

ADMINISTRATIVE PANEL DECISION

Latham & Watkins LLP v. Watkin Latham, Latham Watkins
Case No. D2026-1342

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 Watkin Latham, Latham Watkins, United States.

2. The Domain Name and Registrar

The disputed domain name <lathamwatkinllp.com> is registered with NameCheap, Inc. (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on March 27, 2026. On March 30, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On March 31, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name that differed from the named Respondent (Redacted for Privacy, Privacy service provided by Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on the same day, 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 31, 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 April 2, 2026. In accordance with the Rules, paragraph 5, the due date for Response was April 22, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent of its default on April 29, 2026.

The Center appointed Steven Auvil as the sole panelist in this matter on May 6, 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 global law firm founded in 1934, with over 3,500 attorneys across numerous international offices.

The Complainant owns multiple trademark registrations for the LATHAM & WATKINS mark, including: United States Registration No. 2413795, registered December 19, 2000; United States Registration No. 4986824, registered June 28, 2016; United States Registration No. 4976906, registered June 14, 2016; and United States Registration No. 4968228, registered May 31, 2016.

The Complainant has also developed substantial goodwill in the mark through continuous use since 1934 and maintains numerous domain names incorporating the LATHAM & WATKINS mark.

The Respondent registered the disputed domain name on October 15, 2025, and registered through NameCheap, Inc. The disputed domain name is currently inactive and does not resolve to an active website.

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.

First the Complainant contends that the disputed domain name is confusingly similar to the Complainant's LATHAM & WATKINS mark, incorporating the mark with a minor typographical variation, removing the letter "s" in WATKINS and the addition of "llp". Second, the Complainant contends that the Respondent lacks rights or legitimate interests in the disputed domain name, as the Respondent has no authorization from the Complainant to use the LATHAM & WATKINS mark and has not made any bona fide use of the disputed domain name. Finally, the Complainant contends that the disputed domain name was registered and is being used in bad faith, including through typosquatting and passive holding.

The Complainant requests transfer of the domain name.

B. Respondent

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

6. Discussion and Findings

According to paragraph 15(a) of the Rules: "[a] Panel shall decide a complaint on the basis of the statements and documents submitted and in accordance with the Policy, these Rules and any rules and principles of law that it deems applicable." Paragraph 4(a) of the Policy directs that the Complainant must prove each of the following to obtain relief:

- (i) that the disputed domain name is identical or confusingly similar to a trademark or a service mark in which the Complainant has rights;

- (ii) that the Respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) that the disputed domain name has been registered and is being used in bad faith.

In view of the Respondent's failure to submit a Response, the Panel is entitled to accept as true the allegations set forth in the Complaint (unless the evidence is clearly contradictory), and to derive reasonable inferences from the evidence presented.

Based on the foregoing guidance, the Panel makes the following findings and conclusions based on the allegations and evidence contained in the Complaint, and reasonable inferences drawn from the evidence presented.

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 LATHAM & WATKINS marks for the purposes of the Policy. [WIPO Overview 3.1](#), section 1.2.1.

As set forth in [WIPO Overview 3.1](#), section 1.7, when the entirety of a mark is reproduced within the disputed domain name, or "at least a dominant feature of the relevant mark is recognizable in the domain name", the disputed domain name is deemed confusingly similar to the mark for the purposes of the Policy. Further, where the "relevant trademark is recognizable within the disputed domain name, the addition of other terms (whether descriptive, geographical, pejorative, meaningless, or otherwise)" does not prevent a finding of confusing similarity. [WIPO Overview 3.1](#), section 1.8.

The Panel finds the mark is recognizable within the disputed domain name, differing only by the omission of the letter "s" in "Watkins", and the addition of the descriptive term "llp". Such minor modifications do not prevent a finding of confusing similarity and constitute typosquatting. See *Moog Inc. v. James White*, WIPO Case No. [D2018-0886](#).

Further, although the addition of other terms or phrases like "llp" may bear on the assessment of the second and third elements, the Panel finds the addition of such phrase 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.

Additionally, as set forth in section 1.11.1 of the [WIPO Overview 3.1](#), the applicable generic Top-Level Domain ("gTLD") (e.g., ".com" or ".org") is viewed as a standard registration requirement and as such is typically disregarded under the first element's confusing similarity test. As such, the use of ".com" gTLD in the disputed domain name has no bearing on the confusing similarity analysis.

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. Such circumstances include:

- (i) before any notice of the dispute, the Respondent used, or prepared to use, the disputed domain name or a name corresponding to the disputed domain name in connection with a bona fide offering of goods or services;

- (ii) the Respondent (as an individual, business, or other organization) is commonly known by the disputed domain name, even if the Respondent has acquired no trademark or service mark rights; or
- (iii) the Respondent is making a legitimate noncommercial or fair use of the domain name, without intent for commercial gain to misleadingly divert consumers or tarnish the trademark or service mark at issue.

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. No known circumstances support such rights or interests on the part of the Respondent. For example, the Respondent does not appear to be commonly known by the name “latham & watkins”, nor has the Complainant authorized or licensed the Respondent to use its LATHAM & WATKINS mark.

The Respondent has not rebutted the Complainant’s prima facie showing and has not come forward with any evidence demonstrating rights or legitimate interests in the disputed domain name such as those enumerated in the Policy or otherwise.

Further, the absence of any active use of the disputed domain name supports the conclusion that it is not being used for any legitimate purpose.

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.

Paragraph 4(b) of the Policy sets out a list of non-exhaustive circumstances that may indicate that a domain name was registered and used in bad faith, but other circumstances may be relevant in assessing whether a respondent’s registration and use of a domain name is in bad faith. [WIPO Overview 3.1](#), section 3.2.1. Evidence of bad faith includes “by using the domain name, you have intentionally attempted to attract, for commercial gain, Internet users to your web site or other on-line location, by creating a likelihood of confusion with the complainant’s mark as to the source, sponsorship, affiliation, or endorsement of your web site or location or of a product or service on your web site or location”. Policy, paragraph 4(b)(iv).

Having reviewed the record, the Panel finds the Respondent’s registration and use of the disputed domain name constitutes bad faith under paragraph 4(b)(iv) of the Policy based on the totality of circumstances.

First, the Respondent registered the disputed domain name long after the Complainant established rights in LATHAM & WATKINS. Second, the composition of the disputed domain name—incorporates the dominant features of the Complainant’s LATHAM & WATKINS mark, with immaterial differences— supports a finding of typosquatting intended to create a likelihood of confusion for commercial gain under paragraph 4(b)(iv). [WIPO Overview 3.1](#), sections 3.1.4 and 3.2.1. Third, the Respondent’s passive holding of the disputed domain name does not preclude a finding of bad faith in the circumstances of this case, given the distinctiveness of the Complainant’s mark, the lack of any plausible good-faith use, and the Respondent’s

failure to participate in this proceeding. [WIPO Overview 3.1](#), section 3.3. The Panel infers from the Respondent's failure to respond to the Complaint that the Respondent lacks any plausible argument or evidence that could rebut the evidence of bad faith registration and use of the disputed domain name.

The Panel therefore 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 <lathamwatkinllp.com> be transferred to the Complainant.

/Steven Auvil/

Steven Auvil

Sole Panelist

Date: May 20, 2026