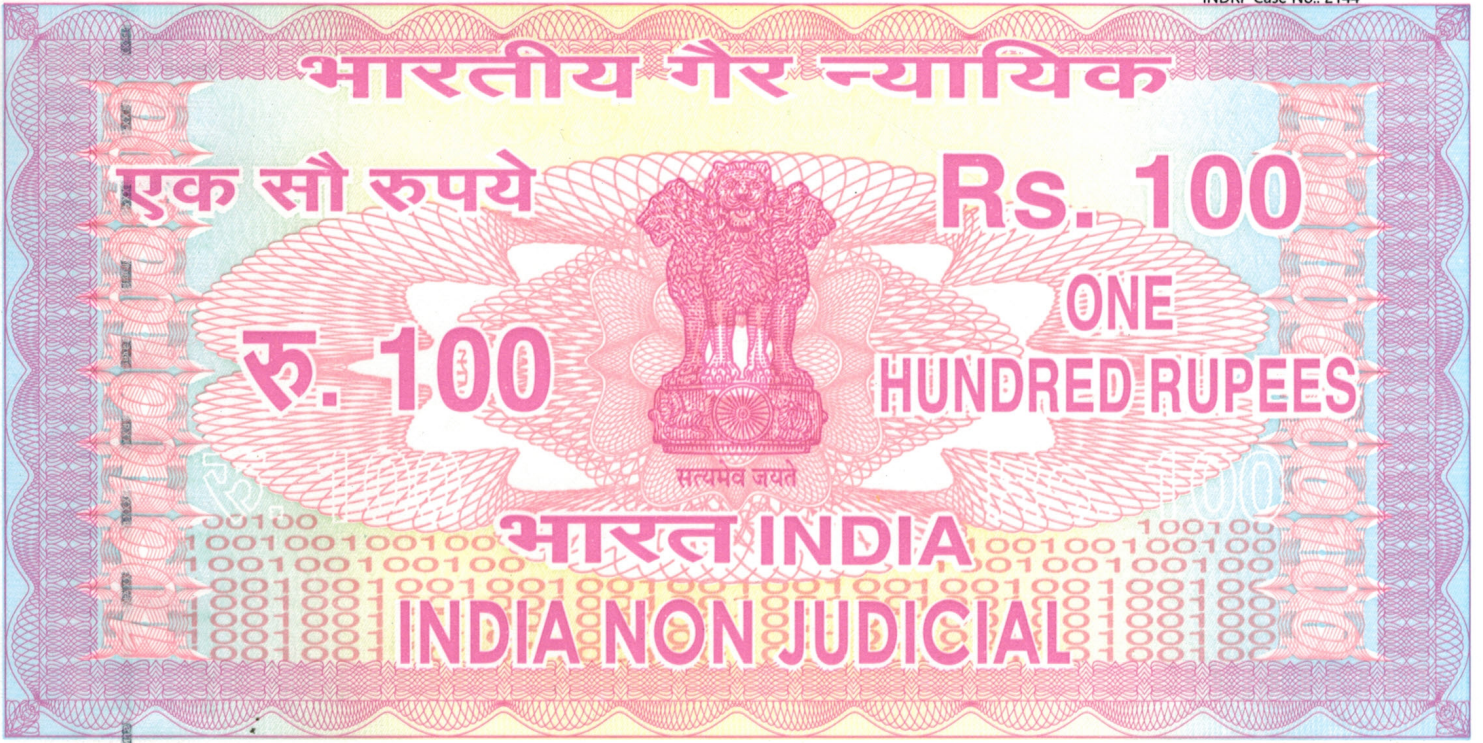




தமிழ்நாடு தமில்நாடு TAMILNADU

RAJA PANNIR SELVAM
CHENNAI-41.

