

## **ADMINISTRATIVE PANEL DECISION**

Cozen O'Connor v. Thomas Zhao  
Case No. D2025-3145

### **1. The Parties**

Complainant is Cozen O'Connor, United States of America ("United States" or "U.S."), internally represented.

Respondent is Thomas Zhao, United States.

### **2. The Domain Name and Registrar**

The disputed domain name <cozen.lawyer> 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 6, 2025. On August 7, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On August 7, 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 (Unknown Registrant) and contact information in the Complaint. The Center sent an email communication to Complainant on August 8, 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 11, 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 12, 2025. In accordance with the Rules, paragraph 5, the due date for Response was September 1, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on September 5, 2025.

The Center appointed Michael A. Albert as the sole panelist in this matter on September 10, 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**

Established in 1970, Complainant has more than 925 attorneys practicing internationally in 32 cities across North America and the United Kingdom. Complainant is a well-known full-service law firm that practices in the areas of litigation, business law, and government relations, and its attorneys have experience operating in all sectors of the economy. Complainant's client list includes global Fortune 500 companies, middle-market firms, startups, and high-profile individuals. Since 1997, Complainant has used <cozen.com> as its domain name to advertise and market its legal services.

Complainant has also protected its intellectual property rights by filing for and obtaining trademark registrations with the United States Patent and Trademark Office. These registrations include, but are not limited to the following (the "COZEN Marks"):

- U.S. Reg. No. 2872611 for COZEN.COM, filed on August 7, 2002 and registered on August 10, 2004, for "Legal services" in International Class 42. This mark has been used by Complainant in connection with the aforementioned services since at least as early as August 18, 1997; and
- U.S. Reg. No. 2731956 for COZEN O'CONNOR, filed on September 18, 2002 and registered on July 1, 2003 for "Legal services" in International Class 42. This mark has been used by Complainant in connection with the aforementioned services since at least as early as April 27, 2001.

The disputed domain name was registered on July 21, 2025, and displays a copycat version of the Complainant's website at "www.cozen.com".

#### **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 the disputed domain name is confusingly similar to Complainant's marks. It is virtually identical to Complainant's federally-registered COZEN.COM Mark apart from the additional term "lawyer." The mere addition of the descriptive term "lawyer" to Complainant's COZEN Mark in the disputed domain name does not decrease but actually increases the likelihood of confusion, as consumers may believe the disputed domain name is affiliated with Complainant's legal business which uses that mark in connection with advertising and marketing its legal services.

Respondent has no rights or legitimate interests in the disputed domain name. Respondent is not affiliated with Complainant, and there is no evidence to suggest that Respondent has registered the disputed domain name to advance legitimate interests or for the bona fide offering of legitimate goods or services.

Respondent's registration and its use of the Disputed Domain to display a clone of Complainant's website, are in bad faith.

##### **B. Respondent**

Respondent did not reply to 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 Complainant's trademark and the disputed domain name. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

Here, 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, by virtue of its multiple U.S. federal trademark registrations.

The dominant element of the COZEN.COM mark is reproduced within the disputed domain name. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7.

Although a Top-Level Domain ("TLD") is typically disregarded in determining identity or confusing similarity, its ordinary meaning – here, ".lawyer" – may be relevant to panel assessment of the second and third elements. [WIPO Overview 3.0](#), section 1.11.2.

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 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. The COZEN Marks are registered and closely associated with Complainant, whereas there is no indication that Respondent has ever been known by the disputed domain name or made any legitimate or good-faith use of it.

Respondent has not rebutted Complainant's prima facie showing and has not come forward with any evidence purporting to demonstrate rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

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, although 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.

Respondent was undoubtedly well aware of Complainant and had Complainant's mark in mind when registering the disputed domain name. Indeed, the confusing similarity between the disputed domain name and a well-known mark coupled with its use to host a copycat version of Complainant's official site makes it highly plausible that Respondent's registration and use of the disputed domain name (together with the addition of a TLD descriptive of Complainant's business) was an intentional effort to capitalize on or otherwise take advantage of the likelihood of confusion with Complainant's trademark rights.

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 <cozen.lawyer> be transferred to Complainant.

*/Michael A. Albert/*

**Michael A. Albert**

Sole Panelist

Date: September 24, 2025