ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Latham & Watkins LLP v. yirun song
Case No. D2026-3989

1. The Parties

Complainant is Latham & Watkins LLP, United States of America ("United States" or "U.S."), internally represented.

Respondent is yirun song, United States.

2. The Domain Name and Registrar

The disputed domain name <lwlegalgroup.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on September 5, 2026. On September 7, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 9, 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 (Registration Private, Domains By Proxy, LLC) and contact information in the Complaint. The Center sent an email communication to Complainant on September 10, 2026, providing the registrant and contact information disclosed by the Registrar, and inviting Complainant to submit an amendment to the Complaint. Complainant filed an amended Complaint on September 11, 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 Respondent of the Complaint, and the proceedings commenced on September 17, 2026. In accordance with the Rules, paragraph 5, the due date for Response was October 7, 2026. Respondent did not submit any response. Accordingly, the Center notified Respondent's default on October 9, 2026.

The Center appointed Clark W. Lackert as the sole panelist in this matter on October 16, 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

Since its founding in Los Angeles, California, U.S., in 1934, Complainant has offered professional legal services under the LATHAM & WATKINS trademark and associated logos and terms including the abbreviation LW (the "Marks"). Through extensive use and advertising of the Marks, the Marks have developed a strong reputation worldwide among clients and the legal industry. Further, Complainant has also established common-law rights to the Marks through extensive use and promotion of the marks for many decades.

In addition to trademark rights from use, Complainant has registered the Marks around the world, including the following:

Mark	Country	Registration Number	Registration Date
LATHAM & WATKINS	United States	2413795	December 19, 2000
LATHAM & WATKINS	United States	4986824	June 28, 2016
LATHAM & WATKINS	United States	4976906	June 14, 2016
LATHAM & WATKINS	United States	4968228	May 31, 2016
LW in Square	United States	8146386	February 17, 2026
LW in Square	United States	8146387	February 17, 2026
LW in Square	United States	8188651	March 24, 2026
LW in Square	United Kingdom	UK00004113277	January 17, 2025
LW in Square	Germany	302024119681	May 13, 2025

Complainant uses the domain name <lw.com> for one of its principal websites and email services.

The disputed domain name was registered on April 7, 2026.

The disputed domain name resolves to a website displaying Complainant's LATHAM & WATKINS trademark, the LW logo in the browser tab, a retired partner's identity, and a copyright notice in Complainant's name. The website purport to offer assistance recovering losses from cryptocurrency and financial scams, invited visitors to obtain a "free case analysis", and claimed more than 2,400 cases investigated and an 87 percent recovery rate.

5. Parties' Contentions

A. Complainant

Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

The disputed domain name is identical or confusingly similar to Complainant's trademark.

The Marks are well-known and famous throughout the United States and internationally and they impart substantial goodwill to Complainant. See, for example, *Latham & Watkins LLP v. nathaniel webber*, WIPO Case No. D2023-1964: ("[c]omplainant has used the LW Mark extensively across its significant digital media presence in association with its legal and other services. Third-party publications have also referenced [c]omplainant using the LW Mark, as evidenced by [c]omplainant.").

To maintain its reputation for high-quality legal services, and to protect its clients and the public from malicious actors, Complainant has registered its trademark rights internationally and frequently asserted its trademark rights to prevent domain name abuse in similar proceedings. Over the last few years, Complainant has successfully convinced numerous panels to transfer abusive domain names incorporating these marks. See, e.g., *Latham & Watkins LLP v. Robert Joanne*, WIPO Case No. D2023-2161 (ordering transfer of <latham-llp.com> domain name); *Latham & Watkins LLP v. nathaniel webber*, WIPO Case No. D2023-1964 (ordering transfer of <us-lw.com> domain name); and *Latham & Watkins LLP v. Domains By Proxy, LLC / benson johnson*, WIPO Case No. D2022-2118 (ordering transfer of <lathamswatkins.com> domain name), among others.

The disputed domain name is clearly intended to imitate the Marks and Complainant's legitimate domain name <lw.com>. The disputed domain name adds only the descriptive terms "legal" and "group", imitating the legal services of Complainant, which is merely informative and does not add any distinctiveness. In short, the disputed domain name is nearly identical to Complainant's globally recognized and valuable Marks, and Respondent's use of the disputed domain name will cause clients and others in the legal industry to mistakenly believe that the disputed domain name is affiliated with Complainant's Marks when it is not.

Respondent has no rights or legitimate interests in the disputed domain name.