FG 198402

[Signature]

K. SARAVANAN, M.Com

STAMP VENDOR

Lic No 1090 / B4 / CH(C)2021-5



BEFORE THE NATIONAL INTERNET EXCHANGE OF INDIA (NIXI)

IN THE MATTER OF ARBITRATION BETWEEN

Instagram, LLC

...Complainant

Versus

White Wolves LLC

...Respondent

IN RESPECT OF DISPUTED DOMAIN NAME:

<instander.org.in>

INDRP Case No.: 2144

ARBITRATION AWARD

[Signature]

BEFORE THE NATIONAL INTERNET EXCHANGE OF INDIA (NIXI)

IN THE MATTER OF ARBITRATION BETWEEN

Instagram, LLC

1 Meta Way

Menlo Park, California 94025

United States of America

...Complainant

Versus

White Wolves LLC

30 N Gould St Ste R Sheridan

Wyoming 82801

United States of America

...Respondent

IN RESPECT OF DISPUTED DOMAIN NAME:

<instander.org.in>

INDRP Case No.: 2144

ARBITRATION AWARD

Date: August 5, 2026

Venue: Chennai



Raja Pannir Selvam
Sole Arbitrator



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Spelcham :-

1. THE PARTIES AND THEIR REPRESENTATIVES

1. Complainant

Instagram, LLC
1 Meta Way
Menlo Park, California 94025
United States of America

Authorized Representative:

David Taylor / Jane Seager
Hogan Lovells (Paris) LLP
17 avenue Matignon 75008
Paris, France
Telephone: +33 1 53 67 47 47
Email: domaindisputes@hoganlovells.com

2. Respondent

White Wolves LLC
30 N Gould St Ste R Sheridan
Wyoming 82801
United States of America
Email: anninekhan789@gmail.com

2. THE DOMAIN NAME AND REGISTRAR

The disputed domain name <**instander.org.in**> is registered through the Registrar Name.com, Inc., which is accredited by the .IN Registry (NIXI). The WHOIS details provided by NIXI identify the Respondent as the registrant of the disputed domain name.

3. PROCEDURAL HISTORY

- i. The Complainant filed the present Complaint under the .IN Domain Name Dispute Resolution Policy (INDRP) in respect of the disputed domain name <**instander.org.in**> on June 25, 2026.
- ii. The National Internet Exchange of India (NIXI) appointed Mr. Raja Pannir Selvam as the Sole Arbitrator in the present matter on July 1, 2026, and the matter was formally handed over to the undersigned on the same date.
- iii. Upon entering reference, the Sole Arbitrator issued a Notice to the Respondent under Rule 5(c) of the INDRP Rules of Procedure on July 1, 2026, directing the Complainant to serve a complete copy of the Complaint along with all annexures upon the Respondent and to furnish proof of service.
- iv. In compliance with the directions of the Tribunal, the Complainant served the Complaint along with annexures upon the Respondent by electronic mail on July 21, 2026, at the email address reflected in the WHOIS records, and also dispatched a

R. Pannir Selvam

physical copy of the Complaint along with annexures to the Respondent by courier on July 21, 2026, which was delivered on July 31, 2026.

- v. The Respondent was granted time to file its Reply to the Complaint within 15 (fifteen) days from the date of receipt of the Notice. Despite valid service of notice and expiry of the prescribed timeline, the Respondent failed to file any Reply or make any submission in the present proceedings.
- vi. In view of the Respondent's failure to appear or contest the proceedings, the Tribunal proceeded to adjudicate the matter ex-parte, on the basis of the pleadings and material available on record, in accordance with the INDRP Policy and Rules of Procedure.

4. COMPLAINANT'S CONTENTIONS

It is contended by the Complainant that:

- i. The Complainant, Instagram, LLC, commonly referred to as "Insta", is a world-renowned online photo and video sharing social networking application. Acquired by Facebook, Inc. (now Meta Platforms, Inc.) in 2012, Instagram is one of the world's fastest growing social networking platforms, with more than 3 billion monthly active accounts worldwide.
- ii. The Complainant has consistently ranked amongst the top mobile applications for iOS and Android operating systems and is among the most downloaded applications worldwide.
- iii. The Complainant's exponential growth and popularity, including in India, has been widely reported by technology publications and major international media. The term "INSTA" has also become widely recognized as referring to the Complainant and its INSTAGRAM platform.
- iv. The Complainant is the registered proprietor of numerous trademark registrations for INSTA and INSTAGRAM, including registrations in India and various other jurisdictions. The Complainant also owns registrations for its figurative Instagram logo.
- v. The Complainant is the owner of numerous domain names incorporating its INSTAGRAM trademark under various generic and country code top-level domains, all of which predate the registration of the disputed domain name.
- vi. The disputed domain name <instander.org.in> was registered on December 26, 2024, and incorporates the Complainant's INSTA trademark followed by the letters "nder".
- vii. The disputed domain name resolves to a website titled "Instander APK Download for Android", which purports to offer for download a modified APK version of the Instagram application providing additional functionality beyond that available in the official Instagram application, including ad-free browsing, downloading images and videos, and enhanced privacy settings.
- viii. The Respondent's website makes prominent reference to the Complainant's INSTAGRAM trademarks, features logos similar to the Complainant's Instagram logo and figurative trademark, including as a favicon, and adopts a colour scheme similar to that used by the Complainant.



