ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Hanson Bridgett LLP v. jake alex
Case No. D2025-3657

1. The Parties

The Complainant is Hanson Bridgett LLP, United States of America ("United States"), represented internally.

The Respondent is jake alex, United States.

2. The Domain Name and Registrar

The disputed domain name <hansonbrdgett.com> (the "Disputed Domain Name") is registered with Hostinger Operations, UAB (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 10, 2025. On September 10, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On September 12, 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 (Domain Admin, Privacy Protect, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 12, 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 amended Complaint on September 17, 2025.

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 of the Complaint, and the proceedings commenced on September 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 20, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on October 24, 2025.

The Center appointed Lynda M. Braun as the sole panelist in this matter on November 3, 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.

4. Factual Background

The Complainant is a law firm headquartered in San Francisco, California, United States that employs over 200 attorneys in offices across several cities in California. Founded in 1958, the Complainant offers its legal services to thousands of clients across the state of California and supports a variety of multi-jurisdictional practices there.

The Complaint states that through the longstanding and continuous use of the common law HANSON BRIDGETT trademark (the "HANSON BRIDGETT Mark"), the Complainant has garnered significant consumer recognition and common law trademark rights, which are enforceable in the United States pursuant to Section 43(a) of the Lanham Act. The Complainant has used the HANSON BRIDGETT trademark continuously and exclusively since 1958 in the United States as an indicator of source in connection with the Complainant's legal services. Thus, the Complainant claims that by virtue of the widespread use and promotion of its HANSON BRIDGETT trademark, it has become well known as representing the Complainant and its goods and services.

The Complainant owns the domain name <hansonbridgett.com>, registered in November 1997, and which resolves to its official website at "www.hansonbridgett.com". The Complainant also uses the domain name to create email addresses for its lawyers and other staff.

The Disputed Domain Name was registered on August 27, 2025, and resolves to a parked page of the Registrar. The Respondent also configured the Disputed Domain Name for email functions and used the email address incorporating the Disputed Domain Name, albeit with a deletion of the letter "i" in the term "bridgett", presumably to impersonate the Complainant. and purportedly send fraudulent emails to the Complainant's clients. [1] The Complainant submitted a document as an Annex to the Complaint indicating that Mail Exchanger ("MX") records were configured and email services were being provided for the Disputed Domain Name by services provider "Zoho" on behalf of the Respondent.

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 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 confusingly similar to the Complainant's trademark;

- the Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and

- the Disputed Domain Name was registered and is being used in bad faith.

[1] The Complainant did not provide evidence of a fraudulent email scheme, but the Respondent has not submitted any arguments or evidence to rebut the Complainant's allegations.

The Complainant seeks the transfer of the Disputed Domain Name from the Respondent to the Complainant in accordance with paragraph 4(i) of the Policy.

B. Respondent

The Respondent did not reply to the Complainant's contentions.

6. Discussion and Findings

Paragraph 4(a) of the Policy requires that the Complainant prove the following three elements in order to prevail in these proceedings:

(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 was registered and is being used in bad faith.

A. Identical or Confusingly Similar

Paragraph 4(a)(i) of the Policy requires a two-fold inquiry: a threshold investigation into whether a complainant has rights in a trademark, followed by an assessment of whether the disputed domain name is identical or confusingly similar to that trademark.

The Panel concludes that in the present case, the Disputed Domain Name is confusingly similar to the HANSON BRIDGETT Mark, differing only by the misspelling of the HANSON BRIDGETT Mark by deleting the letter "i" after the letter "r" in the term "bridgett", and then followed by the generic Top-Level Domain ("gTLD") ".com".

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.

It is uncontroverted that the Complainant has established rights in the HANSON BRIDGETT common law trademark based on its almost seventy years of continuous use, which the Complainant has established for purposes of the Policy. The consensus view is that an unregistered mark satisfies the threshold requirement of having trademark rights for purposes of standing to file a UDRP case. See WIPO Overview 3.0, sections 1.2 and 1.3. In the Panel's view, paragraph 4(a)(i) of the Policy refers to a "trademark or service mark" in which the complainant has rights and does not expressly limit the application of the Policy to a registered trademark or service mark. Therefore, the fact that in this case the Complainant did not have a registered trademark for the HANSON BRIDGETT Mark does not preclude a finding that it has established trademark or service mark rights. See *Imperial College v. Christophe Dessimoz*, WIPO Case No. D2004-0322.

The Disputed Domain Name consists of the HANSON BRIDGETT Mark in its entirety, albeit misspelled with the deletion of the letter "i" after the letter "r" in the trademark. Such a minor modification to a trademark is commonly referred to as "typosquatting" and seeks to wrongfully take advantage of errors by a user in typing a domain name into a web browser. The misspelling of "hanson bridgett" to "hanson brdgett" does not prevent a finding of confusing similarity of the Disputed Domain Name to the HANSON BRIDGETT Mark. See WIPO Overview 3.0, section 1.9: "A domain name which consists of a common, obvious, or intentional misspelling of a trademark is considered by panels to be confusingly similar to the relevant mark for purposes of the first element"; see also *Express Scripts, Inc. v. Whois Privacy Protection Service, Inc. / Domaindeals, Domain Administrator*, WIPO Case No. D2008-1302; and *Singapore Press Holdings Limited*

v. Leong Meng Yew, WIPO Case No. D2009-1080.

