

ADMINISTRATIVE PANEL DECISION

Linklaters LLP v. mei dai zi yi yu tian

Case No. D2026-0418

1. The Parties

The Complainant is Linklaters LLP, United Kingdom, represented by CSC Digital Brand Services Group AB, Sweden.

The Respondent is mei dai zi yi yu tian, Japan.

2. The Domain Name and Registrar

The disputed domain name <linklatersfirm.com> is registered with Gname.com Pte. Ltd. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on February 2, 2026. On February 2, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On February 3, 2026, 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 (Redacted for privacy) and contact information in the Complaint. The Center sent an email communication to the Complainant on February 3, 2026, 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 amended Complaint on February 4, 2026.

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 February 10, 2026. In accordance with the Rules, paragraph 5, the due date for Response was March 2, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on March 4, 2026.

The Center appointed Simone Lahorgue Nunes as the sole panelist in this matter on March 12, 2026. 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 company registered in the United Kingdom under company number OC326345 since February 27, 2007. The Complainant “operates as a global law firm with headquarters in the UK and, together with its affiliates, provides legal services under the name ‘LINKLATERS’”.

The Complainant has provided evidence of being the right holder of the trademark LINKLATERS. For instance: International trademark registration No. 723079, registered on August 17, 1999; United States of America trademark registration No. 2633820, registered on October 15, 2002; Japan trademark registration No. 4504832, registered on September 7, 2001.

Furthermore, the Complainant asserts that it is the owner of the domain name <linklaters.com>.

The disputed domain name was registered by the Respondent on September 4, 2025. The website resolves to a blank page and lacks content.

The Respondent did not reply to the Complainant’s contentions.

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.

The Complainant argues that the Respondent created the Disputed Domain Name, by adding the generic, descriptive term “firm” to the LINKLATERS trademark, “thereby making the Disputed Domain Name confusingly similar to Complainant’s trademark”. In this regard, the Complainant argues that “‘firm’ – is a descriptive word for Complainant’s business and offered services, as Complainant operates a global law firm.”

The Complainant contends that in earlier cases, panels “have consistently held that a disputed domain name that consists merely of a complainant’s trademark and an additional term that closely relates to and describes that complainant’s business is confusingly similar to that complainant’s trademarks” (see e.g., *Inter IKEA Systems B.V. v. Franklin Lavall?e/ IkeaCuisine.net*, WIPO Case No. [D2015-2042](#)). In addition, the Complainant asserts that according to the “WIPO Jurisprudential Overview 3.0 at 1.8, ‘Where the relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise) would not prevent a finding of confusing similarity under the first element’”.

The Complainant argues that the registrations of the LINKLATERS trademark “is prima facie evidence of the validity of the term ‘LINKLATERS’ as a trademark, of Complainant’s ownership of this trademark, and of Complainant’s exclusive right to use the LINKLATERS trademark in commerce on or in connection with the goods and/or services specified in the registration certificates”.

According to the Complainant, the Respondent is not commonly known by the Disputed Domain Name, which evinces a lack of rights or legitimate interests.

Furthermore, the Complainant affirms that “has not licensed, authorized, or permitted Respondent to register domain names incorporating Complainant’s trademark”.

The Complainant argues that “the Center’s Notice of Registrant Information identified the Registrant as “Mei Dai Zi Yi Yu Tian”, which does not resemble the Disputed Domain Name in any manner.”

In addition, the Complainant asserts that “at the time of filing the complaint, Respondent was using a privacy WHOIS service, which past panels have also found to equate to a lack of legitimate interest” (see e.g., *Jackson National Life Insurance Company v. Private Whols wwwjacksonnationallife.com N4892*, WIPO Case No. [D2011-1855](#)).

The Complainant also argues that “Respondent is not making a bona fide offering of goods or services or legitimate, noncommercial fair use of the Disputed Domain Name. Respondent’s inclusion of the Complainant’s logo on the Disputed Domain Name’s former website is a direct effort to take advantage of the fame and goodwill that Complainant has built in its brand, and Respondent is not only using the confusingly similar Disputed Domain Name, but was also imitating Complainant by displaying the Complainant’s logo”.

