

IMMEDIATE  
COURT ORDER  
BY EMAIL & DoT Website

Government of India  
Ministry of Communications  
Department of Telecommunications  
Sanchar Bhawan, 20, Ashoka Road, New Delhi - 110 001  
(Data Services Cell)

No. 813-07/LM-37/2021-DS-II

Dated:07.03.2023

To,  
All Internet Service Licensees'

Subject: CS (COMM) No. 605 of 2021; Universal City Studios LLC & Ors. v/s dramacool.news & Ors. before Hon'ble Delhi High Court.

Kindly refer to the following:

- (i) Hon'ble Delhi High Court order dated 24.02.23 on the subject.
- (ii) Para 7 of Hon'ble Delhi High Court order dated 26.11.21 regarding blocking of website identified by plaintiff.
- (iii) Affidavit of the Plaintiff dated 22.02.23
- (iv) Memo of Parties in CS (Comm) No. 605 of 2021

(Copies enclosed for ready reference),

2. In view of the above all the Internet Service licensees are hereby instructed to take immediate necessary action for blocking access to websites of defendants no. 55 to 68.

*Sanidhya Rao*  
07.03.23

Director (DS-II)  
Tel: 011-2303 6860  
Email: dirds2-dot@nic.in

Encl: A/A  
Copy to:

- (i) V.Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi (Respondent no. 48) for kind information and necessary action.
- (ii) Sanidhya Rao, Saikrishna & Associates (sanidhya@saikrishnaassociates.com) Advocate for the Plaintiffs for kind information.
- (iii) IT wing of DoT for uploading on DoT website.

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\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

+ CS(COMM) 605/2021

UNIVERSAL CITY STUDIOS LLC AND ORS

..... Plaintiff

Through: Ms. R.Ramya, Mr. Raghav  
Goyal, Ms. Sannidhya Rao  
and Ms. Mehr Sidhu,  
Advocates (M: 9845057827)

versus

DRAMACOOOL.NEWS AND ORS

..... Defendant

Through: Mr. Ajay Diggpaul, Adv.  
For D-35 & 36  
Mr. Vikram Jetly with  
Ms. Shreya Jetly, Advocates  
for D-47 and 48  
(M: 9811157321)

**CORAM:**

**SIDHARTH MATHUR (DHJS), JOINT REGISTRAR  
(JUDICIAL)**

**ORDER**

**24.02.2023**

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List the matter for the date already fixed i.e.  
**13.03.2023.**

In the meantime, summons be issued to defendants no  
55 to 68 through all permissible modes.

**I.A.No 3758/23 (under Order I Rule 10 CPC moved by  
plaintiff)**

The plaintiffs are seeking to implead additional  
mirrors/links/URLs/redirects as mentioned in Para no 2  
whereby the copyrighted contents of the plaintiffs are being  
illegally distributed. The record suggests that similar orders  
were passed earlier as well in this suit whereby such like  
mirrors were impleaded. There is no reason to disbelieve the

contents of this application.

Keeping in view the overall circumstances, the application is allowed and the additional mirrors/links/URLs/redirects as mentioned in Para no 2 are impleaded as defendants no. 55 to 68.

These newly impleaded defendants shall obviously be subject to the interim directions dated 26.11.2021.

The plaintiffs have already filed the amended memorandum of parties.

**SIDHARTH MATHUR (DHJS)  
JOINT REGISTRAR (JUDICIAL)**

**FEBRUARY 24, 2023/PU**

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\* **IN THE HIGH COURT OF DELHI AT NEW DELHI**  
+ **CS(COMM) 605/2021**

UNIVERSAL CITY STUDIOS LLC AND ORS ..... Plaintiffs

Through: Mr.Sidharth Chopra, Ms.Suhasini  
Raina, Ms.Disha Sharma, Ms.Surabhi  
Pande and Ms.Sanidhya Rao,  
Advocates.

versus

DRAMACOOOL.NEWS AND ORS ..... Defendants

Through: None.