- ix. Although the Respondent's website contains a disclaimer stating that it is not affiliated with Instagram or Meta Platforms, such disclaimer appears only on the "Terms" page and does not dispel the overall impression of association created by the Respondent's use of the Complainant's trademarks, logos and overall presentation.
- x. The disputed domain name incorporates the Complainant's INSTA trademark in its entirety. The addition of the letters "nder" does not prevent a finding of confusing similarity, as the Complainant's trademark remains clearly recognizable within the disputed domain name.
- xi. The country code top-level domain ".org.in" is merely a technical requirement of registration and does not distinguish the disputed domain name from the Complainant's trademark.
- xii. The Respondent has never been licensed, authorised or otherwise permitted by the Complainant to use the INSTA or INSTAGRAM trademarks in a domain name or in any other manner.
- xiii. The Respondent is not using the disputed domain name in connection with a bona fide offering of goods or services. Instead, the disputed domain name is used to offer an unauthorized modified APK version of the Complainant's Instagram application.
- xiv. The Respondent is not commonly known by the disputed domain name. The name White Wolves LLC bears no resemblance to the disputed domain name, nor has the Respondent secured or sought to secure any trademark rights in the expressions INSTA, INSTAGRAM, INSTANDER, or any variation thereof.
- xv. The Respondent cannot claim legitimate non-commercial or fair use of the disputed domain name since it uses the Complainant's trademarks, modified logos and similar visual presentation to create a false impression of association with the Complainant while promoting an unauthorized modified version of the Instagram application.
- xvi. The Complainant submits that the Respondent is seeking to derive commercial or reputational advantage by exploiting the goodwill associated with the Complainant's well-known trademarks.
- xvii. The Complainant's INSTA and INSTAGRAM trademarks had acquired substantial goodwill and reputation long before registration of the disputed domain name, and the Respondent could not credibly claim to have been unaware of the Complainant's rights at the time of registration.
- xviii. The Respondent's website clearly targets the Complainant by prominently displaying the Complainant's trademarks, modified versions of the Instagram logo and figurative mark, and a colour scheme similar to that of the Complainant's platform.
- xix. The Respondent has previously been involved in domain name disputes concerning domain names incorporating the trademarks of the Complainant and its related company, WhatsApp LLC, demonstrating a pattern of registering domain names targeting well-known trademarks.
- xx. The Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of the Respondent's website and the services offered thereon.



- xxi. The Respondent's use of the disputed domain name to provide an unauthorized modified version of the Instagram application is also likely to disrupt the Complainant's business and place the privacy and security of Instagram users at risk.
- xxii. The disputed domain name was registered and is being used in bad faith and is liable to be transferred to the Complainant under the provisions of the INDRP Policy.

5. RESPONDENT'S CONTENTION

Despite service of the Arbitration Notice dated July 1, 2026, the Respondent has failed to file any Reply or Detailed Statement to the Complaint within 15 (fifteen) days from the date of receipt of notice.

Pursuant to the directions of the Sole Arbitrator, the Complainant thereafter served a copy of the Complaint along with all supporting annexures upon the Respondent by email on July 21, 2026 at the email address reflected in the WHOIS records.

In addition, the Complainant also dispatched a physical copy of the Complaint along with annexures to the Respondent by courier on July 21, 2026. The courier tracking records placed on record show that the said physical copy was successfully delivered to the Respondent on July 31, 2026.

Notwithstanding the foregoing, and despite having received the Arbitration Notice as well as both the electronic and physical copies of the Complaint and annexures, the Respondent has not submitted a response.

