that it acquired any unregistered common law rights before it applied for its federal trademark registration. The Panel notes that Complainant's cease and desist letter asserted that Complainant was "founded in 2022" and that it registered its domain name <plura.ai> on October 25, 2023. But Complainant makes no mention of these assertions in its complaint and offers no arguments or evidence to support them.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding.

The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.1](#), section 4.16. “Reasons articulated by panels for finding RDNH include: (i) facts which demonstrate that the complainant knew it could not succeed as to any of the required three elements ... such as registration of the disputed domain name well before the complainant acquired trademark rights...” *Id.*, section 4.16.

The Panel finds that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking.

7. Decision

For the foregoing reasons, the Complaint is denied.

/Lawrence K. Nodine/

Lawrence K. Nodine

Sole Panelist

Date: September 28, 2026