

ADMINISTRATIVE PANEL DECISION

Gibson, Dunn & Crutcher, LLP v. Jason Leonardo
Case No. D2025-2989

1. The Parties

Complainant is Gibson, Dunn & Crutcher, LLP, United States of America ("United States"), internally represented.

Respondent is Jason Leonardo, United States.

2. The Domain Name and Registrar

The disputed domain name <gibsondunn.com> is registered with NameSilo, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on July 25, 2025. On July 28, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On July 28, 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 named Respondent (Domain Administrator, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to Complainant on July 29, 2025, 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 August 3, 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 Respondent of the Complaint, and the proceedings commenced on August 5, 2025. In accordance with the Rules, paragraph 5(a), the due date for Response was August 25, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on August 26, 2025.

The Center appointed Georges Nahichevsky, Phillip V. Marano and Angela Fox as panelists in this matter on September 17, 2025. The Panel finds that it was properly constituted. Each member of 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 is an international law firm headquartered in Los Angeles, California, United States, with more than 2,000 attorneys in the United States and several jurisdictions around the world. Complainant has provided its legal services under the name and mark GIBSON DUNN since at least 1911 and owns a trademark registration for its GIBSON DUNN mark in the United States (Registration No. 2,614,712) that issued to registration on September 3, 2002. Complainant also owns and uses the domain name <gibsondunn.com> for a website that provides information concerning Complainant and its services.

Respondent is an individual who appears to be based in the United States. Respondent registered the disputed domain name on April 29, 2025. Respondent does not appear to have used the disputed domain name for an active website or page, but instead looks to have used the disputed domain name in connection with emails that impersonated Complainant and attorneys within Complainant's law firm. Currently, the disputed domain name resolves to a web page with click-through links.

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 it has strong rights in the GIBSON DUNN name and mark by virtue of its use with Complainant's legal services since at least 1911, Complainant's involvement in many high profile cases and Complainant's trademark registration for the GIBSON DUNN mark.

Complainant asserts that the disputed domain name is identical or confusingly similar to its GIBSON DUNN name and mark as it is a typo version of the GIBSON DUNN mark which merely replaces the letter "n" in "gibson" with the letter "m." Complainant contends that Respondent is engaged in typosquatting and that the disputed domain name is intended to confuse Internet users into believing that it belongs to Complainant.

Complainant argues that Respondent does not have any rights or legitimate interests in the disputed domain name and is acting in bad faith as Respondent is not affiliated with Complainant and has no license or authorization to use the GIBSON DUNN mark. Complainant also argues that because Respondent registered a typo version of the GIBSON DUNN mark, Respondent cannot have a legitimate interest in the disputed domain name. Finally, Complainant asserts that Respondent is not using the disputed domain name for a bona fide offering of goods or services. Complainant maintains that Respondent has used the disputed domain name to send emails impersonating one of its attorneys as part of a phishing campaign aimed at obtaining a transfer of a fee payment to be made to Complainant.

Complainant contends that Respondent has registered and uses the disputed domain name in bad faith as the disputed domain name is essentially identical to the GIBSON DUNN mark and there is no legitimate reason for Respondent to have registered such given the fame of Complainant and the existence of its website at <gibsondunn.com>. Complainant also contends that Respondent has acted in bad faith by using the disputed domain name for a phishing scheme "designed to defraud Complainant's clients for commercial gain utilizing Complainant's name, address, and the names of its attorneys and employees."

B. Respondent

Respondent did not reply to Complainant's contentions.

6. Discussion and Findings

Under paragraph 4(a) of the Policy, to succeed Complainant must satisfy the Panel that:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which Complainant has rights;
- (ii) 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

Ownership of a trademark registration is generally sufficient evidence that a complainant has the requisite rights in a mark for purposes of paragraph 4(a)(i) of the Policy. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ([“WIPO Overview 3.0”](#)) at section 1.7. Complainant has provided evidence that it owns a trademark registration for the GIBSON DUNN mark and that such issued to registration well before Respondent registered the disputed domain name.

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 Complainant’s trademark and the disputed domain name. *Id.*

Here, the disputed domain name is nothing more than a typo version of the GIBSON DUNN mark that merely replaces the letter “n” in “gibson” with the letter “m.” Such substitution of one letter in the disputed domain name does not prevent a finding of confusing similarity as the disputed domain name is nothing more than an intentional misspelling of the GIBSON DUNN mark. Accordingly, the disputed domain name is confusingly similar to Complainant’s GIBSON DUNN mark for purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

The Panel thus 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 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 that 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 names such as those enumerated in the Policy or otherwise.

Respondent’s registration of the disputed domain name (coupled with its use) that is clearly based on the GIBSON DUNN mark does not seem coincidental, particularly as it is simply a typo version of that mark. Given that Respondent has failed to appear in this matter, such typosquatting is, in and of itself, evidence

that Respondent lacks rights or legitimate interests in the disputed domain name. Additionally, in view of the evidence submitted by Complainant showing that Respondent has used the disputed domain to send emails that impersonate Complainant and its employees in a potential effort to divert payments to be made to Complainant, there can be no basis for Respondent to claim a legitimate interest in or a bona fide use of the disputed domain name. Panels have consistently held that the use of a domain name for illegal activity, here impersonating Complainant in emails as part of a phishing scheme, can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

The Panel thus 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 view of Respondent's actions, and failure to appear in these proceedings, it seems more likely than not that Respondent's registration and use of the disputed domain name has been done opportunistically and in bad faith for Respondent's benefit or profit. Respondent's bad faith is underscored by Respondent's registration of a typo version of the GIBSON DUNN mark and the use of such, per the evidence submitted by Complainant, for emails impersonating Complainant and its employees as part of a fraudulent scheme to divert payments to be made to Complainant. WIPO Overview 3.4. In all, Respondent was undoubtedly aware of Complainant and its GIBSON DUNN name and mark when it registered the disputed domain name in furtherance of its fraudulent scheme.

The Panel thus 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, <gibsomdunn.com> be transferred to Complainant.

/Georges Nahitchevansky/
Georges Nahitchevansky
Presiding Panelist

/Phillip V. Marano/
Phillip V. Marano
Panelist

/Angela Fox/
Angela Fox
Panelist
Date: October 1, 2025