

ADMINISTRATIVE PANEL DECISION

Cyber Gravity, LLC. v. Finalround, Inc. (f/k/a Pump Labs, Inc.),
Minghao Guan, Danyun Wang
Case No. D2026-1778

1. The Parties

The Complainant is Cyber Gravity, LLC., United States of America, represented by Jafari Law Group, United States of America.

Respondents are FinalRound, Inc. (f/k/a Pump Labs, Inc.), United States of America; Minghao Guan, United States of America; Danyun Wang, United States of America.

2. The Domain Names and Registrar

The disputed domain names <lockedinai.co>, <lockedinai.info>, <lockedinai.org>, <lockedinai.store> and <lockedinai.xyz> (collectively, the “Disputed Domain Names”) are registered with GoDaddy.com, LLC (the “Registrar”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on April 24, 2026. On April 27, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the Disputed Domain Names. On April 27, 2026, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the Disputed Domain Names which differed from the named Respondent (FinalRound Inc., and Minghao Guan) and contact information in the Complaint. The Center sent an email communication to the Complainant on April 28, 2026, providing the registrant and contact information disclosed by the Registrar, and requesting the Complainant to submit an amendment to the Complaint. The Complainant filed an amended Complaint on April 30, 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 Respondents of the Complaint, and the proceedings commenced on April 30, 2026. In accordance with the Rules, paragraph 5, the due date for Response was May 20, 2026. The Respondents did not submit any response.¹ Accordingly, the Center notified the Respondents' default on May 21, 2026.

The Center appointed David H. Bernstein as the sole panelist in this matter on May 21, 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 Delaware limited liability company that operates a software-as-a-service platform called LOCKEDIN AI that features software for pre-interview screenings, meeting preparation, and resume building. The Complainant owns United States Trademark Registration No. 7,917,908 for LOCKEDIN AI (the "LOCKEDIN AI Mark"), filed on December 6, 2024, and registered on August 26, 2025, in International Class 42. The Complainant's first use of the LOCKEDIN AI Mark in commerce was at least as early as April 30, 2024.

Respondent FinalRound, Inc. operates a competing software-as-a-service platform that offers AI-powered interview preparation services under the FINAL ROUND AI brand. Respondent Minghao Guan is the CEO of FinalRound, Inc. Respondent Danyun Wang is the registrant of the Disputed Domain Names and, according to filings with the California Secretary of State dated July 30, 2024, served as President, Treasurer, Secretary, and Director of FinalRound, Inc. (then known as Pump Labs).

Respondent Danyun Wang registered the Disputed Domain Names on June 4, 2024, using Domains by Proxy, LLC as a privacy protection service and providing a contact email address that appears to be associated with Respondent Minghao Guan. Two of the Disputed Domain Names—<lockedinai.xyz> and <lockedinai.co>—have been transferred to Afternic nameservers (ns3/ns4.afternic.com) and are listed for sale on GoDaddy's Afternic marketplace for USD 10,000 and USD 12,500, respectively. The remaining three Disputed Domain Names—<lockedinai.org>, <lockedinai.info>, and <lockedinai.store>—are parked.

There is unrelated litigation pending between Complainant and Respondents FinalRound, Inc and Minghao Guan: *Pump Labs, Inc., et al. v. Cyber Gravity LLC, et al.*, Case No. 8:24-cv-01910-JVS-DFM (C.D. Cal.) (the "Federal Action"), filed September 3, 2024. The Federal Action involves claims and counterclaims relating to, among other things, copyright infringement, trademark infringement, and unfair competition. The trademark claims in the Federal Action concern the INTERVIEW COPILOT trademark, which is not at issue in these proceedings.

In discovery responses in the Federal Action, Respondent Minghao Guan stated that he first became aware of the Complainant's use of the LOCKEDIN AI Mark on or around June 3, 2024—one day before the Disputed Domain Names were registered—and that he became aware of the Complainant's trademark application for the Mark on or around December 6, 2024. In separate discovery responses in the Federal Action, Respondent FinalRound, Inc. (then known as Pump Labs) admitted that users were redirected from <lockedinai.co> to its website at finalroundai.com "for a short period of time".