In addition, the Complainant states that the Respondent registered the Disputed Domain Name on September 4, 2025, long after the registration of the LINKLATERS trademark with several intellectual property offices, as well as after the Complainant’s first use of the mark in 1838 and the registration of the <linklaters.com> domain name on September 23, 1996.

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 brands at the time the Disputed Domain Name was registered” (see e.g., *Telstra Corp. Ltd. v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#)).

The Complainant argues that, although the Disputed Domain Name currently resolves to an inactive site, prior panels have held that passive holding may still constitute bad faith use under 4(a)(iii) of the Policy. (see e.g., *Telstra Corp. Ltd. v. Nuclear Marshmallows*, WIPO Case No. [D2000-0003](#)).

In addition, the Complainant affirms that prior “to the website takedown performed by Complainant’s representatives, the Disputed Domain Name redirected internet users to a website that copied and attempted to duplicate Complainant’s official website by copying the design, color scheme, and Linklaters logo”. In this sense, the Complainant contends that it “is in itself evidence of the fact that Respondent does not have rights and legitimate interests in the Disputed Domain Names”. The Complainant shows cases in which the Panels have taken the view that such cases of impersonation where the relationship with Complainant is not properly disclosed cannot be deemed fair use, and in fact “constitute the kind of behavior prohibited by the Policy” (see e.g., *Volcom, LLC v. Omar Ray*, WIPO Case No. [D2017-0995](#) and *Marino v. Video Images Prod.*, WIPO Case No. [D2000-0598](#)).

Therefore, the Complainant affirms that “the Respondent, at the time of initial filing of the Complaint, had employed a privacy service to hide its identity, which past Panels have held serves as further evidence of bad faith registration and use” (see e.g., *Dr. Ing. H.C. F. Porsche AG v. Domains by Proxy, Inc.*, WIPO Case No. [D2003-0230](#)).

Finally, the Complainant requests the transfer of the Disputed Domain Name to the Complainant.

B. Respondent

The Respondent did not reply to the Complainant’s contentions.

6. Discussion and Findings

The analysis of the Complainant’s arguments and of the presented evidence leads to the conclusion that the Complaint should be upheld, based on the following grounds:

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 Select UDRP Questions ("[WIPO Overview 3.1](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

The entirety of the 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 3.1](#), section 1.7.

Although the addition of other term, here, "firm", which refers to the Complainant's business, 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 3.1](#), 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 that 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 3.1](#), 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 case 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.

The Respondent's prior use of the disputed domain name redirected users to a website that copied the Complainant's official website, including its design, color scheme, and logo.

Panels have consistently held that the use of domain names for illegitimate activity, including passing off, can never confer rights or legitimate interests on a respondent (see [WIPO Overview 3.1](#), 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 notes that the Respondent's bad faith registration and use of the disputed domain name for the following reasons:

First, the use of the LINKLATERS trademark in the disputed domain name with the addition of the term “firm”, suggests that the Respondent has registered the disputed domain name with the actual knowledge of the Complainant and its trademarks, and has done so in an attempt to create a likelihood of confusion with the Complainant.

Second, it is clear that the Respondent lacks rights or legitimate interests in the disputed domain name and this is reinforced by the fact that there is no credible explanation for the Respondent’s choice of the disputed domain name as the Respondent did not reply to the Complainant’s contentions. [WIPO Overview 3.1](#), section 3.2.1.

Third, the Respondent’s prior use of the disputed domain name to redirect users to a website that copied the Complainant’s official website - including its design, color scheme, and logo - demonstrates a clear intent to impersonate the Complainant and supports a finding of bad faith.

Fourth, the Respondent did not reply to the Complainant’s contentions.

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 <linklatersfirm.com> be transferred to the Complainant.

/Simone Lahorgue Nunes/

Simone Lahorgue Nunes

Sole Panelist

Date: March 24, 2026