

ADMINISTRATIVE PANEL DECISION

Gibson, Dunn & Crutcher LLP v. Name Redacted
Case No. D2026-0939

1. The Parties

The Complainant is Gibson, Dunn & Crutcher LLP, United States of America (the “United States”), internally represented.

The Respondent is Name Redacted¹, United Kingdom.

2. The Domain Name and Registrar

The disputed domain name <gibsondunn-law.com> is registered with Hostinger Operations, UAB (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 4, 2026. On March 5, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On the same day, 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 March 9, 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 March 14, 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”).

¹ The Respondent appears to have used the name of an employee of the Complainant when registering the disputed domain name. Accordingly, the Panel has redacted the 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 disputed 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Annex 1 to the Registrar as part of the order in this proceeding, and has indicated Annex 1 to this decision shall not be published due to the exceptional circumstances of this case.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 the Respondent of the Complaint, and the proceedings commenced on March 16, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 5, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent's default on April 11, 2026.

The Center appointed Alistair Payne, Phillip V. Marano, and Ian Lowe as panelists in this matter on April 22, 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

The Complainant is an international law firm headquartered in Los Angeles, California, with more than 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 and is well-reputed internationally for its involvement in numerous high-profile cases. This name is derived from the combination of the surnames of two former partners of the firm and it owns a United States service mark for GIBSON DUNN registered under number 2614712 on September 3, 2002. It also owns various domain names including <gibsondunn.com> which was registered in 1997 and from which it operates its main website.

The disputed domain name was registered on October 16, 2025, and does not resolve to an active website. The Complainant has submitted evidence concerning the only known use of the disputed domain name which has been in connection with an attempt to impersonate a partner in its London Office.

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 it owns registered trademark rights for GIBSON DUNN as noted above and that its mark is wholly incorporated into the disputed domain name and is therefore confusingly similar to it. It says that the addition in the disputed domain name of the descriptive term "-law" does not prevent a finding of confusing similarity.

The Complainant notes that the Respondent, who has withheld its identity through the use of a privacy service can have no rights or legitimate interests in the disputed domain name. It confirms that the Respondent has no affiliation with the Complainant, nor does it have a licence to use the "Gibson Dunn" name or mark. Neither, says the Complainant is the Respondent using the disputed domain name in connection with a bona fide offering of goods or services.

The Complainant submits that the disputed domain name is clearly intended to confuse Internet users into believing this domain name belongs to the Complainant. It notes that this is a common tactic for phishing schemes, where individuals seek to pass themselves off as prominent law firms in the hope of seeking confidential information and, ultimately, transfers of funds from current or potential clients of those law firms or other third parties. In this case the Complainant contends that the Respondent's only known use of the disputed domain name has been in connection with several attempts to impersonate a partner in the Complainant's London office.

Evidence submitted by the Complainant of the fraudulent misuse of the disputed domain name in this regard includes details sent to the Complainant by third parties who had been sent WhatsApp messages impersonating the Complainant's partner, emails allegedly from her and based on the disputed domain name using the formula "name@gibsondunn-law.com" and the transcript of a voicemail message. There were several incidences of attempted impersonation and fraudulent use of the partner's name in late 2025.

The Complainant submits that this conduct was intended to help convince the targeted third parties that a legitimate transaction was taking place and, ultimately to cause them to share confidential information or send funds to the Respondent and that the Respondent's use of the disputed domain name in this fashion clearly establishes the Respondent's prior knowledge of the GIBSON DUNN mark. The Complainant submits that the Respondent's use of the disputed domain name in an apparent phishing scheme cannot give rise to any rights or legitimate interests on the part of the Respondent.

The Complainant notes that panels have consistently found that the mere registration of a domain name that is identical or confusingly similar (particularly domain names comprising typos or incorporating the mark plus a descriptive term) to a famous or widely-known trademark can by itself create a presumption of bad faith. It submits that the disputed domain name is identical to the GIBSON DUNN mark except for the addition of the descriptive term "-law." It says that there is no legitimate or plausible reason for the Respondent to have registered the disputed domain name, especially given the degree of renown attaching to the mark and the existence of the Complainant's legitimate website at the domain name <gibsondunn.com> which is easily located upon a simple Google search.

As far as use in bad faith is concerned, it submits that the use of a domain name for per se illegitimate activity such as phishing is evidence of bad faith. It says that this is true even where there is no active website under the disputed domain and that the Respondent's only use of the mark has been to engage in phishing schemes designed to defraud third parties for commercial gain using the Complainant's name and the name and image of one of its attorneys.

Finally, it says that the use of a privacy registration service to mask a respondent's real identity, as the Respondent has done here, can also serve as an indication of bad faith. The Complainant also says that it believes that the Respondent used false contact information to register the disputed domain name. The Registrar provided the Respondent's contact information in the context of these proceedings. However, none of the Internet searches performed by the Complainant has been able to confirm any legitimate business usage. Further, says the Complainant, the name provided for the Respondent is the name of a Gibson Dunn partner being the same partner who was impersonated in the phishing scheme and which is the only known usage of the disputed domain name. It confirms that the partner concerned has no knowledge of the registration and no affiliation with the street address or contact details given. The Complainant has provided evidence that the street address given is false and does not exist and that the telephone number relates to North America and not to Great Britain. It submits that the provision of false contact information is further evidence of the Respondent's bad faith.

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 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 terms here, “-law” 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. Accordingly, 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.

Panels have held that the use of a domain name for illegitimate or illegal activity here, claimed to be phishing/identity theft or another fraudulent scheme (as further described in Section C below) can never confer rights or legitimate interests on a respondent. [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 disputed domain name was registered in 2025 many decades after the registration of the Complainant’s GIBSON DUNN trademark. This mark enjoys a high level of distinctiveness and has been used extensively by the Complainant for many years in connection with its well-established international legal services business. The Complainant has, since around 1997, operated its main website at <gibsondunn.com> and a simple Google search at the date of registration of the disputed domain name would have revealed this to the Respondent. Considering the use that the Respondent has made since the date of registration of the disputed domain name, namely phishing and false impersonation, the Panel finds that the Respondent must have been aware of the Complainant’s mark and business at that time.

Panels have held that the use of a domain name for illegitimate or illegal activity here, claimed to be phishing/identity theft can never constitute good faith. [WIPO Overview 3.1](#), section 3.4. Having reviewed the record, the Panel finds that the Respondent’s registration and use of the disputed domain name constitute bad faith under the Policy.

The Respondent has registered and used the disputed domain name to masquerade as one of the Complainant's partners for the apparent purpose of defrauding third parties for commercial gain. Based on the evidence submitted by the Complainant, which included WhatsApp, email and voicemail transcript evidence, the Respondent, falsely representing itself as one of the Complainant's partners, has on several occasions, used the disputed domain name in a phishing, or other fraudulent scheme, to help convince targeted third parties that a legitimate transaction was taking place and ultimately to cause them to share confidential information or to send funds to the Respondent. The registration by the Respondent of the disputed domain name in the Complainant's partner's name and using the disputed domain name to falsely represent itself as the same partner amounts to identity theft. The Respondent's use of what appears to be false contact details upon registering the disputed domain name only serves to reinforce the Panel's view of the Respondent's bad faith. It is apparent that the Respondent's intent from the outset was to register and use the disputed domain name to help it in its fraudulent and illegal activity.

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 <gibsonduinn-law.com> be transferred to the Complainant.

/Alistair Payne/

Alistair Payne

Presiding Panelist

/Phillip V. Marano/

Phillip V. Marano

Panelist

/Ian Lowe/

Ian Lowe

Panelist

Date: May 5, 2026