

ADMINISTRATIVE PANEL DECISION

Gibson, Dunn & Crutcher LLP v. Name Redacted
Case No. D2025-4798

1. The Parties

Complainant is Gibson, Dunn & Crutcher LLP, United States of America (“United States” and “U.S.”), internally represented.

Respondent is Name Redacted.¹

2. The Domain Name and Registrar

The disputed domain name <gibsonndun.com> (the “Domain Name”) is registered with Tucows Domains Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 19, 2025. On November 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Domain Name. On November 21, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Domain Name which differed from the named Respondent (Redacted for Privacy) and contact information in the Complaint. The Center sent an email communication to Complainant on November 24, 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 November 28, 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”).

¹ Respondent appears to have used the name of an employee of Complainant, albeit with the first and last names reversed, when registering the Domain Name. In light of the potential identity theft, the Panel has redacted Respondent’s name from this Decision. However, the Panel has attached as Annex 1 to this Decision an instruction to the Registrar regarding transfer of the Domain Name, which includes the name of the Respondent. The Panel has authorized the Center to transmit Annex 1 to the Registrar as part of the order in this proceeding and has indicated Annex 1 to this Decision shall not be published due to the exceptional circumstances of this case. See *Banco Bradesco S.A. v. FAST-12785241 Attn. Bradescourgente.net / Name Redacted*, WIPO Case No. [D2009-1788](#).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified Respondent of the Complaint, and the proceedings commenced on December 3, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 23, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on December 26, 2025.

The Center appointed Kimberley Chen Nobles, Phillip V. Marano and Lynda M. Braun as panelists in this matter on January 16, 2026. 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, U.S., with over 2,000 attorneys across 22 offices in the United States, Europe, Asia, and the Middle East. Originally founded in 1890, the firm has been known as Gibson Dunn since at least 1911.

Complainant owns U.S. registered trademark number 2,614,712 for the GIBSON DUNN word mark, registered on September 3, 2002, with a first use date of 1911. Complainant also owns numerous registered domain names with the GIBSON DUNN mark, including <gibsondunn.com>, registered in 1997.

The Domain Name was registered on October 1, 2025. At the time of filing the Complaint, the Domain Name resolved to an inactive site. However, an email address associated with the Domain Name was configured and used to facilitate the sending of emails to Complainant's client, and passed off as originating from Complainant's employees, in an attempt to fraudulently divert an invoice payment from Complainant's client to an account controlled by Respondent.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the Domain Name.

Notably, Complainant contends that (i) the Domain Name is confusingly similar to Complainant's trademark; (ii) Respondent has no rights or legitimate interests in the Domain Name; and (iii) Respondent registered and is using the Domain Name in bad faith.

In particular, Complainant contends that it has trademark registrations and rights for GIBSON DUNN and that Respondent registered and is using the Domain Name, which is a typosquatted variant where a letter "N" from "DUNN" is transposed to "GIBSON", with the intention to confuse Internet users looking for bona fide and well-known GIBSON DUNN services.

Complainant notes that it has no affiliation with Respondent, nor authorized Respondent to register or use a domain name which includes Complainant's trademark, and that Respondent has no rights or legitimate interests in the registration and use of the Domain Name. Rather, Complainant contends that Respondent has acted in bad faith in acquiring and setting up the Domain Name, when Respondent clearly knew of Complainant's rights. Specifically, Complainant argues that Respondent used a (reverse first and last name version of) Complainant's employee's name to register the Domain Name in furtherance of an illegal scheme to impersonate employees of Complainant and attempt to defraud payments from a client of Complainant.

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 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 Domain Name; and
- (iii) the Domain Name was registered and is being used in bad faith.

Section 4.3 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”) states that failure to respond to the complainant’s contentions would not by itself mean that the complainant is deemed to have prevailed; a respondent’s default is not necessarily an admission that the complainant’s claims are true.

Thus, although in this case Respondent has failed to respond to the Complaint, the burden remains with Complainant to establish the three elements of paragraph 4(a) of the Policy by a preponderance of the evidence.

A. Identical or Confusingly Similar

Complainant has provided evidence of its rights in the GIBSON DUNN trademark, as noted above. The Domain Name was registered over 100 years after the first use date of Complainant’s GIBSON DUNN trademark and certainly decades after registration of Complainant’s U.S. federally registered GIBSON DUNN trademark. Complainant has therefore proven that it has the requisite rights in the GIBSON DUNN trademark.

