

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-13/2022-DS-II

Dated:02-08-2022

To,

All Internet Service Licensees'

**Subject: CS Comm 214 of 2022, Star India Pvt. Ltd. & Anr. V/s Ashar Nisar & Ors. Before Hon'ble Delhi High Court**

In continuation to Department of Telecommunications even no. letter dated 12.04.2022, 21.04.2022, 26.04.2022, 28.04.2022, 02.05.2022, 04.05.2022, 13.05.2022, 18.05.2022, 20.05.2022, 26.05.2022, 27.05.2022, 03.06.2022, 21.06.2022, 01.07.2022 & 21.07.2022; kindly find the enclosed Hon'ble Delhi High Court order dated 06<sup>th</sup> April, 2022 in the subject matter court case C.S. (Comm) No. 214 of 2022 along with **Thirty-Fourth (2 URLs)** list of additional websites/URLs, as provided by advocate for the plaintiff in the case with affidavit, for compliance. DoT is defendant No. 32 in the case.

2. Hon'ble Court in order dated 06<sup>th</sup> April, 2022 has, inter alia, directed that:

m. *Defendants No. 23 to 31, 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, are directed to block access to the various UI domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other UI domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights; and*

n. *Defendants No. 32 and 33 are directed to issue a Notification calling upon the various internet and telecom service providers registered under it to block access to the various domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights.*

3. Accordingly, in view of the above, all the Internet Service licensees are hereby notified to take immediate necessary action for compliance of the court order dated 06<sup>th</sup> April, 2022 with respect to **Thirty-Fourth (2 URLs)** list of additional websites/URLs at the earliest.

**Director(DS-II)**  
**Tel: 011-23036860**  
**Email:dirids2-dot@nic.in**

Encl: A/A

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

+ CS(COMM) 214/2022

STAR INDIA PVT. LTD. & ANR.

..... Plaintiffs

Through: Mr. Saikrishna Rajagopal, Mr. Yatinder Garg, Ms. Shehima Jauhari, Mr. Angad Singh Makkar and Ms. Sneha Jain, Advocates

versus

ASHAR NISAR & ORS.

..... Defendants

Through: Mr. Mohammad Kamran and Mr. Brijesh Ujjainwal, Advocates for D-13

**CORAM:**

**HON'BLE MS. JUSTICE JYOTI SINGH**

**ORDER**

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**06.04.2022**

**IA No.5336/2022 (exemption)**

1. Allowed subject to all just exceptions.
2. Application stands disposed of.

**IA No.5337/2022 (u/O. XI Rule 1(4) of the Commercial Courts, Commercial Division and Commercial Appellate Division of High Courts Act, 2015 r/w S. 151 CPC seeking leave to file additional documents)**

3. Present application has been preferred on behalf of the Plaintiffs seeking leave to file additional documents under Order 11 Rule 1(4) CPC.
4. Plaintiffs, if they wish to file additional documents at a later stage, shall do so strictly as per the provisions of the Commercial Courts Act, 2015.

5. Application is allowed and disposed of.

**I.A. 5335/2022 (under Section 80 read with Section 151 CPC)**

6. Since there is an urgency in the matter and the matter is being heard today, Plaintiffs are exempted from serving Defendants No.24, 27, 32 and 33 with advance notice.

7. For the reasons stated in the application, the same is allowed and disposed of.

**CS(COMM) 214/2022**

8. Let the plaint be registered as a suit.

9. Issue summons.

10. Mr. Mohammad Kamran, learned counsel enters appearance on behalf of Defendant No.13.

11. Written statement be filed by Defendant No.13 within 30 days from today alongwith affidavit of admission/denial of the documents of the Plaintiffs.

12. Replication thereto, be filed by the Plaintiffs within 15 days of the receipt of the written statement alongwith an affidavit of admission/denial of the documents filed by Defendant No.13.

13. Upon filing of process fee, issue summons to the remaining Defendants, through all permissible modes, returnable on 13.07.2022. Summons shall state that the written statement shall be filed by the Defendants within 30 days from the receipt of summons. Along with the written statement, Defendants shall also file affidavits of admission/denial of the documents of the Plaintiffs.

14. Replication be filed by the Plaintiffs within 15 days of receipt of the written statement. Along with the replication, an affidavit shall be filed by

the Plaintiffs of admission/denial of the documents filed by the Defendants.

15. If any of the parties wish to seek inspection of any documents, the same shall be sought and given within the timelines.