**CORAM:**

**HON'BLE MR. JUSTICE YOGESH KHANNA**

**ORDER**

% **26.11.2021**

**I.A. Nos. 15474/2021 and 15476/2021**

1. Exemption allowed, subject to all just exceptions.
2. The application/s stand disposed of.

**CS(COMM) 605/2021, I.A. Nos. 15473/2021 and 15475/2021**

3. Plaintiffs have filed this suit for permanent injunction for infringing the plaintiffs' exclusive rights, copyright, rendition of accounts and damages etc against the defendants.
4. Summons of the suit and notice of applications be issued to the defendants through all modes/email and whatsapp returnable on 10.03.2022 before the learned Joint Registrar.
5. It is alleged the plaintiffs No.1to 6 are a leading global entertainment companies engaged in the business of creation, production, distribution of motion pictures / cinematograph films. The plaintiffs have exclusive rights to communicate their contents. No other entity can, without authorization from the Plaintiff, upload, stream, make available for download, communicate to the public the plaintiffs' content i.e. films and series etc.

6. The plaintiffs have further observed that the defendants No.1-25 (“*Rogue Websites*”) herein are engaged in primarily and substantially making available for the public hosting/download/streaming/communicating the plaintiff’s content without authorisation.

7. The defendants No.26 - 34 are *Internet Service Providers* which are being arrayed for the limited purpose of blocking / restricting access to the rogue websites identified in the present suit or any other website(s). The defendants No.35-36 are Department of Telecommunication and Ministry of Electronics and Information Technology respectively which are government department and being arrayed for the limited purpose of issuing notification calling upon the internet and telecom service providers to block access to the Rogue Defendants’ websites identified in the present suit, as also such other websites which are subsequently discovered to be infringing the rights of the plaintiff. The defendant No. 37 is “Ashok Kumar(s)”. No formal relief has been sought against the Defendant Nos.26-36. The defendants No.1-25 are anonymous websites and their details of owners are hidden or are forged /inaccurate. These websites are vehicles of infringement and engaged in flagrant violation of the Intellectual Property Rights of the plaintiffs, hence the present suit. To prove the allegations of infringement of plaintiffs’ exclusive right in its contents, the plaintiffs have also filed various documents on record.

8. In view of above, the plaintiff has made out a *prima facie* case and in case the defendants are not restrained *ex parte*, the plaintiffs shall suffer irreparable loss and injury.

9. Accordingly, till the next date of hearing, the defendants are restrained in terms of prayers No.5(i) to 5(iii) of the injunction application.

10. Compliance of Order 39 Rule 3 of the CPC be made within ten days.
11. The defendants No.26 to 36 shall take immediate steps to comply with above order.
12. Upon completion of service/pleadings, the matter be listed before this Court.
13. Order *dasti*.

**YOGESH KHANNA, J**

**NOVEMBER 26, 2021**

*M*

IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. \_\_\_\_\_ OF 2023

IN

CS(COMM) NO. 605 OF 2021

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Dramacool.news & Ors. ...Defendants

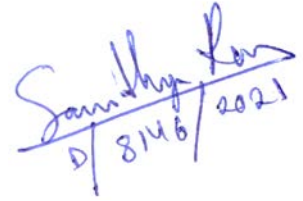
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1.	Notice of Motion	
2.	Urgent Application	
3.	Application on behalf of the Plaintiffs under Order I Rule 10 of The Code of Civil Procedure, 1908 seeking impleadment of additional website along with Supporting Affidavit.	
4.	Amended Memo of Parties	

5.	Copy of Order dated 26.11.2021 in CS(COMM) 605/2021.	
6.	Copy of Order dated 11.11.2022 in CS(COMM) 605/2021.	
7.	Copy of Judgment dated 10.04.2019 in CS(COMM) 724/ 2017, UTV Software Communications Ltd. & Ors. v. 1337x.to & Ors.	
8.	Copy of Order dated 14.12.2022 in CS(COMM) 605/2021.	
9.	Service Affidavit with Proof of Service	

Place: New Delhi

Date: 22<sup>nd</sup> February 2023



Anjali Agrawal | Sanidhya Rao  
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates

