

## **ADMINISTRATIVE PANEL DECISION**

Latham & Watkins LLP v. Farshid Arshid

Case No. D2025-4841

### **1. The Parties**

Complainant is Latham & Watkins LLP, United States of America (the “United States” or “U.S.”), represented internally.

Respondent is Farshid Arshid, United States.

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

The disputed domain name <lw-group.net> (the “Domain Name”) is registered with NameSilo, LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on November 21, 2025. On November 21, 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 (Privacy User #5fc0772a, See PrivacyGuardian.org) and contact information in the Complaint. The Center sent an email 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 26, 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 November 26, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 16, 2025. Respondent did not submit any response. Accordingly, the Center notified Respondent’s default on December 17, 2025.

The Center appointed Robert A. Badgley as the sole panelist in this matter on December 23, 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**

Complainant is one of the largest and most prestigious law firms in the world, and is certainly so in the United States. According to the Complaint:

"Complainant is one of the world's top law firms with over 3,500 attorneys in thirty offices located in fourteen countries. Complainant is widely known for offering superior legal services to some of the world's largest corporations in complex "bet the company" matters, and it is routinely ranked among the best law firms in the world in leading legal publications such as The American Lawyer, MergerMarket, and Chambers and Partners."

"Since its founding in Los Angeles, California, in 1934, Complainant has offered professional legal services under the LATHAM & WATKINS® trademark and associated logos and terms. [...] Through extensive use and advertising of the LATHAM & WATKINS trademark, the mark has developed a strong reputation among clients and the legal industry as being associated with the top-notch legal services that Complainant provides. Complainant also offers its superior legal services under the LW trademark. Indeed, the LW mark has come to signify Latham's services to clients and the legal industry at large."

With respect to the alleged LW trademark, Complainant offers two types of evidence. First, there is a Facebook page which boasts 11,000 followers. The Facebook page makes frequent use of a red thumbnail with the white letters LW. Otherwise, the page does not use the initials LW, and when describing the firm or its activities, lawyers, and achievements, it refers to LATHAM & WATKINS or to "LATHAM".

Second, there is an apparent screenshot of Complainant's website accessible via the domain name <lw.com>. This website features the same red "LW" thumbnail, but, again, makes no other reference to LW. As with the Facebook page, Complainant routinely refers to itself and LATHAM & WATKINS or LATHAM, but not as LW.

Complainant holds various trademark registrations for the mark LATHAM & WATKINS in several jurisdictions, including U.S. Registration No. 2,413,795, registered on December 19, 2000, in connection with, among other things, "legal services," with a 1934 date of first use in commerce.

The Domain Name was registered on October 16, 2024. As of November 26, 2025, the Domain Name resolved to a parking page with a handful apparent hyperlinks, most of which pertained to "PCs" and none of which pertained to law firms or legal services.

According to the Registrar, Respondent listed his physical address as the same address as Complainant's New York address.

#### **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.

## **B. Respondent**

Respondent did not reply to Complainant's contentions.

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy lists the three elements which Complainant must satisfy with respect to the Domain Name:

- (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 has been registered and is being used in bad faith.

### **A. Identical or Confusingly Similar**

The Panel finds that Complainant has rights in the mark LATHAM & WATKINS through registration and use demonstrated in the record. The Panel also concludes, for purposes of this proceeding, that Complainant has unregistered rights in the mark LW. As noted above, Complainant which has existed as a firm for nearly 100 years owns the domain name <lw.com> and uses that domain name to operate its commercial website. In addition, Complainant uses a red LW thumbnail on its Facebook page and at its website (though, as noted, the record lacks other instances where Complainant refers to itself as LW).

The Panel also concludes that the Domain Name is confusingly similar to the LW mark. The Domain Name entirely incorporates the mark LW and adds a hyphen and the word "group". In the Panel's view, Complainant's LW mark remains recognizable within the Domain Name, notwithstanding the hyphen and additional text.

Complainant has established paragraph 4(a)(i) of the Policy.

### **B. Rights or Legitimate Interests**

Pursuant to paragraph 4(c) of the Policy, Respondent may establish its rights or legitimate interests in the Domain Name, among other circumstances, by showing any of the following elements:

- (i) before any notice to you [Respondent] of the dispute, your use of, or demonstrable preparations to use, the Domain Name or a name corresponding to the Domain Name in connection with a bona fide offering of goods or services; or
- (ii) you [Respondent] (as an individual, business, or other organization) have been commonly known by the Domain Name, even if you have acquired no trademark or service mark rights; or
- (iii) you [Respondent] are making a legitimate noncommercial or fair use of the Domain Name, without intent for commercial gain to misleadingly divert consumers or to tarnish the trademark or service mark at issue.

