

ADMINISTRATIVE PANEL DECISION

Reed Smith LLP v. Curtis Johnson
Case No. D2026-1032

1. The Parties

Complainant is Reed Smith LLP, United States of America, represented internally.

Respondent is Curtis Johnson, United States of America.

2. The Domain Name and Registrar

The Disputed Domain Name <reedsmithlp.com> is registered with Squarespace Domains II LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 10, 2026. On March 11, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Name. On March 11, 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 (UNKNOWN) and contact information in the Complaint. The Center sent an email communication to Complainant on March 12, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on March 13, 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”), 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 Respondent of the Complaint, and the proceedings commenced on March 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 5, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on April 9, 2026.

The Center appointed Richard W. Page as the sole panelist in this matter on April 15, 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

Since at least as early as 1902, Complainant has continuously used the Reed Smith name or the REED SMITH Mark throughout the world in connection with legal services. Complainant is a global law firm with more than 1,600 attorneys worldwide and 30 full-service legal offices across the United States of America, Europe, the Middle East, and Asia.

Complainant owns numerous registrations of the REED SMITH Mark in the United States of America and globally, including, without limitation, the following in the United States of America, the European Union, and the United Kingdom:

United States of America Registration No. 1,293,150 for REED SMITH registered on September 4, 1984, in international class 35;

European Union Registration No. 002212405 for REED SMITH registered on April 29, 2005, in international classes 35, 41 and 42; and

United Kingdom Registration No. 0090655418 for REED SMITH registered on June 9, 2008, in international classes 35, 41 and 42.

The United States of America registration has obtained incontestable status, meaning that the registration is conclusive evidence of Complainant's ownership in and exclusive right to use the REED SMITH Mark, and the validity of the same.

Complainant also maintains an active Internet presence and owns several domain names that contain the Reed Smith name and the REED SMITH Mark, which are accessible to consumers throughout the world including, without limitation, the following domain names: <reedsmithprivateequity.com> and <reedsmith-lawfirm.com>.

Complainant's websites serve as a primary marketing and informational tool and as a primary point of communication between Complainant and its current and prospective clients, employees, partners, and vendors. For example, the website located at "www.reedsmith.com/en" is Complainant's main corporate website that provides key information about the firm, its services, and career opportunities.

The Disputed Domain Name was registered on January 9, 2026, does not resolve to an active website, but is enrolled in a mail exchange (MX) allowing for the sending and receiving of email. The website at the Disputed Domain Name states "We're under construction. Please check back for an update soon".

5. Parties' Contentions

A. Complainant

Complainant contends that it has developed a global reputation as a leading law firm and has received numerous awards and much recognition over the years. Complainant further contends that it has expended significant time, money, and resources to promote its services using the REED SMITH Mark on social media, print and digital advertisements, Internet website, industry publications, presentations, webcasts, webinars, and other media and promotional materials. Complainant further contends that, as a result of its extensive marketing efforts and business success, Complainant has developed significant goodwill in the REED SMITH Mark.

Complainant further contends that the Disputed Domain Name includes the entirety of the REED SMITH Mark and includes an intentional misspelling of Complainant's name with the omission of the letter "L" in the limited liability partnership acronym (LLP). Complainant further contends that the Disputed Domain Name is confusingly similar to the REED SMITH Mark and is a classical case of typosquatting.

Complainant submits that, as recently as January 9, 2026, consumers have reported receiving phishing emails from email addresses associated with the Disputed Domain Name, such as "[]@reed smithlp.com". Complainant further submits that Respondent is using the Disputed Domain Name to impersonate Complainant and to carry out its phishing scheme to try to deceive consumers into disclosing sensitive information or transmitting money under false pretenses. Complainant further submits that these fraudulent emails were sent in further of a business email compromise scheme, whereby Respondent pretended to be associated with Complainant following an email breach. The phishing emails include Complainant's name in its entirety and an accompanying PDF that featured the REED SMITH Mark and logo and contain instructions to make payment to a bank account associated with Respondent.

Complainant further submits that Respondent is not related to, affiliated with, or connected to Complainant in any way. Complainant has never licensed or authorized Respondent to use the REED SMITH Mark or to register any domain name incorporating the REED SMITH Mark. Complainant further submits that there has been no actual or contemplated bona fide or legitimate use the Disputed Domain Name by Respondent. Complainant further submits that Respondent has exclusively used the Dispute Domain Name and associated email addresses with the phishing scheme to impersonate Complainant.

Complainant further submits that Respondent has never been known by the name "Reed Smith" and there are no legitimate websites associated with the Disputed Domain Name that provide any information about Respondent.

Complainant alleges that Respondent's only purpose in registering and using the Disputed Domain Name has been to conduct the fraudulent phishing scheme described above and is in bad faith.