¹ Given the absence of a Response, the Panel has carefully reviewed the record to ensure that the Respondents received the opportunity for fair notice of this proceeding. See *Nicole Kidman v. John Zuccarini, d/b/a Cupcake Party*, WIPO Case No. [D2000-1415](#). The Center sent notification of the Complaint to the Respondents by email and courier. Although two of the emails (to the postmaster addresses at two of the Disputed Domain Names) bounced back as being undeliverable, the email sent to the email addresses provided by the Registrar for the Respondents appears to have been received as have the emails sent to counsel for Respondents FinalRound, Inc. and Minghao Guan. The Written Notices sent by courier were also delivered to the address provided by the Registrar and the address for Respondents FinalRound, Inc. and Minghao Guan provided by Complainant's counsel. It thus appears that the Respondents received actual notice of the Complaint by email and courier, but regardless, the Panel finds that the Center has discharged its obligation to provide fair notice to the Respondents as required by the Rules, paragraph 2(a).

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 Names.

First, the Complainant contends that each of the Disputed Domain Names is identical to its LOCKEDIN AI Mark. It alleges that the Disputed Domain Names incorporate the LOCKEDIN AI Mark in its entirety, with the only distinguishing elements being the generic top-level domain ("gTLD") or country code top-level domain ("ccTLD") extensions.

Second, the Complainant contends that the Respondents have no rights or legitimate interests in the Disputed Domain Names. The Complainant alleges it has never authorized the Respondents to use the LOCKEDIN AI Mark, and the Respondents are not commonly known by the Disputed Domain Names.

The Complainant further alleges that the Disputed Domain Names have not been used in connection with a bona fide offering of goods or services. Rather, at least one domain name—<lockedinai.co>—was configured to redirect users to the Respondents' competing website, finalroundai.com, and two of the Disputed Domain Names are now offered for sale. The Complainant emphasizes that the Respondents' awareness of the Complainant's rights in the LOCKEDIN AI Mark at the time the Disputed Domain Names were registered underscores the absence of any legitimate interest.

Third, the Complainant contends that the Disputed Domain Names were registered and are being used in bad faith. The Complainant alleges that the Respondents registered the Disputed Domain Names with knowledge of the Complainant's rights in the LOCKEDIN AI Mark, as evidenced by admissions in the Federal Action that Respondent Minghao Guan became aware of the Complainant's use of the Mark one day before the Disputed Domain Names were registered. This timing, the Complainant alleges, evidences a deliberate strategy to block the Complainant from establishing a coherent online presence, capture user traffic, and benefit from the Complainant's search engine optimization.

The Complainant further contends that the Respondents used the Disputed Domain Names in bad faith by redirecting users from at least one domain name to the Respondents' competing website, thereby attempting to attract Internet users for commercial gain by creating a likelihood of confusion with the LOCKEDIN AI Mark. The Complainant also contends that offering the Disputed Domain Names for sale at inflated prices, maintaining them after the Respondents became aware of the Complainant's trademark application, and registering them using a privacy protection service are additional indicators of bad faith. The Complainant contends that, to the extent any of the Disputed Domain Names are not currently configured as active redirects, passive holding does not defeat a finding of bad faith.

The Panel further notes that the Complainant made a number of allegations regarding a sixth domain name not at issue in this proceeding—<lockedinai.io>—including that it was registered by Respondents using a privacy protection service, that users were redirected from this domain name to the Respondents' website, and that it is now listed for sale for \$15,000. The Complainant states that these allegations are included to provide a complete factual record supporting consolidation of the multiple Respondents, the Respondents' lack of rights or legitimate interests, and bad faith. The Complainant reports that it has filed a parallel proceeding against that domain name under the .IO Domain Name Dispute Resolution Policy.

B. Respondent

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

6. Procedural Rulings

A. Consolidation of Multiple Domain Names and Respondents

Paragraph 3(c) of the Rules provides that a complaint may relate to more than one domain name, provided that the domain names are registered by the same domain name holder. Here, all five Disputed Domain Names - <lockedinai.co>, <lockedinai.info>, <lockedinai.org>, <lockedinai.store>, and <lockedinai.xyz> - are registered under the name of a single registrant, Danyun Wang. Accordingly, the Disputed Domain Names are properly consolidated in the Complaint.

The Complainant has named three Respondents: (i) FinalRound, Inc. (formerly known as Pump Labs, Inc.), a Delaware corporation; (ii) Minghao Guan, individually and as CEO of FinalRound, Inc.; and (iii) Danyun Wang, the registrant of the Disputed Domain Names. Although only Danyun Wang is the registrant of record, the Complainant requests that the Panel treat all three as Respondents on the ground that Danyun Wang registered the Disputed Domain Names for Respondents FinalRound, Inc. and Minghao Guan, who exercise control over the Disputed Domain Names.