16. List before the Joint Registrar on 13.07.2022.

17. List before the Court on 25.08.2022.

**I.A. 5334/2022 (U/O 39 Rules 1 and 2 read with Section 151 CPC)**

18. Issue notice to the Defendants.

19. Mr. Mohammad Kamran, learned counsel accepts notice on behalf of Defendant No.13.

20. On steps being taken, notice be issued to the remaining Defendants, through all permissible modes, returnable on 25.08.2022.

21. It is averred in the plaint that Plaintiff No. 1 is a leading entertainment and media company in India engaged, *inter alia*, in the production of popular content broadcast on its STAR Channels (such as Star Plus, Star Sports 1, Star Gold, Star Jalsa, etc.) and is an exclusive licensee of media rights to various sporting events which are also broadcast on its Star channels such as the ongoing TATA Indian Premier League 2022. Plaintiff No.1 also claims to be a leading film production and distribution company. Plaintiff No. 2, it is averred, owns and operates the online audio-visual streaming platform and website, 'www.hotstar.com' and the mobile application, 'Disney+ Hotstar' which enables viewers to watch content such as serials (including content of STAR Channels) and programs, films, sports content including live sporting events, trailers of upcoming films and serials, international content through the medium of the internet.

22. Plaintiffs claim to have exclusive rights in the aforesaid works by

virtue of provisions of Section 14(d) of the Copyright Act, 1957, including *inter alia* the rights to publicly exhibit and communicate the said content through any medium or mode, including on STAR Channels or Disney+ Hotstar. It is pleaded that by virtue of the exclusive media rights granted to the Plaintiffs, they broadcast and communicate to the public, live, delayed, highlights, clips and/or repeat telecast of numerous sporting events *inter alia* the ongoing TATA Indian Premier League 2022 in India through Disney+ Hotstar and also through their STAR Channels. Plaintiffs claim to be the sole and exclusive owner of the Broadcast Reproduction Rights in relation to the aforesaid broadcasts of sporting events, communicated through the STAR Channels and Disney+ Hotstar, in accordance with Section 37 of the Copyright Act, 1957.

23. Learned counsel appearing on behalf of the Plaintiffs submits that it has come to the notice of the Plaintiffs that their exclusive rights in the aforementioned content, i.e. movies, general entertainment content (television shows, web-series, etc.) and sporting events *inter alia* the ongoing TATA Indian Premier League 2022, were and are continuing to be infringed by Defendants No.1-12 herein. It is specifically averred that Defendants No. 1-12 are infringing and/or facilitating/enabling/authorising infringement of the Plaintiffs' exclusive rights under Sections 14(d) and 37 of the Copyright Act, 1957, by reproducing, storing, transmitting, communicating, making available for viewing or providing access to the Plaintiffs' aforesaid contents/works.

24. It is further contended that Defendants No. 1-6 (hereinafter referred to as 'Rogue Apps') are third-party Android-based mobile applications that communicate, make available for viewing and provide access to content,

free of cost (or at minimal subscription) and without any authorisation from various right owners, including the aforesaid content of the Plaintiffs. It is also contended that the download, distribution and use of these Android-based mobile Apps, such as the Rogue Apps, occurs through a .APK(Android Package Kit) file format. These Rogue Apps are completely illegal apps and have no permission or authorization to reproduce, store, transmit, communicate or make available for viewing and provide access to any of the Plaintiffs' content. The intent and purpose of these Rogue Apps is clearly to exploit copyright-protected works of the Plaintiffs' content and to provide an alternative to legitimate sources to the user such that the user does not have to pay for enjoying the content.

25. It is averred in the plaint and argued by the learned counsel that Defendants No. 7 to 12 (hereinafter referred to as 'Rogue Websites') are third-party websites which serve as a repository of .APK files, that provide access to users of Android based mobile Apps such as the Rogue Apps. Differently put, the user who is looking for a specific Android based App that will provide access to infringing content, would typically be in a position to download such an App from the .APK file provided by the Rogue Websites. Hundreds of Android-based mobile Apps including most of the Rogue Apps are available for download on these Rogue Websites. It is further contended that the Rogue Websites, used to distribute numerous rogue Android-based mobile Apps, have been developed only to enable the download of the application file for such Apps, such as "RTS TV", "Stream India", etc. and are solely instruments/vehicles of infringement which are indulging in the illicit business of communicating/making available infringing content. Thus, according to the learned counsel, Plaintiffs have

reason to believe that the owners of the Rogue Websites, which are distributing the aforesaid Apps, are the owners of/affiliates of the owners of said Apps.

