

## ADMINISTRATIVE PANEL DECISION

Gibson, Dunn & Crutcher LLP v. Isaiah Mark  
Case No. D2026-1831

### 1. The Parties

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

The Respondent is Isaiah Mark, United States.

### 2. The Domain Name and Registrar

The disputed domain name <gibsondunngroup.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 April 29, 2026. On April 29, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On April 30, 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, Withheld for Privacy ehf) and contact information in the Complaint. The Center sent an email communication to the Complainant on May 1, 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 May 6, 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 May 7, 2026. In accordance with the Rules, paragraph 5(a), the due date for Response was May 27, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on May 29, 2026.

The Center appointed Michelle Brownlee, Phillip V. Marano, and Debra J. Stanek as panelists in this matter on June 24, 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 that was founded in 1890 and has been known by the name Gibson Dunn since at least as early as 1911. The firm employs more than 2,000 attorneys in 22 offices throughout the world.

The Complainant owns United States trademark registration number 2,614,712 for the mark GIBSON DUNN in connection with legal services and providing information in the field of law via a website on global computer networks in international class 45, registered on September 3, 2002.

The Complainant has registered multiple domain names consisting of or incorporating the GIBSON DUNN mark, including the domain name <gibsondunn.com>, which it has used to operate a web site since 1997.

The Respondent registered the disputed domain name on November 16, 2025. The disputed domain name redirects to the Complainant's website at <gibsondunn.com>.

#### **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 the disputed domain name is confusingly similar to the Complainant's GIBSON DUNN mark, the Respondent has no rights to or legitimate interests in respect of the disputed domain name and the Respondent registered and is using the disputed domain name in bad faith. In particular, the Complainant argues that it is not a coincidence that the Respondent used the Complainant's GIBSON DUNN trademark in the disputed domain name as it is not a generic or descriptive term with independent meaning, and no party other than the Complainant that would have a legitimate use of the term. The Complainant notes that the Respondent has redirected the disputed domain name to the Complainant's web site and that the Respondent has set up mail exchange (MX) records for the disputed domain name, suggesting that the Respondent intends to use the disputed domain name to send fraudulent emails that appear to originate from the Complainant. The Complainant also argues that the Respondent's use of a privacy registration service to mask the Respondent's identity 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**

To prevail under the Policy a complainant must prove, as to the domain name at issue, that: (a) it is identical or confusingly similar to a mark in which the complainant has rights, (b) respondent has no rights or legitimate interests in respect to it, and (c) it has been registered and is being used in bad faith. Policy, paragraph 4(a). A respondent's failure to respond does not automatically result in a finding for the complainant; the complainant continues to have the burden of establishing each element. Rules, Rules,

paragraphs 5(f) and 14(a); see also WIPO Overview of WIPO Panel Views on Selected UDRP Questions (“[WIPO Overview 3.1](#)”), section 4.3. The Panel may, however, draw appropriate inferences from the default. See Rules, paragraph 14(b).

The Panel determines that “Isaiah Mark” is the appropriate Respondent. See [WIPO Overview 3.1](#), section 4.4.5 (in cases involving a privacy service, Panel has discretion to determine appropriate respondent).

#### **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 its GIBSON DUNN trademark 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, “group”, 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.

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 showing 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 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 registered the disputed domain name that incorporates the Complainant's distinctive GIBSON DUNN trademark and pairs it with the word "group". a term that is commonly used together with a company name to indicate a group of affiliated companies. The Respondent redirected the disputed domain name to the Complainant's web site. The Respondent clearly knows of the Complainant and its GIBSON DUNN mark and is targeting the Complainant using the mark. Further, the Respondent has set up MX records for the disputed domain name. Under the circumstances, this is strong evidence that the Respondent has used or is making preparations to use the disputed domain name to generate email messages that are designed to appear that they originate from the Complainant. The Panel finds that the Respondent has registered and used the disputed domain name in bad faith.

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, <gibsondunnngroup.com> be transferred to the Complainant.

*/Michelle Brownlee/*

**Michelle Brownlee**

Presiding Panelist

*/Phillip V. Marano/*

**Phillip V. Marano**

Panelist

*/Debra J. Stanek/*

**Debra J. Stanek**

Panelist

Date: July 7, 2026