Where a complaint is filed against multiple respondents, panels look at whether (i) the domain names or corresponding websites are subject to common control, and (ii) the consolidation would be fair and equitable to all parties. See WIPO Overview of WIPO Panel Views on Select UDRP Questions ([“WIPO Overview 3.1”](#)), paragraph 4.11.2. The Panel finds that both prongs are satisfied.

As to common control, the evidence demonstrates that FinalRound, Inc. and Minghao Guan are the beneficial owners of the Disputed Domain Names. At the time the Disputed Domain Names were registered, Danyun Wang served as President, Treasurer, Secretary, and Director of FinalRound, Inc. (then known as Pump Labs). Minghao Guan is the CEO and controlling principal of FinalRound, Inc., and in discovery responses in the Federal Action, Minghao Guan stated that he is the owner of the Disputed Domain Names. FinalRound, Inc.’s discovery responses further reflect the company’s ability to control the Disputed Domain Names. These facts establish that Danyun Wang registered the Disputed Domain Names as an agent for FinalRound, Inc. and its CEO, Minghao Guan, and the Disputed Domain Names share common control.

As to fairness and equity, the Panel sees no reason why consolidation would be unfair or inequitable to any party. The Respondents have not objected to consolidation, and treating FinalRound, Inc., Minghao Guan, and Danyun Wang as joint Respondents accurately reflects the beneficial ownership and control of the Disputed Domain Names.

Accordingly, the Panel decides to consolidate the disputes regarding the Respondents in a single proceeding.

B. Pending Federal Litigation

The Panel acknowledges the pending Federal Action between the Complainant and the Respondents. The Panel exercises its discretion to proceed to decision on the merits because Complainant has alleged (and the Panel has confirmed) that the concurrent federal district court proceeding does not include the relief sought through this proceeding; namely, transfer of the Disputed Domain Names. [WIPO Overview 3.1](#), section 4.14.

7. Discussion and Findings

According to paragraph 4(a) of the Policy, in order to succeed, a complainant must establish each of the following elements:

- (i) the disputed domain name is identical or confusingly similar to the trademark or service mark in which the complainant has rights;
- (ii) the respondent has no rights or legitimate interests in respect of the disputed domain name; and
- (iii) the disputed domain name has been registered and is being used in bad faith.

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 3.1](#), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy because it owns a valid trademark registration in the United States. [WIPO Overview 3.1](#), section 1.2.1. The registration date of the trademark is considered further below in relation to the third element of paragraph 4(a) of the Policy.

The entirety of the LOCKEDIN AI Mark is reproduced within each of the Disputed Domain Names. The addition of a gTLD (.org, .info, .xyz, .store) or ccTLD (.co) to the Dispute Domain Names is a standard registration requirement and as such may be disregarded under the confusing similarity test under the Policy. [WIPO Overview 3.1](#), section 1.11.1.

The Panel finds the first element of the Policy has been established.

B. Rights or Legitimate Interests

Pursuant to paragraph 4(c) of the Policy, a Respondent may demonstrate its legitimate rights or interest in a domain name with evidence that:

- (i) before any notice of the dispute, Respondent used, or prepared to use, the domain name or a name corresponding to the domain name in connection with a bona fide offering of goods or services;
- (ii) Respondent (as an individual, business, or other organization) has been commonly known by the domain name; or
- (iii) Respondent is 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.

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 that the Complainant has established a prima facie case that the Respondents lack rights or legitimate interests in the Disputed Domain Names. The Complainant has alleged that the Respondents have never been known by the Disputed Domain Names and that the Complainant has never authorized the Respondents to use its LOCKEDIN AI Mark. That Respondent FinalRound, Inc. operates a competing software-as-a-service platform under its distinct FINAL ROUND AI brand makes clear that Respondents are not authorized to use their competitor's mark. Nor are any of the Respondents commonly known by the Disputed Domain Names; to the contrary, Respondents Danyun Wang and Minghao Guan are individuals with no apparent stage name, nickname, or other observed moniker. See [WIPO Overview 3.1](#), section 2.3.

