

## **ADMINISTRATIVE PANEL DECISION**

Latham & Watkins LLP v. Zamco Zi  
Case No. D2025-4401

### **1. The Parties**

The Complainant is Latham & Watkins LLP, United States of America ("United States"), represented by Latham & Watkins LLP, United States.

The Respondent is Zamco Zi, United Kingdom.

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

The disputed domain name <lwatkinsllp.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 October 24, 2025. On October 27, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 27, 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 (Domain Administrator, PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 28, 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 amended Complaints on October 28, 2025 and October 31, 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 the Respondent of the Complaint, and the proceedings commenced on November 7, 2025. In accordance with the Rules, paragraph 5, the due date for Response was November 27, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on November 28, 2025.

The Center appointed Vincent Denoyelle as the sole panelist in this matter on December 4, 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 United States law firm with international presence in fourteen countries. The Complainant is set up as a limited liability partnership ("llp"). It has operated under the name Latham & Watkins since it was founded in 1934.

The Complainant owns several LATHAM & WATKINS trade marks including the following:

- United States trade mark LATHAM & WATKINS No. 2,413,795, registered on December 19, 2000 and;
- United States trade mark LATHAM & WATKINS No. 4,968,228, registered on May 31, 2016.

The Complainant also owns domain names consisting of or incorporating its LATHAM & WATKINS trade mark, or variations of it, including <latham.com>, <lathamawatkins.com>, and <lathamwatkins.com>.

The Respondent registered the disputed domain name on January 8, 2025. The disputed domain name triggers a warning message stating "This website has been reported for potential phishing." and the Complainant has produced evidence that it had been previously used to impersonate the Complainant's accounts receivable team in an attempt to fraudulently extract money from a third party.

#### **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 Complainant's globally recognized and valuable LATHAM & WATKINS trade mark.

The Complainant asserts that the Respondent cannot claim any rights or legitimate interest in the disputed domain name because it never received the Complainant's authorization, license, consent, or permission to use the LATHAM & WATKINS trade mark or register the disputed domain name, and it has not entered into any relationship with the Complainant. The Complainant also contends that the LATHAM & WATKINS trade mark has no other meaning but to identify the Complainant and its services. The Complainant adds that the Respondent's attempted fraud confers no rights or legitimate interests in the disputed domain name.

The Complainant argues that it is not possible to conceive of a plausible situation in which the Respondent would have been unaware of the Complainant's trade mark at the time of registration of the disputed domain name. The Complainant considers that the term "lwatkinsllp" has no apparent existence or meaning except as a misspelling and reference to the Complainant's LATHAM & WATKINS trade mark. The Complainant contends that the disputed domain name is used in bad faith given that it has been used to impersonate the Complainant and facilitate phishing activities in an effort to defraud unsuspecting third parties.

##### **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. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ("[WIPO Overview 3.0](#)"), section 1.7.

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 that the LATHAM & WATKINS trade mark is recognizable within the disputed domain name as it contains the initial of the first part of the Complainant's trade mark and the entirety of the second part of the Complainant's trade mark. Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.7. This is further supported by the fact that when typing the term "lwatkinsllp" in a Google search all results obtained relate to the Complainant.

Although the addition of other terms here, "llp", may bear on assessment of the second and third elements, the Panel finds the addition of such term does not prevent a finding of confusing similarity between the disputed domain name and the mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.8.

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.

Panels have held that the use of a domain name for illegal activity here, phishing and fraudulent impersonation can never confer rights or legitimate interests on a respondent. [WIPO Overview 3.0](#), section 2.13.1.

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 finds that the Respondent, at the time of registration of the disputed domain name, must have been aware of the Complainant's trade mark LATHAM & WATKINS given (i) the longstanding use and distinctiveness of the LATHAM & WATKINS trade mark, (ii) the fact that the disputed domain name was registered relatively recently and many years after the registration of the trade mark LATHAM & WATKINS and (iii) the choice of term added to the LATHAM & WATKINS trade mark, "llp", which clearly refers to the Complainant's form of incorporation which is very typical for law firms.

Turning to use in bad faith, the Panel notes that the website associated with the disputed domain name triggers a phishing warning. In addition, the Complainant has produced evidence that the disputed domain name had been previously used to impersonate Complainant's accounts receivable team in an attempt to fraudulently extract money from a third party.

Panels have held that the use of a domain name for illegal activity here, phishing and fraudulent impersonation, constitutes bad faith. [WIPO Overview 3.0](#), section 3.4. Having reviewed the record, the Panel finds the Respondent's registration and use of the disputed domain name constitute 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 <lwatkinsllp.com> be transferred to the Complainant.

*/Vincent Denoyelle/*

**Vincent Denoyelle**

Sole Panelist

Date: December 18, 2025