Accordingly, the Respondent was afforded sufficient opportunity to present its case but has chosen not to do so.

In view of the absence of any reply from the Respondent, the present proceedings are conducted ex-parte. However, even in an uncontested matter, the Complainant must stand on its own merits and is required to establish each of the three elements as prescribed under Clause 4 of the INDRP Policy. No adverse inference can be drawn merely on account of the Respondent's non-appearance.

The disputed domain name <instander.org.in> is registered in the name of the Respondent on December 26, 2024. The material placed on record shows that the disputed domain name resolves to a website titled "Instander APK Download for Android", which purports to offer for download an unauthorized modified APK version of the Complainant's Instagram application. The website prominently displays the Complainant's INSTAGRAM trademarks, logos similar to the Complainant's figurative trademark, and a colour scheme similar to that of the Complainant. There is **no material on record to demonstrate any bona fide or legitimate use of the disputed domain name** by the Respondent independent of the Complainant's trademark rights.



6. DISCUSSION AND FINDINGS

The Complainant relies upon Paragraph 4 of the INDRP Policy and is required to establish that:

- a) the disputed domain name is identical or confusingly similar to a trademark in which the Complainant has rights; and
- b) the Respondent has no rights or legitimate interests in respect of the domain name; and
- c) the Registrant's domain name has been registered or is being used in bad faith.

The Tribunal has examined the Complaint, documents on record, and the legal submissions advanced by the Complainant, including reliance placed on prior INDRP, UDRP and WIPO decisions and judicial precedents, and proceeds to record its findings under each of the three heads set out in Paragraph 4 of the INDRP Policy.

The findings recorded hereinafter are based on an assessment of the facts pleaded, the evidence placed on record, and the settled principles governing domain name disputes under the INDRP and are not based merely on the non-appearance of the Respondent.

The Tribunal now proceeds to examine, in detail, whether the Complainant has satisfied the requirements under Paragraph 4(a) of the INDRP Policy.

a) Identical or Confusingly Similar

- i. The Complainant has established substantial rights in the trademarks INSTA and INSTAGRAM through numerous trademark registrations in India and various jurisdictions, extensive use and substantial worldwide reputation.
- ii. The material placed on record demonstrates that the Complainant's Instagram platform has acquired considerable goodwill and recognition internationally, including in India, and that the term "INSTA" is widely recognized as referring to the Complainant and its services.
- iii. The disputed domain name <instander.org.in> incorporates the Complainant's INSTA trademark in its entirety. The incorporation of a complainant's trademark in its entirety is ordinarily sufficient to support a finding of confusing similarity where the mark remains clearly recognizable within the disputed domain name.
- iv. The Complainant has further relied upon *Instagram, LLC v. Fatima Rasheed (WIPO Case No. D2025-2519)*, wherein a domain name incorporating the Complainant's INSTA mark together with additional letters was held to be confusingly similar to the Complainant's trademark. The principle enunciated therein is apposite to the facts of the present case, as the Complainant's trademark remains readily identifiable within the disputed domain name.
- v. The only additional element is the suffix "nder", which neither alters the visual, phonetic nor conceptual impression created by the dominant element "INSTA". The addition of such non-distinctive letters is insufficient to distinguish the disputed domain name from the Complainant's trademark.
- vi. An ordinary Internet user encountering the disputed domain name is likely to perceive it as a variation, extension or derivative of the Complainant's INSTA mark, thereby



giving rise to a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the website to which the disputed domain name resolves. The country code top-level domain ".org.in" is merely a technical requirement of registration and is irrelevant while assessing confusing similarity.

- vii. The Complainant has also relied upon *Google LLC v. Hom Kit Bk Picture (INDRP/1814)* to submit that the country code top-level domain ".org.in" is merely a technical requirement of registration and is irrelevant for determining confusing similarity.
- viii. Having considered the disputed domain name as a whole, the Tribunal finds that the Complainant's trademark INSTA remains the dominant and readily recognizable component thereof. The addition of the suffix "nder" does not dispel the confusing similarity between the disputed domain name and the Complainant's trademark. Accordingly, the Tribunal holds that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights.