Advocates for the Plaintiffs

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[sanidhya@saikrishnaassociates.com](mailto:sanidhya@saikrishnaassociates.com)



NOTE: The present application is being filed in a Website blocking suit. The Email ID of newly impleaded websites, i.e., Defendant No. 55-68, are the only publicly available contact details and have been served with a copy of the present application on the said Email IDs. All defendants have been served a copy of the present application on their publicly available contact details, i.e. Email IDs, in advance and proof of service along with supporting affidavit of Plaintiff's counsel is filed herewith. The investigator's affidavit and evidence supporting the application, filed as an additional document separately. The prayers sought in the Application are in terms with the interim order dated 26.11.2021 and 11.11.2022 and para no. 101 of the UTV Software Communications Ltd. & Ors. v. 1337x.to & Ors. CS(COMM) 724/2017, judgment.

IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. \_\_\_\_\_ OF 2023

IN

CS(COMM) NO. 605 OF 2021

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Dramacool.news & Ors. ...Defendants

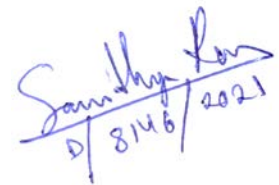
NOTICE OF MOTION

Sir,

The enclosed Application in the aforesaid matter is being filed on behalf of the Plaintiffs and is likely to be listed on 24 February 2023 or any date thereafter. Please take note accordingly.

Place: New Delhi

Date: 22<sup>nd</sup> February 2023



Anjali Agrawal | Sanidhya Rao  
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates  
Advocates for the Plaintiffs

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IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. \_\_\_\_\_ OF 2023

IN

CS(COMM) NO. 605 OF 2021

To,

The Deputy Registrar,

High Court of Delhi,

New Delhi

IN THE MATTER OF

Universal City Studios LLC and Ors.

...Plaintiffs

Versus

Dramacool.news & Ors.

...Defendants

Sir,

Will you kindly treat the accompanying application as an urgent one in accordance with the High Court Rules and Orders and list the present application before the Ld. Joint Registrar as per judgement dated 10.04.2019 passed by this Hon'ble Court in CS(COMM) 724/ 2017, UTV Software Communications Ltd. & Ors. v. 1337x.to & Ors. The relevant portion of the said judgement has been extracted herein below:

*“101. Consequently, along with the Order I Rule 10 application for impleadment, the plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website with sufficient supporting evidence. On being satisfied that the impugned website is indeed a mirror/redirect/alphanumeric website of injuncted Rogue Website(s) and merely provides new means of accessing the same primary infringing website, the Joint Registrar shall issue directions to ISPs to disable access in India to such mirror/redirect/alphanumeric websites in terms of the orders passed.”.*

The grounds of urgency:

*As prayed.*

Yours faithfully,

Place: New Delhi

Date: 22<sup>nd</sup> February 2023



*Sanidhya Rao*  
D/ 8146/2021

Anjali Agrawal | Sanidhya Rao  
(D/2045/2020) | (D/8146/2021)

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IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)

I.A. NO. \_\_\_\_\_ OF 2023

IN

CS(COMM) NO. 605 OF 2021

IN THE MATTER OF

Universal City Studios LLC and Ors. ...Plaintiffs

Versus

Dramacool.news & Ors. ...Defendants

APPLICATION ON BEHALF OF THE PLAINTIFFS UNDER  
ORDER I RULE 10 OF THE CODE OF CIVIL PROCEDURE,  
1908 SEEKING IMPLEADMENT OF ADDITIONAL MIRRORS,  
REDIRECTS, OR ALPHANUMERIC VARIATIONS AS  
DEFENDANTS IN THE MEMO OF PARTIES

MOST RESPECTFULLY SHEWETH:

1. Plaintiffs had filed the instant suit seeking permanent injunction against infringement of its copyright in its films being works of visual recording and which include sound recordings accompanying such visual recordings, unfair competition and commercial misappropriation of its exclusive rights enumerated under Section 14(d) of the Copyright Act, 1957. The Plaintiffs crave leave to refer to and rely upon the plaint which may be read as a part and

parcel of this application, the contents of which are not being repeated for the sake of brevity.

