ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
LinkedIn Corporation v. Connor Bray
Case No. D2025-3815

1. The Parties

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

The Respondent is Connor Bray, United States.

2. The Domain Name and Registrar

The disputed domain name <linkedin-games.win> is registered with CloudFlare, Inc. (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 19, 2025. On September 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 24, 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 (DATA REDACTED) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 26, 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 September 30, 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 September 30, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 20, 2025. The Response was filed with the Center on October 20, 2025. On October 23, 2025, the Complainant submitted a supplemental filing.

The Center appointed Evan D. Brown as the sole panelist in this matter on November 6, 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 a social media company and describes itself as "the world's largest professional network on the Internet." It owns the mark LINKEDIN, for which it enjoys the benefits of registration in many jurisdictions around the world (for example, United States Reg. No. 3,074,241, registered on March 28, 2006). The Complainant offers a number of games online as part of its services, including a logic game called "Queens," which it announced on April 30, 2024. The Queens game has a certain visual appearance that comes about by means of pastel-colored squares containing, as the game play dictates, either an "x" or a crown symbol.

According to the RDAP information, the disputed domain name was registered on July 28, 2025. The Respondent has used the disputed domain name in connection with a web page that prominently describes itself in its header as "LinkedIn Queens / A daily solution to the LinkedIn queens puzzle". The Respondent uses the web page to publish copies or derivative works of the Complainant's Queens games, including a visual representation that mimics the game's layout of pastel squares and the symbols within them.

5. Parties' Contentions

A. Complainant

The Complainant contends that the disputed domain name is identical or confusingly similar to the Complainant's trademark; that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and that the disputed domain name was registered and is being used in bad faith.

B. Respondent

Under the first element of the Policy, the Respondent concedes that the Complainant has rights in its LINKEDIN mark and makes no argument against the assertion that the disputed domain name is identical or confusingly similar to that mark. As for the second element of the Policy, the Respondent argues that it has rights or legitimate interests because its site is a noncommercial hobby project that only displays puzzle solutions, offers no services similar to the Complainant, and uses the name of the puzzle in a limited, descriptive way that does not suggest any affiliation. And for the third element, the Respondent asserts that there is no evidence of bad-faith registration or use because the site is entirely noncommercial, offers no competing services, does not attempt to attract or mislead users, and reflects a personal, educational project with no intent to exploit the Complainant's mark or disrupt its business. Separately, the Respondent further contends that the Complaint itself warrants a finding of Reverse Domain Name Hijacking because it is based on mischaracterizations, unsupported allegations, and incomplete evidence, and appears to have been filed as an overreaching attempt to obtain a domain name to which the Complainant has no legitimate claim.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights, (ii) the Respondent has no rights or legitimate interests in respect of the disputed domain name, and (iii) the disputed domain name has been registered and is being used in bad faith. The Panel finds that all three of these elements have been met in this case.

A. Identical or Confusingly Similar

This first element functions primarily as a standing requirement. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("WIPO Overview 3.0"), section 1.7. 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. Id. This element requires the Panel to consider two issues: first, whether the Complainant has rights in a relevant mark; and second, whether the disputed domain name is identical or confusingly similar to that mark.

A registered trademark provides a clear indication that the rights in the mark shown on the trademark certificate belong to its respective owner. See *Advance Magazine Publishers Inc., Les Publications Conde Nast S.A. v. Voguechen*, WIPO Case No. D2014-0657. The Complainant has demonstrated its rights in the LINKEDIN mark by providing evidence of its trademark registrations. See WIPO Overview 3.0, section 1.2.1. The disputed domain name incorporates the LINKEDIN mark in its entirety with the addition of the word "games," which does not prevent a finding of confusing similarity between the disputed domain name and the Complainant's LINKEDIN mark. See WIPO Overview 3.0, section 1.8. The LINKEDIN mark remains recognizable for a showing of confusing similarity under the Policy.

It is standard practice when comparing a disputed domain name to a complainant's trademarks, to not take the extension into account. See WIPO Overview 3.0 at 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 that the Complainant has established this first element under the Policy.

B. Rights or Legitimate Interests

The Panel evaluates this element of the Policy by first assessing whether the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests in respect of the disputed domain name. If the Complainant makes that showing, the burden of production shifts to the Respondent to demonstrate rights or legitimate interests, with the burden of proof always remaining on the Complainant. See WIPO Overview 3.0, section 2.1.

Here, the Complainant asserts, among other things, that: (1) it has never assigned, granted, licensed, sold, transferred, or otherwise authorized the Respondent to register or use its LINKEDIN mark in any manner; (2) there is no evidence of any relationship between the Parties that would give rise to permission or authorization to use the mark; (3) the Respondent has used the disputed domain name to publish content that mimics the Complainant's Queens game, which the Complainant offers as part of its services under the LINKEDIN mark, and has therefore not used the disputed domain name in connection with any bona fide offering of goods or services; and (4) the Respondent has never been commonly known by the disputed domain name, as reflected in the WhoIs record.

The Panel finds that these assertions establish the Complainant's prima facie showing under this element of the Policy.

The Respondent contends that its website merely displays programmatically generated puzzle solutions and does not reproduce or host gameplay similar to the Complainant's. It characterizes the site as a personal, non-interactive, technical display, not a commercial or competitive service.