26. It is next contended that Defendants No. 1-12 continue to infringe the Plaintiffs' exclusive rights with respect to films, general entertainment content and sporting events, including but not limited to the TATA IPL 2022, which has commenced on 26.03.2022 and shall conclude on 29.05.2022.

27. It is brought out by the learned counsel that Defendants No. 13-22 are the domain name registrars of websites/UI domains of Defendants No.1-12, as captured in paragraph 81 of the Plaint and have been arrayed for the limited purpose of revoking/cancelling the domains of Defendants No. 1 to 12 as also to seek disclosure of the registrant details and billing details of these Rogue Websites/UI domains, so that the exact identity and location of the owner of these domains can be confirmed and discerned.

28. Learned counsel submits that Defendants No. 23-31 are Internet Service Providers which have been arrayed for the limited purpose of disabling access into India of the Rogue Websites/domains/UI along with the creators/developers of the Rogue Apps identified in the present suit or any other website/UI/App identified by the Plaintiffs on Affidavit. Defendants No. 32 and 33 are the Department of Telecommunications ('DOT') and Ministry of Electronics and Information Technology ('MEITY'), which are Government departments and have been arrayed for the limited purpose of issuing notifications calling upon the internet and telecom service providers to block access to the Rogue Apps and the Rogue Websites, identified in the present suit as also such other websites which are

subsequently discovered to be infringing the rights of the Plaintiffs. No formal relief has been sought against the Defendant No. 13-33.

29. It is further contended that Defendants No. 1-12 are anonymous entities/websites and the details of their owners are hidden or forged/inaccurate and that these entities/websites are vehicles of infringement that engage in flagrant violation of the intellectual property rights of the Plaintiffs. It is claimed that due to the nature of internet, which offers anonymity, these entities/websites systematically engage in violation of intellectual property rights of the Plaintiffs. Thus, the contention is that Defendants No. 1-12, i.e. Rogue Apps and Rogue Websites, are predominantly engaged in violating third party rights.

30. Having heard learned counsel for the Plaintiffs, this Court is of the view that Plaintiffs have made out a *prima facie* case for grant of *ex parte ad-interim* injunction. Balance of convenience lies in favour of the Plaintiffs and they are likely to suffer irreparable harm in case the injunction, as prayed for, is not granted.

31. Accordingly, the following directions are passed:

a. Defendants No. 1 to 6 (and such other Rogue Apps which are discovered during the course of the proceedings and notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their owners, partners, proprietors, officers, servants, affiliates, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, are restrained from in any manner communicating to the public, hosting, storing, reproducing, streaming, broadcasting, re-broadcasting, causing to be seen or heard by



public on payment of charge and/or making available for viewing, the Plaintiffs' Works/Content through their Rogue Apps (*viz*, Ninja TV, RTS TV, Kyte TV, Picaso TV, Stream India and Hotstar Mod App) or any other App, including ones whose names/branding/trademark recall is deceptively or substantially similar to the Rogue Apps identified hereinabove, amounting to infringement of the Plaintiffs' copyright and Broadcast Reproduction Rights, till the next date of hearing;

b. Defendants No. 7 to 12, on both 'http' and 'https' (and such other websites/entities which are discovered during the course of the proceedings and notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their 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, are restrained from in any manner infringing and/or authorising the infringement by *inter alia* facilitating and materially contributing to the communicating, hosting, streaming and/or making available for viewing and downloading, without authorization, on their websites or other platforms, through the internet in any manner whatsoever, the Plaintiffs' content, so as to infringe the Plaintiffs' exclusive rights, copyrights and Broadcast Reproduction Rights, till the next date of hearing;

c. Defendant No. 13, its directors, partners, proprietors, officers, affiliates, servants, employees and all others in the capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, are directed to de-activate/suspend the domain name registration of Defendant No. 3 (kyte-tv.com), Defendant No. 4 (picasotv.com), Defendant