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

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Paragraph 15(a) of the Rules instructs the Panel as to the principles the Panel is to use in determining the dispute: "A Panel shall decide a complaint on the basis of the statements and documents submitted in accordance with the Policy, these Rules, and any rules and principles of law that it deems applicable."

Even though Respondent has failed to file a Response or to contest Complainant's assertions, the Panel will review the evidence proffered by Complainant to verify that the three essential elements of the claims are met. WIPO Overview of WIPO Panel Views on UDRP Questions ("[WIPO Overview 3.1](#)"), section 4.3.

Paragraph 4(a) of the Policy directs that Complainant must prove each of the following three elements:

- i) that the Disputed Domain Name registered by Respondent is identical or confusingly similar to the REED SMITH Mark in which Complainant has rights; and,
- ii) that Respondent has no rights or legitimate interests in respect of the Disputed Domain Name; and,
- iii) that the Disputed Domain Name has been registered and is being used in bad faith.

A. Identical or Confusingly Similar

[WIPO Overview 3.1](#), section 1.2.1 states that registration of the REED SMITH Mark prima facie satisfies the threshold requirement of Complainant having trademark rights for purposes of standing to file a UDRP case.

Complainant has shown rights in respect of the REED SMITH Mark for the purposes of the Policy.

[WIPO Overview 3.1](#), section 1.2.1.

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 REED SMITH Mark and the Disputed Domain Name. [WIPO Overview 3.1](#), section 1.7.

The entirety of the REED SMITH Mark is reproduced within the Disputed Domain Name. Accordingly, the Disputed Domain Name is confusingly similar to the REED SMITH Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.7.

Although the addition of certain terms, here the letters “lp” (a misspelled acronym for limited liability company), may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the Disputed Domain Name and the REED SMITH Mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.8.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Paragraph 4(c) of the Policy allows three nonexclusive methods for the Panel to conclude that Respondent has rights or a legitimate interest in the Disputed Domain Name:

- (i) before any notice to you [Respondent] of the dispute, your 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) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Disputed Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are 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 REED SMITH Mark.

Although the overall burden of proof in UDRP proceedings is on Complainant, panels have recognized that proving that 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 Respondent. As such, where Complainant makes out a prima facie case that Respondent lacks rights or legitimate interests, the burden of production on this element shifts to Respondent to come forward with relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Name (although the burden of proof always remains on Complainant). If Respondent fails to come forward with such relevant evidence, Complainant is deemed to have satisfied the second element. [WIPO Overview 3.1](#), section 2.1.

Having reviewed the available record, the Panel finds Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the Disputed Domain Name. Respondent has not rebutted 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.

Panels have held that the use of the Disputed Domain Name for illegitimate activity, here claimed as impersonation and phishing, can never confer rights or legitimate interests on a respondent.

[WIPO Overview 3.1](#), section 2.13.1.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy sets forth four nonexclusive criteria for Complainant to show bad faith registration and use of the Disputed Domain Name:

(i) circumstances indicating that you [Respondent] have registered or you have acquired the Disputed Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Disputed Domain Name registration to Complainant who is the owner of the REED SMITH Mark or to a competitor of Complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the Disputed Domain Name; or

(ii) you [Respondent] have registered the Disputed Domain Name in order to prevent the owner of the REED SMITH Mark from reflecting the REED SMITH Mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or

(iii) you [Respondent] have registered the Disputed Domain Name primarily for the purpose of disrupting the business of a competitor; or

(iv) by using the Disputed Domain Name, you [Respondent] have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the REED SMITH Mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product on your website or location.

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 the Disputed Domain Name in bad faith.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that the Disputed Domain Name was registered and used in bad faith, but other circumstances may be relevant in assessing whether Respondent's registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1.

Panels have held that the use of a domain name for purposes other than to host a website may constitute bad faith. Such active ("behind the scenes") uses are considered distinct from the passive holding doctrine discussed above, and can include a range of bad faith activity or scams such as sending email, phishing, identity theft, or malware distribution. (In some such cases, the respondent may even host a copycat version of the complainant's website.) Many such cases involve the respondent's use of the domain name to send deceptive emails, e.g., to obtain sensitive or confidential personal information from prospective job applicants, or to solicit payment of fraudulent invoices by the complainant's actual or prospective customers. [WIPO Overview 3.1](#), section 3.4.

Panels have held that the use of the Disputed Domain Name for illegitimate activity, here claimed as impersonation and phishing, constitutes bad faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds Respondent's registration and use of the Disputed Domain Name constitutes bad faith under the Policy.

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

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 <reedsmithlp.com> be transferred to Complainant.

/Richard W. Page/

Richard W. Page

Sole Panelist

Date: April 22, 2026