ARBITRATION
AND
MEDIATION CENTER

WIPO
WORLD
INTELLECTUAL PROPERTY
ORGANIZATION

ADMINISTRATIVE PANEL DECISION
Debevoise & Plimpton LLP v. LE PHUC DUY AN
Case No. D2026-4772

1. The Parties

The Complainant is Debevoise & Plimpton LLP, United States of America ("United States"), represented by Debevoise & Plimpton LLP, United States.

The Respondent is LE PHUC DUY AN, Viet Nam.

2. The Domain Name and Registrar

The disputed domain name <debevoiselaw.com> is registered with iNET Software Company Limited (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 20, 2026. On October 21, 2026, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 22, 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 (Domain Admin, C/O ID#10760 Privacy Protection Service INC d/b/a PrivacyProtect.org) and contact information in the Complaint. The Center sent an email communication to the Complainant on October 22, 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 amendment to the Complaint on October 22, 2026.

The Center verified that the Complaint together with the amendment to the 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 October 23, 2026. In accordance with the Rules, paragraph 5, the due date for Response was November 12, 2026.

On October 24, 2026, the Respondent sent an email communication to the Center, stating that she does not intend to dispute this case, that she was "fully willing to agree to the settlement and transfer/cancellation of the disputed domain name" to the Complainant, and requesting to suspend the proceedings so that the parties may execute the standard settlement form to be provided by WIPO. On the same day, the Complainant sent to the Center an executed copy of the settlement agreement form requesting the Respondent's approval. On October 28, 2026, the Complainant sent an email communication to the Center stating that, having heard nothing from the Respondent on the stipulation of a settlement, the Complainant does not agree to stay these proceedings and maintains its request for expedited resolution.

The Center appointed Andrea Mondini as the sole panelist in this matter on November 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

The Complainant is a commercial law firm founded in 1931 with principal place of business in New York, United States.

The Complainant is the owner of several trademark registrations, including the United States Trademark Registrations No. 2513942 for DEBEVOISE & PLIMPTON, registered on December 4, 2001, and No. 2777096 for DEBEVOISE, registered on October 28, 2003.

The Complainant holds the domain name <debevoise.com> which hosts its main website.

The Respondent did not file a formal Response.

The disputed domain name was registered on November 18, 2025.

According to the evidence submitted with the Complaint, the disputed domain name does not resolve to an active website but has been used to send phishing emails impersonating the Complainant.

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 as follows:

The Complainant is a globally recognized law firm that has provided legal services under the trademarks DEBEVOISE and DEBEVOISE & PLIMPTON for decades. The disputed domain name is confusingly similar to the DEBEVOISE trademark in which the Complainant has rights, because it incorporates this trademark in its entirety, and the addition of the descriptive term "law" does not avoid a confusing similarity, but rather increases it because the Complainant is a law firm engaged in the practice of law.

The Respondent has no rights or legitimate interests in respect of the disputed domain name. The Respondent has not been authorized by the Complainant to use this trademark, is not commonly known by the disputed domain name, and there is no evidence of the Respondent's use, or demonstrable preparation to use, the disputed domain name in connection with a bona fide offering of goods and services. To the contrary, the Respondent used the disputed domain name to send phishing emails impersonating the Complainant and soliciting payments under the pretext of conducting legal work as part of a coordinated

phishing scheme targeting owners of intellectual property in the apparel industry under the guise of initiating settlement negotiations. The Respondent's malicious impersonation of the Complainant demonstrates that the Respondent is not engaged in any legitimate business using the disputed domain name.

The disputed domain name was registered in bad faith because it is obvious that the Respondent had knowledge of both the Complainant and its well-known trademark DEBEVOISE at the time it registered the disputed domain name considering that it combines the Complainant's trademark with the term "law" which relates to the Complainant's business operations.

The Respondent is using the disputed domain name in bad faith, by impersonating the Complainant to send phishing emails.

B. Respondent

The Respondent did not file a formal Response.

On October 24, 2026, the Respondent sent an email communication to the Center, stating her intention to settle this case, but after receipt of the settlement agreement form signed by the Complainant, the Respondent failed to return a signed copy to the Center.

In the present case, despite the Respondent's consent, because the Respondent failed to sign the settlement agreement form, the Panel in its discretion still finds it appropriate to proceed to a substantive decision on the merits.

6. 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 a 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.

6. 1 Language of the Proceedings

While the Registration Agreement for the disputed domain name is in Vietnamese, the Complainant requested in the Complaint that English be designated as the language of these proceedings. The Complainant pointed out that (i) the privacy service used by the Respondent has a principal address in Australia, (ii) the Complainant is a United States law firm conducting business primarily in English, and (iii) the disputed domain name was used to send fraudulent phishing emails in English.

Paragraph 11(a) of the Rules stipulates that, "unless otherwise agreed by the Parties, or specified otherwise in the Registration Agreement, the language of the administrative proceeding shall be the language of the Registration Agreement, subject to the authority of the Panel to determine otherwise, having regard to the circumstances of the administrative proceeding".

Taking into account the circumstances of this case, the Panel does not consider it prejudicial to the Respondent if English were adopted as the language of the proceedings. Considering that the relevant case-related communications were sent in both English and Vietnamese, that the disputed domain name was used to send emails in English, and that on October 24, 2026 the Respondent sent an email communication to the Center in English, the Panel finds it appropriate to exercise its discretion according to paragraph 11(a) of the Rules and allow the proceedings to be conducted in English.

6.2 Substantive Issues

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 Panel finds the entirety of the mark is reproduced within the disputed domain name.

Although the addition of other terms such as here "law" may bear on assessment of the second and third elements, the Panel finds that in the present case 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 addition of the generic Top-Level Domain ("gTLD") ".com" in the disputed domain name is a standard registration requirement and as such may be disregarded under the confusing similarity test under the Policy, paragraph 4(a)(i). 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

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 for a complainant to prove 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.

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. To the contrary, in her communication sent to the Center on October 24, 2026, the Respondent stated that she "does not intend to dispute this case".

Panels have held that the use of a domain name for illegal activity such as here impersonating the Complainant and sending phishing emails can never confer rights or legitimate interests on a respondent. WIPO Overview 3.1, section 2.13.1.

Furthermore, the composition of the disputed domain name itself suggests a connection or implied affiliation between the Complainant and the Respondent which in fact does not exist. WIPO Overview 3.1, section 2.5.1

Based on the available record, 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. WIPO Overview 3.1, section 3.2.1.

In the view of the Panel, noting that the Complainant's trademark registration predates the registration of the disputed domain name and considering that the disputed domain name combines the Complainant's trademark with a term relating to the Complainant's business operations, it is obvious that the Respondent had knowledge of both the Complainant and its trademark DEBEVOISE at the time it registered the disputed domain name. In the circumstances of this case, this is evidence of registration in bad faith.

The record shows that the Respondent is using the disputed domain name in bad faith, by impersonating the Complainant to send phishing emails. Panels have held that the use of a domain name for illegal activity such as in the present case impersonating the Complainant and engaging in phishing activities constitutes bad faith registration and use. WIPO Overview 3.1, section 3.4.

Based on the available record, the Panel finds that the Complainant has established the third element of the Policy with regard to the disputed domain name.

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 <debevoiselaw.com> be transferred to the Complainant.

/Andrea Mondini/
Andrea Mondini
Sole Panelist
Date: November 16, 2026