Respondent has not been authorized by Complainant to register or use the disputed domain name or to seek the registration of any domain name incorporating the Marks. Respondent cannot claim any legitimate rights to the disputed domain name absent some relationship to Complainant because the strong and famous Marks have no other meaning but to identify Complainant and its services. Respondent's contact, administrative, and technical information from the WhoIs database do not reveal any rights or interest in the domain name or in any way indicate Respondent is commonly known by Complainant's mark. For all these reasons, Respondent has no right or legitimate interest in the disputed domain name.

The disputed domain name has been registered and is being used in bad faith.

Respondent's knowing violations of Complainant's trademark rights is per se a bad faith registration and use of the disputed domain name. See, e.g., *Six Continents Hotel, Inc. v. Ramada Inn*, WIPO Case No. D2003-0658 ("when someone registers a domain name, he represents and warrants to the registrar that, to his knowledge, the registration of the domain name will not infringe the rights of any third party"); *Latham & Watkins LLP v. Registration Private, Domains By Proxy, LLC / Barbara Jason*, WIPO Case No. D2021-2238 ("A respondent's use of a complainant's mark – for said respondent's commercial benefit – to attract Internet users otherwise seeking said complainant evinces a finding of bad faith is also consistent with the Policy paragraph 4(b)(iv)."). Given Complainant's longstanding, globally known Marks and Respondent's use of its identical LW mark with the descriptive terms "legal" and "group", there can be no rational debate that Respondent was well aware of the Marks and intended to violate Complainant's rights through the confusingly similar domain name that incorporates the entirety of Complainant's Mark.

Moreover, the disputed domain name incorporates wholesale Complainant's LW mark and therefore can only sensibly refer to Complainant and there is no obvious possible justification for Respondent's selection of the disputed domain name other than bad faith. See *Latham & Watkins LLP v. Name Redacted*, WIPO Case No. D2021-2877 ("it is 'not possible to conceive of a plausible situation in which the [r]espondent would have been unaware of' [c]omplainant's brand at the time the Domain Name was registered."). Additionally, Respondent used the disputed domain name to impersonate Complainant and purportedly offer legal services that are similar to those services actually offered by Complainant. This, by itself, reveals bad faith. *Latham & Watkins LLP v. ckdsaw*, WIPO Case No. D2024-5133 ("In light of the extensive use of the [c]omplainant's LATHAM & WATKINS trademark and the fact that the disputed domain names resolved to websites that apparently attempted to impersonate the [c]omplainant, the [p]anel has no doubt that the [r]espondent was aware of [c]omplainant and [c]omplainant's trademark rights when registering the disputed domain names."). For all these reasons, Respondent has registered the disputed domain name in bad faith.

B. Respondent

Respondent is in default and did not reply to 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 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.

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, the descriptive words "legal" and "group", may bear on assessment of the second and third elements, the Panel finds the addition of such terms 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 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 Complainant has established a prima facie case that Respondent lacks rights or legitimate interests in the disputed domain name. Respondent has not rebutted 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. WIPO Overview 3.1, section 2.1.

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.

The Panel finds that Respondent knew of and targeted Complainant when registering the disputed domain name. Complainant's registered rights predate the April 7, 2026, registration of the disputed domain name. The combination of Complainant's LW mark with terms "legal" and "group", together with the website's use of Complainant's Marks, full name, logo, and retired partner's identity, supports the inference that the domain name was selected to impersonate Complainant, rather than for an unrelated meaning of LW.

The website's solicitation of prospective clients for purported scam-recovery services under Complainant's identity also supports a finding that Respondent intentionally attempted to attract Internet users for commercial gain by creating confusion as to the source, sponsorship, affiliation, or endorsement of the website and its services, within paragraph 4(b)(iv) of the Policy. Offering an initial case analysis without charge does not negate the commercial purpose inferred from the overall presentation. Proof that a visitor actually paid money or suffered loss is not required to establish the intentional attempt described in that paragraph.

Respondent's use of a privacy service is not, by itself, evidence of bad faith. WIPO Overview 3.1, section 3.6. In the present case, the website's impersonation of Complainant establishes bad faith independently of the use of that service.

The evidenced impersonation and passing off establish bad faith use and reinforce the finding of deliberate targeting at registration. WIPO Overview 3.1, section 3.1.4. Having reviewed the record, the Panel finds that the disputed domain name was registered and is being used in bad faith under the Policy.

The Panel finds that 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 <lwlegalgroup.com> be transferred to Complainant.

/Clark W. Lackert/
Clark W. Lackert
Sole Panelist
Date: October 30, 2026