2. The present application has been filed seeking impleadment of additional mirror/redirect/alphanumeric variations under Order I Rule 10 of Code of Civil Procedure, 1908 as these variations merely provide access to the same websites which are the subject of the main injunction, namely, the following domains, which are also listed in Schedule A with their URLs and IP addresses:

55. *hurawatch.pro*

56. *movies2watch.cc*

57. *movies2watch.is*

58. *movies2watch.ru*

59. *himovies.top*

60. *hurawatch.at*

61. *hurawatch.cc*

62. *primewire.today*

63. *primewire.id*

64. *tamilgun.news*

65. *tamilgun.bio*

66. *tamilgun.org*

67. *tamilguns.vip*

68. *tamilguns.org*

(hereinafter referred to as ‘Proposed Defendant Websites’) as Defendant Nos. 55 - 68. The additional mirrors/redirects/alphanumeric variations, who the Plaintiffs are proposing to implead in the present suit are engaged in the business of hosting, streaming, retransmitting, making available for viewing and download, providing access to,

and communicating to the public, third party content and information through the medium of internet and mobile transmission the Plaintiffs' films without authorization leading to a direction/redirection of viewers from the Plaintiffs' legal/subscription based channels to internet based viewing through such illegal means.

3. It is submitted that "Ashok Kumars" (Defendant No. 37) or "John Doe" was also impleaded as party to the suit and leave of this Hon'ble Court was duly sought by the Plaintiffs to amend the memo of parties and substitute all such Ashok Kumar with specific websites which were found violating the Plaintiffs' exclusive rights. In this regard, reliance is placed upon paragraph 48 of the Plaint.
4. It is submitted that *vide* Order dated 26.11.2021, this Hon'ble Court was pleased to pass an *ex-parte* ad interim Order against the said Defendant Websites and directed the ISPs to block access to the Defendant Websites. For the sake of convenience, the relevant portion of the Order is extracted herein below:

*8. In view of above, the plaintiff has made out a prima facie case and in case the defendants are not restrained ex parte, the plaintiffs shall suffer irreparable loss and injury.*

*9. Accordingly, till the next date of hearing, the defendants are restrained in terms of prayers No.5(i) to 5(iii) of the injunction application...*

Copy of the Order dated 26.11.2021 is attached herewith.

For the sake of convenience paras 5(i),(ii) and (iii) have been reiterated hereinbelow:

*i. Pass an order of temporary injunction restraining the Defendant Nos. 1-25 (and such other mirror/redirect/ alphanumeric websites discovered to provide additional means of accessing the Defendant Websites, and other domains/ domain owners/web site operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights), its owners, partners, proprietors, officers, servants, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, from, in any manner hosting, streaming, reproducing, distributing, making available to the public and/or communicating to the public, or facilitating the same, on their websites, through the internet in any manner whatsoever, any cinematograph work/content/programme/ show in relation to which Plaintiffs have copyright;*

*ii. Pass an order directing the Defendant Nos.26 - 34 , their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, to block access to the Defendant Nos. 1-25 websites identified by the Plaintiffs in the instant suit (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Website, and other domains/domain owners/web site operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights);*

*iii. Pass an order directing the Defendant Nos.35 and 36, to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the Defendant Nos.1-25 websites identified by the Plaintiffs in the instant suit (and such other mirror/redirect/alphanumeric websites discovered to provide additional means of accessing the Defendant Websites, and other domains/domain owners/web site operators/entities which are discovered to have been engaging in infringing the Plaintiffs' exclusive rights).*



5. It is submitted the *vide* Order dated 21.03.2022 and 14.12.2022, this Hon'ble Court was pleased to pass an Order impleading Defendant Nos. 38-46 and 47-54, respectively, in accordance with order dated 26.11.2022. Further, the Plaintiffs are now seeking to implead the present Defendants as Proposed Defendant Nos. 55-68.
  
