

## **ADMINISTRATIVE PANEL DECISION**

LinkedIn Corporation v. Milad Mehri, pinpoint  
Case No. DCO2025-0079

### **1. The Parties**

The Complainant is LinkedIn Corporation, United States of America, represented by The GigaLaw Firm, Douglas M. Isenberg, Attorney at Law, LLC, United States of America.

The Respondent is Milad Mehri, pinpoint, Canada.

### **2. The Domain Name and Registrar**

The disputed domain name <playpinpoint.co> is registered with Porkbun LLC (the “Registrar”).

### **3. Procedural History**

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on September 19, 2025. On September 19, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On September 20, 2025, 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 (Private by Design, LLC) and contact information in the Complaint. The Center sent an email communication to the Complainant on September 22, 2025, 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 September 22, 2025.

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 September 26, 2025. In accordance with the Rules, paragraph 5, the due date for Response was October 16, 2025. The Respondent did not submit any response. Accordingly, the Center notified the Respondent’s default on October 17, 2025.

The Center appointed Torsten Bettinger as the sole panelist in this matter on October 22, 2025. 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 corporation established under the laws of the State of Delaware, United States.

The LinkedIn social media platform was launched in 2003 and now connects more than 1 billion professionals in more than 200 countries and regions. The Complainant became a public company in 2011, and until Microsoft Corporation acquired the Complainant in 2016. The Complainant has more than 18,500 full-time employees with 38 offices in cities around the world and operates websites in 36 languages, including a principal website at “www.linkedin.com”.

The Complainant offers a number of games on its website, including a word association game called “Pinpoint”, which it announced on April 30, 2024.

The Complainant is the owner of a United States trademark registration No. 7,699,357 for PINPOINT registered on February 18, 2025, for use in connection with, inter alia, “entertainment services, namely, providing online electronic recreational games”.

The disputed domain name was registered on April 19, 2024. The Respondent uses the disputed domain name for a website offering a word association game called “Pinpoint”, which also displays advertisements.

The Respondent did not reply to Complainant’s demand letter dated July 29, 2025.

#### **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.

With regard to the requirement of “identity or confusing similarity between the trademark and the domain name” pursuant to paragraph 4(a)(i) of the Policy, the Complainant submits that:

- the disputed domain name is confusingly similar to the Complainant’s PINPOINT trademark, as it incorporates the mark in its entirety, merely adding the descriptive term “play”;
- the inclusion of the word “play” may in fact heighten confusion, as it describes the very nature of the Complainant’s gaming services; and
- the country-code Top-Level domain “.co” is disregarded for comparison purposes.

With regard to the Respondent having no rights or legitimate interests in the disputed domain name, the Complainant submitted that:

- the Complainant has never authorized, licensed, or permitted the Respondent to use or register the PINPOINT trademark in any form;
- the Respondent is using the disputed domain name to operate a website offering a word association game identical to the Complainant’s services under the PINPOINT mark and displaying advertisements for commercial gain;
- there is no evidence that the Respondent has ever been commonly known by the disputed domain name or has acquired any trademark rights in it;

- by using the domain name in a manner that misleads Internet users and creates initial interest confusion with the Complainant's trademark, the Respondent cannot claim any rights or legitimate interests; and
- the inclusion of advertising links confirms that the use is commercial and misleading, not fair or descriptive.

Finally, with regard to the disputed domain name having been registered and being used in bad faith, the Complainant argues that:

- the circumstances indicate that the Respondent's intent was to disrupt the Complainant's business and to attract Internet users for commercial gain by creating confusion with the Complainant's PINPOINT trademark, in violation of paragraphs 4(b)(iii) and 4(b)(iv) of the Policy;
- the domain name incorporates the PINPOINT mark together with a term ("play") directly associated with the Complainant's services and is used for a website offering identical word association games, demonstrating opportunistic bad faith and clear awareness of the Complainant's rights;
- the Respondent's failure to respond to the Complainant's cease-and-desist letter reinforces this finding; and
- these facts show that the Respondent knowingly sought to profit from confusion with the Complainant's trademark and therefore registered and used the domain name in bad faith under paragraph 4(a)(iii) of the Policy.