The Panel concludes that Respondent lacks rights or legitimate interests in respect of the Domain name. Respondent has not come forward in this proceeding to advance any bona fide basis for registering the Domain Name. Although it is conceivable that the pair of letters "lw" may legitimately make reference to something or someone other than Complainant, Respondent has not invoked any such example. As will be discussed below, the most probative piece of evidence in this case is the fact that Respondent listed his physical address as the address of Complainant's New York office. Absent any explanation why Respondent would list an obviously fake address in conjunction with a Domain Name containing "LW", the Panel finds that Respondent has no rights or legitimate interests vis-à-vis the Domain Name.

Complainant has established paragraph 4(c)(ii) of the Policy.

### **C. Registered and Used in Bad Faith**

Paragraph 4(b) of the Policy provides that the following circumstances, "in particular but without limitation," are evidence of the registration and use of the Domain Name in "bad faith":

- (i) circumstances indicating that Respondent has registered or has acquired the Domain Name primarily for the purpose of selling, renting, or otherwise transferring the Domain Name registration to Complainant who is the owner of the trademark or service mark or to a competitor of that Complainant, for valuable consideration in excess of its documented out of pocket costs directly related to the Domain Name; or
- (ii) that Respondent has 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 Respondent has engaged in a pattern of such conduct; or
- (iii) that Respondent has registered the Domain Name primarily for the purpose of disrupting the business of a competitor; or
- (iv) that by using the Domain Name, Respondent has intentionally attempted to attract, for commercial gain, Internet users to Respondent's website or other online location, by creating a likelihood of confusion with Complainant's mark as to the source, sponsorship, affiliation, or endorsement of Respondent's website or location or of a product or service on Respondent's website or location.

The Panel concludes, on the basis of the record presented here, that Complainant has carried its burden of proving that Respondent more likely than not had Complainant's LW mark in mind when registering the Domain Name. This conclusion was a close call that ultimately hinged on one fact, discussed below.

Complainant cites a series of prior UDRP decisions in which the panels transferred domain names to Complainant, but, with one exception, these cases were decided on the strength of the LATHAM & WATKINS mark and, as such, these cases were rather clear.

With specific reference to the mark LW, Complainant asserts:

"Further, Complainant has also established common-law rights to the LATHAM & WATKINS and LW marks through extensive use and promotion of the mark for many decades. The LATHAM & WATKINS and LW marks are well-known and famous throughout the United States and internationally and they impart substantial goodwill to Complainant. See also *Latham & Watkins LLP v. nathaniel webber*, WIPO Case No. [D2023-1964](#) (the "Webber case") ('[Latham] has used the LW Mark extensively across its significant digital media presence in association with its legal and other services. Third-party publications have also referenced [Latham] using the LW Mark, as evidenced by Complainant.'.)"

The Panel does not disagree with the panel's decision in the *Webber* case, but notes that it was decided on a different record and with a few relevant factual differences. First, as noted above by the panel in *Webber*, Complainant apparently provided record evidence in that case of third parties referring to Complainant as LW. No such showing was made in this case.

Second, and much more importantly, the respondent in *Webber* actually used the domain name <us-lw.com> in order to perpetrate a phishing scam by impersonating complainant. In such circumstances, it was obvious that the respondent was aware of Complainant and its use of the mark LW. In this case, by contrast, there is no evidence that Respondent has made any use of the Domain Name. There is no evidence in this record that Respondent has tried to impersonate Complainant. Also, as noted above, the parking page to which the Domain Name resolves contains a handful of apparent hyperlinks, none of which seems to bear any relationship with the legal profession. In the Panel's view, this is why the *Webber* case, while rightly decided, offers little guidance here.

As well-known and prestigious as the Complainant law firm is, the record here shows that Complainant routinely refers to itself as LATHAM or LATHAM & WATKINS, and seldom as LW.

As noted above, it is conceivable that the letters "LW" may refer legitimately to something other than Complainant. The Panel also finds that the addition of the word "group" to LW in the Domain Name does little to shed light on the case. As with LW itself, the word "group" in a domain name is capable of myriad applications and may serve well in various contexts.

Tellingly however, the Panel notes that Respondent employed a fake street address in the Whois information surrounding his registration of the Domain Name. That fake address is actually Complainant's real address for its New York office. For this reason, the Panel is left to conclude that Respondent registered the Domain Name with Complainant and its mark in mind. The Panel also notes that Respondent is not commonly known by the Domain Name, and it used what appears to be a fake name (that of a fashion designer) whose initials do not correspond to "lw".

The Panel also concludes that Respondent's passive holding of the Domain Name would not prevent a finding of bad faith use in the circumstances of this case, where there is clear targeting of a prestigious law firm and where Respondent offered no arguably legitimate reason for registering the Domain Name. In this case, the Panel finds that there is no conceivable good-faith basis for this Respondent to have registered this Domain Name.

Complainant has established Policy paragraph 4(a)(iii).

## **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 <lw-group.net> be transferred to Complainant.

*/Robert A. Badgley/*

**Robert A. Badgley**

Sole Panelist

Date: January 2, 2026