6. Plaintiffs had instituted 8 suits for Copyright Infringement against 30 infringing domains that were communicating to the public, Plaintiffs' copyright works without their authorization. The said suits were filed before the Hon'ble High Court of Delhi, being CS(COMM) 724 of 2017 UTV Software Communication Ltd. & Anr. v. 1337x.to and Ors., etc. Plaintiffs obtained a permanent injunction against the Defendant Websites therein, *vide* Judgement dated 10.04.2019. It is submitted that, this Hon'ble Court was pleased to record that the Defendant Websites are Hydra Headed Rogue websites who on being blocked, actually multiply and resurface as redirect or mirror or alphanumeric websites. Further, this Hon'ble Court held that such hydra-headed websites can be blocked by filing an impleadment application under Order I Rule 10 along with the evidence against them. The relevant portion of the Judgement is reiterated herein below:

94. *Now, the question that arises for consideration is how should courts deal with 'hydra headed' websites who on being blocked, actually multiply and resurface as alphanumeric or*

mirror websites. In the present batch of matters though this Court had injuncted the main website by way of the initial injunction order, yet the mirror/alphanumeric/redirect websites had been created subsequently to circumvent the injunction orders.

95. It is pertinent to mention that in Greek mythology the Hydra also called Lernaean Hydra is a serpent-like monster. The Hydra is a nine-headed serpent like snake. It was said that if you cut off one hydra head, two more would grow back.
96. Critics claim that website blocking is an exercise in futility as website operators shift sites—the so-called “whack-a-mole” effect.
97. Internationally, there has been some recent development to deal with the aforesaid menace in the form of a "Dynamic Injunction" though limited to mirror websites.
98. The High Court of Singapore in the case of *Disney Enterprise v. Ml Ltd.*, (2018) SGHC 206 has after discussing the cases of *20<sup>th</sup> Century Fox v. British Telecommunications PLC*, (2012) 1 All ER 869 and *Cartier International AG v. British Sky Broadcasting* (supra), held that the applicant was not obligated to return to court for an order with respect to every single IP address of the infringing URLs already determined by the Court. The Court held as under:-

"38 I found that the court has the jurisdiction to issue a dynamic injunction given that such an injunction constitutes "reasonable steps to disable access to the flagrantly infringing online location". This is because the dynamic injunction does not require the defendants to block additional FIOs which have not been included in the main injunction. It only requires the defendants to block additional domain names, URLs and/or IP addresses that provide access to the same websites which are the subject of the main injunction and which I have found constitute FIOs (see [19] - [29] above). Therefore, the dynamic injunction merely blocks new means of accessing the same infringing websites, rather than blocking new infringing websites that have not been included in the main injunction.

39. In fact, under the dynamic injunction applied for in the present case, the plaintiffs would be required to show in its affidavit that the new FQDNs provide access to the same FIOs which are the subject of

*the main injunction before the defendants would be required to block the new FQDNs (see [6] above) ...*

*xxx xxx xxx*

*42. In relation to S 193DB(3)(d) of the Copyright Act, i.e, the effectiveness of the proposed order, the dynamic injunction was necessary to ensure that the main injunction operated effectively to reduce further harm to the plaintiffs. This is due to the ease and speed at which circumventive measures may be taken by owners and operators of FIOs to evade the main injunction, through for instance changing the primary domain name of the FIO. Without a continuing obligation to block additional domain names, URLs and/or IP addresses upon being informed of such sites, it is unlikely that there would be effective disabling of access to the 53 FIOs."*

*(emphasis supplied)*

99. *Though the dynamic injunction was issued by the Singapore High Court under the provisions of Section 193 DDA of the Singapore Copyright Act, and no similar procedure exists in India, yet in order to meet the ends of justice and to address the menace of piracy, this Court in exercise of its inherent power under Section 151 CPC permits the plaintiffs to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC as these websites merely provide access to the same websites which are the subject of the main injunction.*
100. *It is desirable that the Court is freed from constantly monitoring and adjudicating the issue of mirror/redirect/alphanumeric websites and also that the plaintiffs are not burdened with filing fresh suits. However, it is not disputed that given the wide ramifications of site-wide blocking orders, there has to be judicial scrutiny of such directions and that ISPs ought not to be tasked with the role of arbiters, contrary to their strictly passive and neutral role as intermediaries.*
101. *Consequently, along with the Order I Rule 10 application for impleadment, the plaintiffs shall file an affidavit confirming that the newly impleaded website is a mirror/redirect/alphanumeric website with sufficient supporting evidence. On being satisfied that the impugned website is indeed a mirror/redirect/alphanumeric website of injuncted Rogue Website(s) and merely provides new means of accessing the same primary infringing website, the Joint Registrar shall issue directions to ISPs to disable access in*