Finally, the addition of a gTLD such as ".com" in a domain name is a technical requirement. Thus, it is well established that, as here, such element may typically be disregarded when assessing whether a domain name is identical or confusingly similar to a trademark. See *Proactiva Medio Ambiente, S.A. v. Proactiva*, WIPO Case No. D2012-0182 and WIPO Overview 3.0, section 1.11.1. Thus, the Panel finds that the Disputed Domain Name is confusingly similar to the Complainant's HANSON BRIDGETT Mark.

Based on the available record, the Panel finds that 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 a 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 that 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. WIPO Overview 3.0, section 2.1.

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. 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.

The Complainant's prima facie case includes the fact that the Complainant has not authorized, licensed or otherwise permitted the Respondent to use the HANSON BRIDGETT Mark, that there is no evidence that the Respondent is commonly known by the Disputed Domain Name or by any similar name, and that there is no evidence that the Respondent was using or making demonstrable preparations to use the Disputed Domain Name in connection with a bona fide offering of goods or services. See Policy, paragraph 4(c). Moreover, based on the use made of the Disputed Domain Name to configure email capability as evidenced by the MX records discovered by the Complainant, the Panel finds that the Respondent is not making a bona fide offering of goods or services nor making a legitimate noncommercial or fair use of the Disputed Domain Name under the circumstances of the case. See *Lego Juris A/S v. Nofel Izz, JID*, WIPO Case No. D2019-2601.

Moreover, although the record here does not contain evidence of a phishing scheme, the configuration of MX records presents the possibility of such a scheme in which the Respondent attempts to impersonate the Complainant. See, e.g., *IPSOS v. Ipsos Market, ipsosmarketsurvey*, WIPO Case No. D2023-2856 ("The record in this case contains no evidence of illegal behavior, but the configuration of MX records presents the potential for an email phishing scheme impersonating Complainant."); *JCDecaux SA v. Sozinho Basilio*, WIPO Case No. D2022-4365 ("The fact that MX servers have been configured with respect to the disputed domain name suggests that the disputed domain name . . . is actively being used for email purposes.").

In sum, the Panel concludes that the Complainant has established an unrebutted prima facie case that the Respondent lacks rights or legitimate interests in the Disputed Domain Name. Rather, the Panel finds that the Respondent is using the Disputed Domain Name for commercial gain with the intent to mislead by potentially defrauding the Complainant's clients by incorporating the Disputed Domain Name into emails sent by the Respondent. Such use cannot conceivably constitute a bona fide offering of a product or service

within the meaning of paragraph 4(c)(i) of the Policy.

Based on the available record, the Panel finds that 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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith. The Panel finds that based on the record, the Complainant has demonstrated the existence of the Respondent's bad faith registration and use of the Disputed Domain Name, but other circumstances may be relevant in assessing whether a respondent's registration and use of a domain name is in bad faith. WIPO Overview 3.0, section 3.2.1.

First, based on the circumstances here, the Panel concludes, on the balance of probabilities, that the Respondent's registration and use of the Disputed Domain Name had been done for the purpose of trading on the name and reputation of the Complainant and its HANSON BRIDGETT Mark. See *Madonna Ciccone, p/k/a Madonna v. Dan Parisi and "Madonna.com"*, WIPO Case No. D2000-0847 ("[t]he only plausible explanation for Respondent's actions appears to be an intentional effort to trade upon the fame of Complainant's name and mark for commercial gain").

Second, since the HANSON BRIDGETT Mark was used by the Complainant since 1958, far in advance of the Respondent's registration of the Disputed Domain Name which is itself nearly identical to the Complainant's official domain name <hansonbridgett.com>, it is nearly implausible that the Respondent created the Disputed Domain Name independently. Therefore, the Panel finds it likely that the Respondent had the Complainant's HANSON BRIDGETT Mark in mind when registering the Disputed Domain Name, especially since the mark is recognizable despite its misspelling, demonstrating bad faith. In sum, UDRP panels have found that the registration of a disputed domain name that is confusingly similar to a well-known trademark (particularly disputed domain names comprising typos) by an unaffiliated entity can create a presumption of bad faith. See WIPO Overview 3.0, section 3.1.4.

Third, the Complainant alleged that the Respondent activated MX records associated with the Disputed Domain Name, possibly in an attempt to perpetuate a fraudulent phishing scheme to acquire personal and confidential information from users searching for the Complainant's website. The potential for this scheme creates a presumption of bad faith even though the Complainant did not submit any evidence that a phishing scheme had already taken place.

Finally, the Disputed Domain Name contains a misspelling of the HANSON BRIDGETT Mark, which further supports a finding of bad faith registration and use. See *Nutricia International BV v. Eric Starling*, WIPO Case No. D2015-0773.

Based on the available record, the Panel finds that the third element of the Policy has been established.

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 <hansonbrdgett.com> be transferred to the Complainant.

/Lynda M. Braun/
Lynda M. Braun
Sole Panelist
Date: November 12, 2025