Accordingly, the Complainant has satisfied the requirement under Clause 4(a)(i) of the INDRP Policy.

b) Rights or Legitimate Interests

- i. The Complainant has asserted that it has never licensed, authorised or otherwise permitted the Respondent to use the INSTA or INSTAGRAM trademarks in any manner whatsoever.
- ii. In support of the aforesaid contention, the Complainant has relied upon *Wacom Co. Ltd. v. Liheng (INDRP/634)*, wherein it was held that once a complainant establishes a prima facie case that the respondent lacks rights or legitimate interests, the burden shifts upon the respondent to rebut the same.
- iii. On the basis of the material placed on record, the Tribunal is satisfied that the Complainant has established a prima facie case that the Respondent lacks any rights or legitimate interests in the disputed domain name.
- iv. The Respondent is not affiliated with the Complainant in any manner and has never been authorised or licensed to use the Complainant's trademarks.
- v. The evidence on record shows that the disputed domain name resolves to a website offering an unauthorized modified APK version of the Instagram application.
- vi. The website prominently displays the Complainant's INSTAGRAM trademarks, logos similar to the Complainant's figurative trademark and adopts a colour scheme similar to that of the Complainant's platform, thereby conveying an overall commercial impression suggestive of an association with the Complainant.
- vii. The Complainant has relied upon *Instagram, LLC v. GB Apps (WIPO Case No. D2024-2405)*, *Instagram, LLC v. dileep yadav (WIPO Case No. D2023-3227)*, and *Instagram, LLC v. Adila Ayaz (WIPO Case No. D2025-0950)*, wherein use of the Complainant's trademarks in connection with unauthorized modified APK applications was held not to constitute a bona fide offering of goods or services. The factual matrix of the present case

Sp. Chairman →

is materially similar, and the rationale underlying the aforesaid decisions is equally applicable.

- viii. The Respondent's use of the disputed domain name is therefore not in connection with a bona fide offering of goods or services.
- ix. The Respondent is not commonly known by the disputed domain name. The name White Wolves LLC bears no resemblance to the disputed domain name, nor is there any material to indicate that the Respondent has acquired any rights in the expressions INSTA, INSTAGRAM, or INSTANDER.
- x. The Respondent cannot claim legitimate non-commercial or fair use of the disputed domain name since the material placed on record demonstrates use of the Complainant's trademarks and branding in a manner likely to create an impression of association with the Complainant.
- xi. Once the Complainant established a prima facie case, the evidentiary burden shifted to the Respondent to demonstrate rights or legitimate interests in the disputed domain name. Despite having been afforded sufficient opportunity, the Respondent has neither filed a Reply nor produced any evidence to rebut the Complainant's case.
- xii. In the absence of any material demonstrating that the Respondent has been commonly known by the disputed domain name, has made a bona fide offering of goods or services, or has engaged in any legitimate non-commercial or fair use thereof, the Tribunal finds that the Respondent has no rights or legitimate interests in the disputed domain name.

In view of the above, the Complainant has satisfied the requirements set out under Clause 4(a)(ii) of the INDRP Policy.

c) Registration and Use in Bad Faith

- i. The Complainant's INSTA and INSTAGRAM trademarks are distinctive and enjoy substantial worldwide reputation.
- ii. The Complainant has relied upon *Instagram LLC v. GB Apps (INDRP/1889)* and *Instagram, LLC v. Van Nam Tran (WIPO Case No. D2024-1576)* in support of its contention that the reputation of the Complainant's trademarks is such that the Respondent could not reasonably have been unaware of the Complainant's rights while registering the disputed domain name. Having regard to the extensive reputation and long-standing use of the Complainant's trademarks, the Tribunal finds it improbable that the Respondent registered the disputed domain name without knowledge of the Complainant's rights.
- iii. The Complainant's trademark rights substantially predate the registration of the disputed domain name.
- iv. The disputed domain name incorporates the Complainant's distinctive INSTA trademark in its entirety and is used in connection with a website offering an unauthorized modified version of the Complainant's Instagram application. These circumstances support the inference that the Respondent deliberately selected the disputed domain name with the Complainant and its trademark firmly in mind.