However, the Complainant emphasizes that this distinction is immaterial and under these circumstances, and the Panel agrees. The Respondent's site explicitly describes itself as offering "a daily solution to the LinkedIn queens puzzle," and displays a layout that visually mimics the Complainant's Queens game. The website content does nothing to meaningfully communicate that it is not provided or offered by the Complainant. Prior panels have found that where a respondent uses a domain name to publish content derivative of a complainant's service or product, this does not amount to a bona fide offering. See *trivago*

GmbH v. Nomads/Perminder (David) Marin-Pache, WIPO Case No. D2014-0542 (no legitimate interest where the respondent "provid[ed] identical services as the Complainant"); *Multi Media, LLC v. Domain Admin, Whois Privacy Corp.*, WIPO Case No. D2016-1039 (finding no rights where "the website to which the disputed domain name resolves offers the same services that the Complainant offers"). While the Respondent's website may not offer interactive gameplay and thus is not *exactly* identical in form to the Complainant's Queens game, the publication of daily solutions to that game constitutes a sufficiently similar use to fall within the scope of services that the Complainant offers and seeks to protect under its LINKEDIN mark.

The Respondent also characterizes the website as a hobby project intended to showcase programming skills, arguing that there is no monetization, advertising, or user tracking, and that its use of the LINKEDIN mark is nominative and descriptive.

The Complainant addresses this claim by noting that the Policy does not limit commercial gain to financial benefit. The Respondent asserts that the website serves to demonstrate the Respondent's technical proficiency, which can confer reputational gain. Numerous panels have rejected such reputational gain as a basis for legitimate interest. See *GitHub, Inc. v. Ahmed Kamel*, WIPO Case No. D2022-3512 (finding bad faith even without financial gain, noting that reputational gain also falls within the scope of the Policy); *Casino Guichard Perrachon v. Contact Privacy Inc. Customer 0153135447 / Privacy Inc. Customer 0153136304 / Sophie Vermeille*, WIPO Case No. D2018-2633 (reputational gain "cannot be considered as fair use and would not support a claim to rights or legitimate interests").

Furthermore, the Complainant argues that the Respondent did not need to use the LINKEDIN mark in the disputed domain name in order to describe or display its technical work. The absence of necessity undercuts the Respondent's claim to nominative fair use.

The Respondent next argues that the doctrine of initial interest confusion – a theory the Complainant advanced – is no longer widely followed, citing WIPO UDRP cases and U.S. law, to support the position that confusion requires a likelihood of mistaken affiliation or sponsorship. Even without considering the issue through the lens of the initial interest confusion doctrine which the Panel agrees is not a widely or even generally followed legal doctrine, the Panel can conclude that the Respondent's use of the LINKEDIN mark plus the term "games" in the disputed domain name, especially when coupled with the presentation of puzzle solutions drawn from the Complainant's game, creates a misleading impression of affiliation and therefore does not confer rights or legitimate interests under the Policy.

The Complainant invokes *Oki Data Americas, Inc. v. ASD, Inc.*, WIPO Case No. D2001-0903, to further demonstrate why the Respondent's arguments fall short. A key requirement of the *Oki Data* test is that the site accurately disclose the nature of its relationship with the trademark holder. Here, even beyond the misleading impression created by the disputed domain name itself, there is no such disclosure. The Respondent's website does not accurately communicate the relationship between the Complainant and the Respondent.

Under this second element, the Panel finds that the Respondent's arguments do not overcome the Complainant's prima facie showing. The Respondent uses the LINKEDIN mark plus the term "games" to host puzzle solutions that closely imitate the Complainant's own offering. The website includes no disclaimer, clarification, or other distinguishing feature that would alert users to its lack of affiliation. Taken together with the (reputational) benefit the Respondent gains by appropriating the Complainant's well-known brand, these circumstances fail to establish any rights or legitimate interests under the Policy

Accordingly, the Panel finds that the Complainant has established this second element under the Policy.

C. Registered and Used in Bad Faith

The Panel finds that the disputed domain name was registered and is being used in bad faith under paragraph 4(a)(iii) of the Policy.

On balance, the facts here offer no benign explanation for the Respondent's choices: the only plausible inference is that the Respondent registered and used the disputed domain name either to disrupt the Complainant's relationship with its users or to attract Internet users for its own purposes. Both constitute evidence of bad faith under the Policy. The Respondent's attempts to characterize the website as a harmless hobby project are not credible, given the overall circumstances, and do not effectively counter the indicia of bad faith.

The evidence also shows that the Respondent is publishing copies or derivative works of the Complainant's game, specifically, solutions to the Complainant's proprietary LinkedIn Queens logic puzzle, without authorization. Panels have held that unauthorized copying of a complainant's copyrighted or branded content demonstrates bad faith. See *King.com Limited v. WhoisGuard, Inc. / Nguyen Hung Manh*, WIPO Case No. D2014-1448 (use of graphical elements of complainant's games supported a finding of bad faith); *Wikia, Inc. v. PrivacyGuardian.org / Chris Goodwin*, WIPO Case No. D2015-2100 (unauthorized copying of marks and copyrighted elements constitutes manifest bad faith). The Respondent's similar conduct here provides additional, independent confirmation of bad faith.

The Respondent's assertions that the website is merely a hobby project, that the use is noncommercial, or that no confusion is intended, do not outweigh the evidence demonstrating that the Respondent deliberately targeted the Complainant's well-known mark. The totality of circumstances here supports a finding of bad-faith registration and use.

For these reasons, the Panel finds that the disputed domain name was registered and is being used in bad faith within the meaning 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-games.win> be transferred to the Complainant.

/Evan D. Brown /
Evan D. Brown
Sole Panelist
Date: November 20, 2025