## **B. Respondent**

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

## **6. Discussion and Findings**

Paragraph 4(a) of the Policy states that the Complainant must prove each of the three following elements:

- (i) the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights; and
- (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 of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), section 1.7.

The Complainant has shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain name reproduces the PINPOINT mark in its entirety with the mere addition of the descriptive term "play".

Although the addition of the dictionary term "play" may bear on the assessment under the second and third elements, those terms do not preclude a finding of confusing similarity for the purposes of the Policy. See [WIPO Overview 3.0](#), section 1.8.

Accordingly, the disputed domain name is confusingly similar to the mark for the purposes of the Policy.

## **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 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 3.0](#), section 2.1.

The record contains no evidence that the Respondent is licensed, authorized, or otherwise permitted to use the PINPOINT mark, nor that the Respondent is commonly known by PINPOINT (paragraph 4(c)(ii) of the Policy).

The disputed domain name wholly incorporates the mark with the addition of the term “play”. Such composition carries a risk of implied affiliation and does not confer rights or legitimate interests. Where a domain name suggests sponsorship or endorsement by the trademark owner, panels routinely find that any commercial use is not bona fide. [WIPO Overview 3.0](#), section 2.5.1. On this basis, the Complainant has made a prima facie showing that the Respondent lacks rights or legitimate interests.

The disputed domain name resolves to a website offering a word association game identical to that provided by the Complainant under its PINPOINT mark. The website also displays advertisements for commercial gain. Such use cannot be considered a bona fide offering of goods or services under paragraph 4(c)(i) of the Policy, nor a legitimate noncommercial or fair use under paragraph 4(c)(iii), as it trades on the goodwill of the Complainant’s trademark and seeks to attract Internet users by creating confusion as to source or affiliation.

On this record, there is also no evidence of a bona fide offering of goods or services before notice of the dispute (paragraph 4(c)(i) of the Policy or legitimate noncommercial or fair use paragraph 4(c)(iii) of the Policy).

Although, afforded the opportunity, the Respondent has not come forward with any circumstances under paragraph 4(c) of the Policy (or otherwise) to demonstrate rights or legitimate interests.

In the absence of any evidence rebutting the Complainant’s prima facie case, the Panel finds that the Respondent has no rights or legitimate interests in the disputed domain name. The requirement of paragraph 4(a)(ii) of the Policy is therefore satisfied.

## **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.

### **1. Bad faith registration**

The Complainant owns a PINPOINT trademark registration that predates the registration of the disputed domain name by the Respondent.

At the time of registration, the Complainant's PINPOINT trademark was already well-established and publicly known in connection with word association and linguistic puzzle-based services. The Respondent selected a domain name that combines the Complainant's distinctive PINPOINT mark with the descriptive term "play", which directly relates to the very nature of the Complainant's services (i.e., playing a word-association game).

This suggests that the Respondent registered the disputed domain name with knowledge of the Complainant and its business and with the intent to create an immediate association between the disputed domain name and the Complainant's trademark.

Accordingly, the disputed domain name was registered in bad faith.

## **2. Bad faith Use**

The Panel also finds bad-faith use. By operating a website that directly mirrors the Complainant's services, while displaying advertising links and monetized content the Respondent is intentionally attracting Internet users for commercial gain by creating a likelihood of confusion as to source, sponsorship, affiliation, or endorsement, squarely within paragraph 4(b)(iv) of the Policy. Panels regard such passing-off use as paradigmatic bad faith use and also note the associated disruption of the Complainant's business (paragraph 4(b)(iii) of the Policy).

The Panel therefore concludes that the Respondent registered the disputed domain name in bad faith.

## **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 <playpinpoint.co> be transferred to the Complainant.

*/Torsten Bettinger/*

**Torsten Bettinger**

Sole Panelist

Date: November 5, 2025