- v. The Complainant submits that the Respondent could not credibly claim to have been unaware of the Complainant's rights at the time of registration of the disputed domain name.
- vi. The Respondent has registered a domain name incorporating the Complainant's INSTA trademark and has used the same for a website offering an unauthorized modified APK version of the Instagram application.
- vii. The Complainant has relied upon *Instagram, LLC v. zeeshan khan (WIPO Case No. D2023-3228)* and *WhatsApp, Inc. v. Whois Agent, et al. (WIPO Case No. D2016-2299)* in support of its contention that the Respondent has intentionally attempted to attract Internet users by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of its website and the services offered therein.
- viii. The Respondent's website prominently features the Complainant's INSTAGRAM trademarks, logos similar to the Complainant's figurative trademark, and a colour scheme similar to that of the Complainant's platform, thereby creating a likelihood of confusion amongst Internet users. The overall presentation of the website reinforces the impression that the Respondent intended to capitalise on the goodwill associated with the Complainant's trademarks in order to attract Internet traffic.
- ix. The Complainant has also relied upon *Instagram, LLC v. Protection of Private Person / Yurii Shemetilo (WIPO Case No. D2022-2832)* to contend that the presence of a disclaimer does not cure bad faith where the domain name itself is inherently misleading.
- x. The disclaimer appearing on the Respondent's website does not negate the overall impression created by the Respondent's use of the Complainant's trademarks and branding.
- xi. The Tribunal is therefore satisfied that the Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of the website and the services offered thereon. Such conduct constitutes evidence of bad faith within the meaning of the INDRP Policy.
- xii. The Respondent has intentionally attempted to attract Internet users to its website by creating a likelihood of confusion with the Complainant's trademarks as to the source, sponsorship, affiliation or endorsement of the Respondent's website and the services offered thereon.
- xiii. The Complainant has further relied upon *WhatsApp LLC v. White Wolves LLC (WIPO Case No. D2025-3500)* and *Instagram, LLC v. Aaron Choi and White Wolves LLC (WIPO Case No. D2026-1180)*, involving the same Respondent, to establish a pattern of abusive domain name registrations targeting well-known trademarks. While each dispute must be decided on its own facts, the existence of previous proceedings involving the same Respondent lends support to the Complainant's contention that the registration of the disputed domain name forms part of a pattern of conduct directed against well-known trademarks.



- xiv. The Respondent's use of the disputed domain name to offer an unauthorized modified version of the Instagram application is also capable of disrupting the Complainant's business and placing the privacy and security of users at risk.
- xv. The Complainant has further relied upon *Instagram, LLC v. Private WhoIs, Global Domain Privacy Services Inc / Aleksandr Lyahevich, Private Person (WIPO Case No. D2021-0463)* in support of its contention that unauthorized modified versions of the Instagram application are likely to place the privacy and security of users at risk.
- xvi. The Complainant has additionally relied upon *Instagram, LLC v. Adila Ayaz (WIPO Case No. D2025-1119)* and *WhatsApp LLC v. Muhammad Ukasha (WIPO Case No. D2024-4962)* in support of its contention that the Respondent derives commercial or reputational advantage through the downloading of the modified APK application and that such use is likely to disrupt the Complainant's business. The facts and evidence placed on record support the inference that the Respondent has sought to exploit the goodwill associated with the Complainant's trademarks for its own benefit by diverting Internet users to the Respondent's website.
- xvii. Having considered the totality of the circumstances, including the inclusion of the Complainant's well-known trademark in the disputed domain name, the nature of the Respondent's website, the absence of any plausible legitimate explanation for such use, and the Respondent's failure to rebut the Complainant's case, the Tribunal is satisfied that the disputed domain name was registered and is being used in bad faith within the meaning of Clause 4(a)(iii) of the INDRP Policy.

Accordingly, the Complainant has satisfied the requirement under Clause 4(a)(iii) of the INDRP Policy.

7. DECISION

In view of the foregoing findings, namely that the disputed domain name is confusingly similar to a trademark in which the Complainant has rights, that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and that the disputed domain name has been registered and is being used in bad faith, the Complaint is allowed.

The National Internet Exchange of India (NIXI) is directed to transfer the domain name <instander.org.in> to the Complainant, Instagram, LLC.

There shall be no order as to costs.

Place: Chennai

Date: August 5, 2026



Raja Pannir Selvam
Sole Arbitrator

