

ADMINISTRATIVE PANEL DECISION

LinkedIn Corporation v. Eldo Roshi, Codeless
Case No. D2025-3086

1. The Parties

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

The Respondent is Eldo Roshi, Codeless, Albania.

2. The Domain Name and Registrar

The disputed domain name <crossclimb-game.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on August 2, 2025. On August 4, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 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 (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on August 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 August 8, 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 August 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on September 2, 2025.

The Center appointed Karen Fong as the sole panelist in this matter on September 8, 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

Founded in 2003, the Complainant is the world's largest professional network on the Internet. With more than one billion members across over 200 countries and regions, it employs more than 18,000 people in 38 offices worldwide and operates websites in 36 languages. The Complainant became a public company in May 2011, listed on the New York Stock Exchange, and was acquired by Microsoft Corporation in 2016 in a transaction valued at USD 26.2 billion.

In addition to its networking services, the Complainant also offers a number of games on its website at the domain name <linkedin.com>. One such game is CROSSCLIMB (the "Game"), announced on April 30, 2024, and accessible at "www.linkedin.com/games/crossclimb". The Game is described by the Complainant as "a trivia game from LinkedIn News inspired by a mini crossword – but with a twist! Answer each clue, then organize the rows into a word ladder, where each word is just one letter different from the one before or after it. That will unlock the top and bottom rows for the combo clue to complete the ladder".

The Complainant applied to register the CROSSCLIMB trade mark in the United States on March 31, 2024. The mark proceeded to registration on July 15, 2025, under United States Trade Mark Registration No. 7869318 (the "Trade Mark").

The Respondent, who appears to be based in Albania, registered the disputed domain name on May 2, 2024, just two days after the Complainant announced the Game. The website to which the disputed domain name resolved (the "Website") initially offered a game almost identical to the Game and displayed the statement: "CrossClimb LinkedIn Game – Play Unlimited. A word ladder puzzle inspired by LinkedIn's daily game – with unlimited plays!"

On July 8, 2025, the Complainant sent the Respondent a cease-and-desist letter. Following this, the Website was altered to a pay-per-click ("PPC") parking page containing advertisement links, including links relating to games. The Respondent did not reply to the Complainant's correspondence.

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 disputed domain name is confusingly similar to the Trade Mark, that the Respondent has no rights or legitimate interests with respect to the disputed domain name, and that the disputed domain name was registered and is being used in bad faith.

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 trade mark and the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

Based on the available record, the Panel finds the Complainant has shown rights in respect of a trade mark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The Panel finds the entirety of the Trade Mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the Trade Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

While the addition of the term "game" after the Trade Mark may bear on assessment of the second and third elements, the Panel finds the addition of that term as well as the hyphen does not prevent a finding of confusing similarity between the disputed domain name and the Trade Mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

Based on the available record, 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.

While 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 often impossible 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. 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 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 nature of the disputed domain name incorporating the Trade Mark and the term descriptive of the Complainant's product protected by the Trade Mark coupled with the prior use of the disputed domain name, affirms the Respondent's intention of taking unfair advantage of the likelihood of confusion between the disputed domain name and the Complainant as to the origin or affiliation of the website at the dispute domain name.

Based on the available record, 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 must have been aware of the Trade Mark when registering the disputed domain name, given that the disputed domain name was registered only two days after the Complainant announced the launch of the Game and less than two months after the Complainant applied to register the Trade Mark. It is therefore very likely that the Respondent was aware of the Complainant when he registered the disputed domain name.

As noted in section 3.2.2 of the [WIPO Overview 3.0](#):

“Noting the near instantaneous and global reach of the Internet and search engines, and particularly in circumstances where the complainant’s mark is widely known (including in its sector) or highly specific and a respondent cannot credibly claim to have been unaware of the mark (particularly in the case of domainers), panels have been prepared to infer that the respondent knew, or have found that the respondent should have known, that its registration would be identical or confusingly similar to a complainant’s mark. Further factors including the nature of the domain name, the chosen top-level domain, any use of the domain name, or any respondent pattern, may obviate a respondent’s claim not to have been aware of the complainant’s mark.”

The fact that the disputed domain name was registered before the Trade Mark achieved registration does not prevent a finding of bad faith in the circumstances of the present proceedings. This case falls within the exception identified in section 3.8.2 of the [WIPO Overview 3.0](#), where it is clear from the timing that the Respondent’s intent in registering the disputed domain name was to unfairly capitalize on the Complainant’s nascent trade mark rights following the media announcement of the Game.

The absence of rights or legitimate interests, coupled with the Respondent’s choice of the disputed domain name without any explanation, is also a significant factor to consider (see [WIPO Overview 3.0](#), section 3.2.1). Having taken those into account, and the Panel finds that registration is in bad faith. The addition of the term “game” after the Trade Mark further underscores that the Respondent had actual knowledge of and was deliberately targeting the Complainant, as it directly describes the product offered under the Trade Mark.

The Panel further finds that the disputed domain name is also being used in bad faith. The Website explicitly promoted itself as “CrossClimb LinkedIn Game – Play Unlimited. A word ladder puzzle inspired by LinkedIn’s daily game – with unlimited plays!” thereby trading directly on the Complainant’s Trade Mark and goodwill. Such use not only misleads Internet users into believing that the site is affiliated with or authorised by the Complainant, but also seeks to divert traffic for the Respondent’s own commercial gain.

The fact that the Website is now configured as a PPC site likely set up for the commercial benefit of the Respondent further demonstrates opportunistic bad faith. The Respondent employs the reputation of the Trade Mark to mislead users into visiting the disputed domain name instead of the Complainant’s. From the above, the Panel concludes that the Respondent intentionally attempted to attract Internet users for commercial gain, by misleading them into the Respondent’s Website under a mistaken belief that the Website is that of or authorised or endorsed by the Complainant.

In light of the circumstances, the Panel finds that the disputed domain name has been registered and is being used in bad faith under paragraph 4(b)(iv) of the Policy.

Based on the available record, the Panel finds 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 <crossclimb-game.com> be transferred to the Complainant.

/Karen Fong/

Karen Fong

Sole Panelist

Date: September 22, 2025