*India to such mirror/redirect/alphanumeric websites in terms of the orders passed.*

Copy of the judgement dated 10.04.2019 is attached herewith.

7. It is submitted that the Proposed Defendant Websites are hydra headed websites and are making available and communicating without permission and authorization Plaintiffs' Copyrighted material in which Plaintiffs have an exclusive right. It is submitted that since these websites are showing Plaintiffs' content without authorization, the Proposed Defendant Websites fall squarely within the scope of the Judgement dated 10.04.2019 passed and the Plaintiffs are entitled to seek their impleadment and extension of the injunction Order.

8. Plaintiffs obtained a permanent injunction against the Defendant Websites *vide* Order dated 11.11.2022. The relevant portion of the Order is reproduced hereinbelow:

*6. In the meantime, considering that the injunction order in the suit has been operating since 26th November, 2021, the interim injunction granted vide the said order is confirmed during the pendency of the suit.*

*7. Accordingly, I.A. 15473/2021 is disposed of.*

9. In light of the above, it is imperative to implead the Proposed Defendant Websites. This Hon'ble Court ought to

extend the permanent injunction against the Proposed Defendant Websites. Further the evidence produced by the Plaintiffs, establishes that the Proposed Defendant Websites are merely providing a new means of accessing the same primary infringing websites that have been enjoined. Therefore, the said Proposed Defendant Websites ought to be blocked, and that this Hon'ble Court ought to issue directions to the ISPs to disable access in India to the Proposed Defendant Websites. Further, this Hon'ble Court in its Judgment dated 10.04.2019 has settled the law on impleadment of such mirror/redirect/alphanumeric Websites. The relevant portions of the judgement are extracted hereinbelow:

*107. Keeping in view the aforesaid finding ... the plaintiffs are permitted to implead the mirror/redirect/alphanumeric websites under Order I Rule 10 CPC in the event they merely provide new means of accessing the same primary infringing websites that have been enjoined...*

10. It is submitted that the Plaintiffs have, through its counsels, served Legal Notice to the Proposed Defendant Websites, calling upon them to cease and desist from indulging in such infringing activities. However, till date, the Proposed Defendant Websites have failed to stop their infringing activities.

11. Thus, in light of the above, it is imperative that the Proposed Defendant Websites are impleaded in the instant suit as Defendants to safeguard the interest of the Plaintiffs.

PRAYER:

12. In view of the above, Plaintiffs humbly pray that this Hon'ble Court may be pleased to:
  - a. Implead the Proposed Defendant Websites whose domains, subdomains and subdirectories are listed above and whose domains, URLs and IP addresses are listed in the attached Schedule A, as *Defendant No.55-68*, to the instant suit and extend the permanent injunction dated 11.11.2022
  - b. Pass an order directing the Defendants No. 26 to 34, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under it, to block access to the Proposed Defendant Websites listed in Schedule A;
  - c. Pass an Order directing the Defendant Nos. 35 and 36, to issue a notification calling upon the various internet and telecom service providers registered under it to block

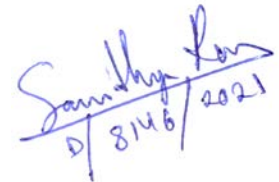
access to the Proposed Defendant Websites listed in Schedule A;

- d. Take the amended Memo of Parties on record; and
- e. Pass any further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the present case be passed.

It is prayed accordingly.

Place: New Delhi

Date: 22<sup>nd</sup> February 2023



Anjali Agrawal | Sanidhya Rao  
(D/2045/2020) | (D/8146/2021)

Saikrishna & Associates  
Advocates for the Plaintiffs

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