With Complainant’s rights in the GIBSON DUNN trademark established, the remaining question under the first element of the Policy is whether the Domain Name, typically disregarding the Top-Level Domain (“TLD”) in which it was registered (in this case, “.com”), is identical or confusingly similar to Complainant’s trademark. See, e.g., *B & H Foto & Electronics Corp. v. Domains by Proxy, Inc. / Joseph Gross*, WIPO Case No. [D2010-0842](#).

Here, the Domain Name is confusingly similar to Complainant’s GIBSON DUNN trademark. The GIBSON DUNN trademark is recognizable in the Domain Name.

The addition of the letter “n” after “gibson” and absence of the letter “n” in “dunn”, which is essentially a transposition of the letter “n” from “dunn” to “dun” and “gibson” to “gibsonn” in the Domain Name does not prevent a finding of confusing similarity between the Domain Name and the GIBSON DUNN trademark. See section 1.9 of the [WIPO Overview 3.0](#).

Thus, the Panel finds that Complainant has satisfied the first element of the Policy.

B. Rights or Legitimate Interests

Under paragraph 4(a)(ii) of the Policy, a complainant must make a *prima facie* showing that a respondent possesses no rights or legitimate interests in a disputed domain name. See, e.g., *Malayan Banking Berhad v. Beauty, Success & Truth International*, WIPO Case No. [D2008-1393](#). Once a complainant makes such a *prima facie* showing, the burden of production shifts to the respondent, though the burden of proof always remains on the complainant. If the respondent fails to come forward with relevant evidence showing rights or legitimate interests, the complainant will have sustained its burden under the second element of the UDRP.

From the record in this case, it is evident that Respondent was, and is, aware of Complainant and its GIBSON DUNN trademark and does not have any rights or legitimate interests in the Domain Name. Complainant has confirmed that Respondent is not affiliated with Complainant, or otherwise authorized or licensed to use the GIBSON DUNN trademark or to seek registration of any domain name incorporating

these trademark. Respondent is also not known to be associated with the GIBSON DUNN trademark and there is no evidence showing that Respondent has been commonly known by the Domain Name.

The registration of the Domain Name is an attempt in “typosquatting”, whereby the Domain Name <gibsonndun.com> is clearly intended to confuse Internet users into believing the Domain Name belongs to Complainant. See e.g., *Debevoise & Plimpton LLP v. Keyword Marketing, Inc. / Web Advertising, Corp.*, WIPO Case No. [D2007-1679](#) (explaining “typosquatting” is “a form of cybersquatting in which a respondent registers and uses a domain name in order to take advantage of typographical errors made by Internet users seeking the complainant’s commercial website”).

In addition, Respondent has not used the Domain Name in connection with a bona fide offering of goods or services or a legitimate noncommercial or fair use. Rather, the record shows that Respondent had used the Domain Name to engage in illegal activity, namely, the impersonation of two of Complainant’s employees in an attempt to fraudulently divert an invoice payment from Complainant’s client to an account controlled by Respondent. The emails each included the signature of Complainant’s employee and included a signature block with the names “Gibson Dunn” and “Gibson, Dunn & Crutcher LLP”, the official address for Gibson Dunn’s New York office, Complainant’s employee’s actual email address, “[...]@gibsondunn.com”, phone and fax number, and a link to Complainant’s domain name, <gibsondunn.com>.

UDRP panels have consistently held that use of a domain name for illegal activity — such as email phishing, impersonation, or passing off — can never confer rights or legitimate interests on a respondent.

[WIPO Overview 3.0](#), section 2.13.1.

Furthermore, Respondent used a proxy service or selected a registrar with default proxy services to mask its identity, and Respondent has used false underlying contact information to register the Domain Name. The Panel finds that such use of a false name and contact information of Complainant’s employee’s name, even with the first and last names reversed when the true name is recognizable, constitutes identity theft and does not confer rights or legitimate interests on Respondent.²

Accordingly, Complainant has provided evidence supporting its *prima facie* showing that Respondent lacks any rights or legitimate interests in the Domain Name. Respondent has failed to produce countervailing evidence of any rights or legitimate interests in the Domain Name. Thus, the Panel concludes that Respondent does not have any rights or legitimate interests in the Domain Name and Complainant has met its burden under paragraph 4(a)(ii) of the Policy.

C. Registered and Used in Bad Faith

The Panel finds that Respondent’s actions indicate that Respondent registered and is using the Domain Name in bad faith.

