

ARBITRATION AND MEDIATION CENTER

# ADMINISTRATIVE PANEL DECISION

LinkedIn Corporation v. Karam Moore, Karam Jameel Moore Case No. D2025-2180

#### 1. The Parties

The Complainant is LinkedIn Corporation, United States of America ("U.S."), represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, U.S.

The Respondent is Karam Moore, Karam Jameel Moore, U.S.

#### 2. The Domain Name and Registrar

The disputed domain name < linkedin.baby > 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 June 4, 2025. On June 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On June 4, 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 (Registration Private / Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on June 5, 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 amendment to the Complaint on June 5, 2025.

The Center verified that the Complaint together with the amendment to the 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 June 10, 2025. In accordance with the Rules, paragraph 5, the due date for Response was June 30, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on July 1, 2025.

The Center appointed R. Eric Gaum as the sole panelist in this matter on July 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 one of the world's largest professional networks on the Internet, with more than 1 billion members in more than 200 countries and territories, including executives from a lot of Fortune 500 companies.

The Complainant owns numerous trademark registrations for the LINKEDIN trademark include the following (among many others):

- U.S. Reg. No. 3,074,241 for LINKEDIN for use in connection with, inter alia, "online business networking services" (registered March 28, 2006);
- U.S. Reg. No. 4,007,079 for LINKEDIN for use in connection with, inter alia, "social introduction and social networking services" (registered Aug. 2, 2011); and
- International Reg. No. 1,368,414 for LINKEDIN for use in connection with, inter alia, "educational services" (registered April 27, 2017).

The Complainant is also the registrant of numerous domain names, including linkedin.com>, which it registered on November 2, 2002, and which it uses in connection with its primary website.

The disputed domain name was registered on August 22, 2024. The disputed domain name redirects to a profile page on the Complainant's own website. According to the Complaint, at least two security vendors have reported that the disputed domain name is being used in connection with malicious or suspicious activities.

### 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 the following:

The Respondent redirects the disputed domain name to the Complainant's own website, specifically to a web page of a LinkedIn profile for "Karam (WawMart) Moore."

The Complainant's User Agreement (to which every user of the Complainant's services must agree), forbids users from "using the word 'LinkedIn' or our logos in any business name, email, or URL."

At least two security vendors have reported that the disputed domain name is being used in connection with malicious or suspicious activities, according to a report from VirusTotal, a service that analyzes files and URLs for viruses, worms, trojans and other kinds of malicious content.

The Complainant (or an affiliate) is the owner of at least 318 trademark registrations in at least 71 jurisdictions worldwide that consist of or include the mark LINKEDIN.

The disputed domain name is identical or confusingly similar to the LINKEDIN trademark. The relevant comparison to be made is with the second-level portion of the disputed domain name only (i.e., "linkedin"), as it is well-established that the Top-Level Domain name (i.e., ".baby") may be disregarded for this purpose.

The second-level portion of the disputed domain name contains the LINKEDIN trademark – and only the LINKEDIN trademark – in its entirety.

The Respondent has no rights or legitimate interests in the disputed domain name. The Complainant has never assigned, granted, licensed, sold, transferred or in any way authorized the Respondent to register or use the LINKEDIN trademark in any manner.

Because at least two security vendors have reported that the disputed domain name is associated with malicious or suspicious activities, the Respondent clearly has not used the disputed domain name "in connection with a bona fide offering of goods or services" and, therefore, cannot establish rights or legitimate interests pursuant to paragraph 4(c)(i) of the Policy, nor can Respondent establish rights or legitimate interests pursuant to paragraph 4(c)(iii) of the Policy.

By redirecting the disputed domain name to the Complainant's own website – specifically, to a web page of a LinkedIn profile for "Karam (WawMart) Moore" – the Respondent lacks rights or legitimate interests in the disputed domain name pursuant to paragraphs 4(c)(i) and 4(c)(iii) of the Policy.

Further, the Respondent has never used, or made preparations to use, the disputed domain name or any name corresponding to the disputed domain name in connection with a bona fide offering of goods or services, because the Respondent appears to be a user of the Complainant's services and is using the disputed domain name to redirect visitors to his own LinkedIn profile – which is in violation of section 8.2.7 of the Complainant's User Agreement.

To the Complainant's knowledge, the Respondent has never been commonly known by the disputed domain name and has never acquired any trademark or service mark rights in the disputed domain name. Therefore, the Respondent cannot establish rights or legitimate interests pursuant to paragraph 4(c)(ii) of the Policy.

The disputed domain name should be considered as having been registered and used in bad faith by the Respondent.

"[T]he mere registration of a domain name that is identical or confusingly similar... to a famous or widely-known trademark by an unaffiliated entity can by itself create a presumption of bad faith." WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 3.1.4. The LINKEDIN trademark is clearly famous and/or widely known, given that it is protected by at least 318 trademark registrations in at least 71 jurisdictions worldwide, the oldest of which was registered more than 19 years ago.

Given the global reach and popularity of the Complainant's services under the LINKEDIN trademark, "it is inconceivable that Respondent chose the contested domain name without knowledge of Complainant's activities and the name and trademark under which Complainant is doing business."

Moreover, given the Complainant's established rights in its trademarks and the fact that the disputed domain name is "so obviously connected with" the Complainant given its numerous registrations worldwide for the LINKEDIN trademark, the Respondent's actions suggest "opportunistic bad faith" in violation of the Policy.

In light of this long history of the Complainant's trademarks and the Complainant's significant international presence and brand recognition, "[i]t is likely that the Respondent knew of the Complainant's mark and has sought to obtain a commercial benefit by attracting Internet users based on that confusion."

#### B. Respondent

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

#### 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. <u>WIPO Overview 3.0</u>, section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. WIPO Overview 3.0, section 1.2.1. The entirety of the mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is identical to the mark for the purposes of the Policy. WIPO Overview 3.0, section 1.7; see also section 1.11.1 ("The applicable Top Level Domain ('TLD') in a domain name (e.g., '.com', '.club', '.nyc') is viewed as a standard registration requirement and as such is disregarded under the first element confusing similarity test.")

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. 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.

Moreover, the Panel considers that the composition of the disputed domain name carries a high risk of implied affiliation with the Complainant. <u>WIPO Overview 3.0</u>, section 2.5.1.

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.

In the present case, the Panel notes that the Respondent registered and is using the disputed domain name despite the Complainant and its trademarks being well-known, and where the Complainant's trademark registrations significantly predate the registration date of the disputed domain name. The Respondent also redirects the disputed domain name to the Complainant's own website – specifically, to a web page of a LinkedIn profile for "Karam (WawMart) Moore". Such use of the disputed domain name constitutes bad faith under the paragraph 4(b)(iv) of the Policy. Furthermore, at least two security vendors have reported that the

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disputed domain name is being used in connection with malicious or suspicious activities, according to a report from VirusTotal, a service that analyzes files and URLs for viruses, worms, trojans and other kinds of malicious content.

Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitutes bad faith under the Policy.

The Panel finds that the 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 linkedin.baby> be transferred to the Complainant.

/R. Eric Gaum/
R. Eric Gaum
Sole Panelist
Date: July 18, 2025