The Disputed Domain Names have further not been used in connection with a bona fide offering of goods or services, and the Respondents are not making a legitimate noncommercial or fair use of the Disputed Domain Names. As the WIPO Overview makes clear, "where there are indications a respondent is targeting a complainant . . . this would undermine any claim to a right or legitimate interest". [WIPO Overview 3.1](#), section 2.10. Here, the evidence of targeting is substantial—the parties are competitors in the AI-powered

interview preparation market; the Disputed Domain Names are identical to Complainant's LOCKEDIN AI Mark; and Respondents registered the Disputed Domain Names the day after Respondent Minghao Guan admitted becoming aware of Complainant's use of the Mark.

Moreover, three of the Disputed Domain Names - <lockedinai.org>, <lockedinai.info>, and <lockedinai.store> - are parked. While the parked pages do not include pay-per-click links, this passive holding does not reflect a legitimate interest in the Disputed Domain Names, particularly because each domain name is identical to Complainant's LOCKEDIN AI Mark, which makes them inherently misleading. See, e.g., *Ecolab USA Inc. v. Eco Lab, Ecolab, Recursos Humanos, Ecolab, Name Redacted Ecolab*, WIPO Case No. [D2026-0321](#); *Sodexo v. Thomas Allain*, WIPO Case No. [D2024-1218](#); *Vente-Privee.Com and Vente-Privee.com IP S.à.r.l. v. 崔郡 (jun cui)*, WIPO Case No. [D2021-1685](#). That the Disputed Domain Names all are identical to the Complainant's trademark means that they carry a high risk of implied affiliation and impersonation. [WIPO Overview 3.1](#), section 2.5.1.

The two other Disputed Domain Names - <lockedinai.co> and <lockedinai.xyz> - are listed for sale. These listings likewise do not constitute a bona fide offering of goods or services because there is no evidence that Respondents registered the Disputed Domain Names to exploit any ordinary dictionary, geographic, or surname meaning as opposed to their trademark value. To the contrary, Respondent FinalRound, Inc. admitted in discovery responses in the Federal Action that <lockedinai.co> was configured to redirect users to its competing website at finalroundai.com. See [WIPO Overview 3.1](#), section 2.5.3.

The Respondents have not rebutted the Complainant's prima facie showing and have not come forward with any relevant evidence demonstrating rights or legitimate interests in the Disputed Domain Names such as those enumerated in the Policy or otherwise. As such, the Complainant has sustained its burden of proving, by a preponderance of the evidence, that the Respondents lack rights or legitimate interests in the Disputed Domain Names.

The Panel finds the second element of the Policy has been established.

C. Registered and Used in Bad Faith

Paragraph 4(b) of the Policy lists circumstances that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith. These listed circumstances are examples that can constitute bad faith registration and use; they are not exclusive.

In the present case, the Panel finds that the Respondents registered and used the Disputed Domain Names in bad faith. The evidence demonstrates that the Respondents registered the Disputed Domain Names with knowledge of the Complainant's LOCKEDIN AI Mark. In discovery responses in the Federal Action, Respondent Minghao Guan admitted that he became aware of the Complainant's use of the LOCKEDIN AI Mark on or around June 3, 2024—which in case of June 3 would be one day before the Disputed Domain Names were registered. In any case, the timing of the Respondents' decision to register five domain names incorporating the entirety of the Complainant's Mark, combined with the parties' competitive relationship, supports an inference that the Disputed Domain Names were registered to disrupt the Complainant's business. See Policy, paragraph 4(b)(iii). Likewise, in the circumstances of this case, where the domain name registrant was a competitor, Respondents' use of a privacy protection service to register the Disputed Domain Names casts further doubt on the intent of Respondents in registering the Disputed Domain Names. See [WIPO Overview 3.1](#), section 3.2.1.

It is also clear that Respondents have used the Disputed Domain Names in bad faith. At least one Disputed Domain Name, <lockedinai.co>, was configured for some period of time to redirect users to the Respondents' competing website, evidencing an intent to attract, for commercial gain, Internet users to its website by creating a likelihood of confusion with the Complainant's mark. See [WIPO Overview 3.1](#), section 3.1.4.

Further evidence of bad faith is that the Respondents registered five domain names, all of which are identical to the Complainant's trademark. This constitutes an improper pattern of registering domain names to prevent the owner of the trademark from reflecting its mark in corresponding domain names in violation of paragraph 4(b)(ii) of the Policy

The Panel finds that the Complainant has established the third element of the Policy.

8. 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 names <lockedinai.co>, <lockedinai.info>, <lockedinai.org>, <lockedinai.store> and <lockedinai.xyz> be transferred to the Complainant.

/David H. Bernstein/

David H. Bernstein

Sole Panelist

Date: May 22, 2026