Paragraph 4(b) of the Policy provides a non-exhaustive list of circumstances indicating bad faith registration and use on the part of a respondent, namely:

“(i) circumstances indicating that you have registered or you have acquired the domain name primarily for the purpose of selling, renting, or otherwise transferring the domain name registration to the complainant who is the owner of the trademark or service mark or to a competitor of that complainant, for valuable consideration in excess of your documented out-of-pocket costs directly related to the domain name; or

² Complainant verified that its employee was not involved in registering the Domain Name and has no knowledge regarding the registration since there is no connection between the employee and the contact information that Respondent used to register the Domain Name. Thus, the Panel concludes that the employee was the subject of identity theft, since the name was recognizable as an employee of Complainant despite the reversal of the first and last names.

- (ii) you have registered the domain name in order to prevent the owner of the trademark or service mark from reflecting the mark in a corresponding domain name, provided that you have engaged in a pattern of such conduct; or
- (iii) you have registered the domain name primarily for the purpose of disrupting the business of a competitor; or
- (iv) by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your website or other online location, by creating a likelihood of confusion with the complainant's mark as to the source, sponsorship, affiliation, or endorsement of your website or location or of a product or service on your website or location."

The Panel finds that Complainant has provided ample evidence to show that registration and use of the GIBSON DUNN trademark long predate the registration of the Domain Name. Complainant is also well established and known; indeed, the record shows that Complainant's GIBSON DUNN trademark and related services are widely known and recognized for purposes of the Policy. Therefore, and also noting the use analysis below, Respondent was clearly aware of the GIBSON DUNN trademark when it registered the Domain Name.

The Panel therefore finds that Respondent's awareness of Complainant's trademark rights at the time of registration suggests bad faith. See *Red Bull GmbH v. Credit du Léman SA, Jean-Denis Deletraz*, WIPO Case No. [D2011-2209](#); *Nintendo of America Inc v. Marco Beijen, Beijen Consulting, Pokemon Fan Clubs Org., and Pokemon Fans Unite*, WIPO Case No. [D2001-1070](#); and *BellSouth Intellectual Property Corporation v. Serena, Axel*, WIPO Case No. [D2006-0007](#).

Moreover, the Domain Name's inclusion of Complainant's trademark in its entirety, with the transposition of the letter "n" as discussed above, is clearly an attempt in "typosquatting", whereby the Domain Name <gibsonndun.com> is clearly intended to confuse Internet users into believing the Domain Name belongs to Complainant. Such adoption of Complainant's trademark at the time of registration of the Domain Name is a common tactic for phishing schemes, where individuals seek to pass themselves off as prominent law firms in the hopes of seeking confidential information and, ultimately, transfers of funds from current or potential clients of those law firms. See, e.g., *Gibson, Dunn & Crutcher, LLP v. Jason Leonardo*, WIPO Case No. [D2025-2989](#) (transferring the domain name gibsondunn.com to Complainant Gibson Dunn); *Latham & Watkins LLP v. Name Redacted*, WIPO Case No. [D2021-2877](#) (transferring the domain name lathamwatkins-llp.com to the law firm Latham & Watkins LLP); *Ropes & Gray LLP v. matthew rolland, ropes gray*, WIPO Case No. [D2023-0288](#) (transferring the domain name ropesgray-us.com to the law firm Ropes & Gray LLP).

As noted above, the record shows that Respondent had used the Domain Name to engage in illegal activity, namely the impersonation of two of Complainant's employees in an attempt to fraudulently divert an invoice payment from Complainant's client to an account controlled by Respondent.

UDRP panels have consistently held that a respondent's use of a domain name to trade off goodwill in a complainant's well-known trademark and impersonate complainant, as here, constitutes bad faith. See *Philip Morris Products S.A. v. homn mohmoodi*, WIPO Case No. [D2022-4158](#). Moreover, such use of the Domain Name may potentially result in tarnishing Complainant's reputation and goodwill.

Finally, the Panel also notes the failure of Respondent to submit a response, Respondent's use of a proxy service or selection of a registrar with default proxy services to mask its identity, and Respondent's use of false underlying contact information (with a non-existent street address, and the first and last names of Respondent's impersonation target merely reversed) to register the Domain Name. The Panel thus considers such factors as strong further evidence of Respondent's registration and use constitutes bad faith.

In the present circumstances, considering the reputation of the GIBSON DUNN trademark, and the fraudulent use of the Domain Name, the Panel finds that Respondent registered and is using the Domain Name in bad faith.

Therefore, the Panel finds that Complainant succeeds under the third element of paragraph 4(a) 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 Domain Name <gibsonndun.com> be transferred to Complainant.

/Kimberley Chen Nobles/
Kimberley Chen Nobles
Presiding Panelist

/Phillip V. Marano/
Phillip V. Marano
Panelist

/Lynda M. Braun/
Lynda M. Braun
Panelist
Date: January 27, 2026