No. 9 (apkmoles.com) and Defendant No. 11 (downloadapks.net);

d. Defendant No. 14, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 2 (rtstvapk.xyz and rtstv-app.com);

e. Defendant No. 15, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 1 (ninjatv.app), Defendant No. 2 (xtsaiful.xyz), Defendant No. 5 (globalnewsgeeks.xyz), Defendant No. 7 (apkdevil.com) and Defendant No. 10 (apkpot.com);

f. Defendant No. 16, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 12 (techbigs.com);

g. Defendant No. 17, its 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, are directed to de-activate / suspend the domain name registration of the Defendant No. 8 (apkfileok.com);

h. Defendant No. 18, its 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,

are directed to de-activate/suspend the domain name registration of the Defendant No. 5 (www-streamindianew.xyz);

i. Defendant No. 19, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 4 (jfskkfsjfsksdey.najfilmy.eu and adhkjgfyufsf.najfilmy.eu);

j. Defendant No. 20, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 1 (powerex.pk and ninjatv.pk);

k. Defendant No. 21, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 3 (api-kytetv.lalalalalori.workers.dev);

l. Defendant No. 22, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 3 (kytetv.site);

m. Defendants No. 23 to 31, 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, are directed to block access to the various UI domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other UI domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights; and

n. Defendants No. 32 and 33 are directed to issue a Notification calling upon the various internet and telecom service providers registered under it to block access to the various domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights.

32. Order be given *dasti* to learned counsel for the Plaintiffs.

33. Provisions of Order 39 Rule 3 CPC shall be complied with by the Plaintiffs, within a period of two weeks from today.

**JYOTI SINGH, J**

**APRIL 06, 2022/yg**



**LIST OF DOMAINS / URLs / IP ADDRESSES**

<b>S. NO.</b>	<b>UI DOMAINS / WEBSITES OF EARTH IPTV APP</b>
1.	line.crystalott.net
2.	earthiptv.club

IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)  
CS (COMM) NO. 214 OF 2022

IN THE MATTER OF

Star India Pvt. Ltd. & Anr.

...Plaintiffs

*Versus*

Ashar Nisar & Ors.

...Defendants

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Yatinder Garg / Snehima Jauhari / Angad S. Makkar  
(D/1330/2015) / (D/2733/2017) / (D/3579/2021)

Place: New Delhi  
Date: 26<sup>th</sup> July 2022

Saikrishna and Associates  
Advocates for the Plaintiffs

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New Delhi - 110003

+91 9999064036

yatinder@saikrishnaassociates.com

IN THE HIGH COURT OF DELHI AT NEW DELHI  
(ORDINARY ORIGINAL COMMERCIAL JURISDICTION)  
CS (COMM) NO. 214 OF 2022

IN THE MATTER OF

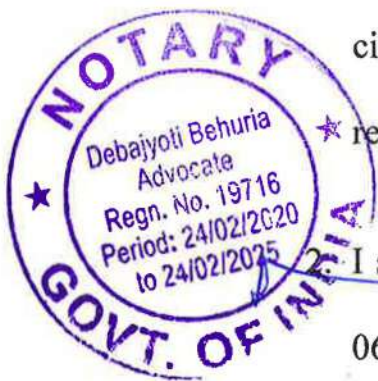
Star India Pvt. Ltd. & Anr. ...Plaintiffs  
*Versus*

Ashar Nisar & Ors. ...Defendants

AFFIDAVIT OF MR. ABHISHEK PRAHARAJ, S/O MR. KISHORE PRAHARAJ, AGED ABOUT 28 YEARS, AUTHORIZED SIGNATORY OF PLAINTIFFS, HAVING ITS OFFICE AT STAR HOUSE, URMI ESTATE, 95 GANPATRAO KADAM MARG, LOWER PAREL (W), MUMBAI, 400013, PRESENTLY AT NEW DELHI

I, the above-named deponent, do hereby solemnly affirm and declare as under:

1. That, I am the Authorized Representative of the Plaintiffs in the present suit and as such I am conversant with the facts and circumstances of the present suit and competent to depose in respect thereof.



I state that I am aware of the present suit and the order dated 06.04.2022 whereby the Hon'ble Court was pleased to pass an *ex-parte ad-interim* order in terms of the following:

*"31. Accordingly, the following directions are passed:  
a. Defendants No. 1 to 6 (and such other Rogue Apps which are discovered during the course of the proceedings and*



*notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their owners, partners, proprietors, officers, servants, affiliates, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, are restrained from in any manner communicating to the public, hosting, storing, reproducing, streaming, broadcasting, re-broadcasting, causing to be seen or heard by public on payment of charge and/or making available for viewing, the Plaintiffs' Works/Content through their Rogue Apps (viz, Ninja TV, RTS TV, Kyte TV, Picaso TV, Stream India and Hotstar Mod App) or any other App, including ones whose names/branding/trademark recall is deceptively or substantially similar to the Rogue Apps identified hereinabove, amounting to infringement of the Plaintiffs' copyright and Broadcast Reproduction Rights, till the next date of hearing;*



*b. Defendants No. 7 to 12, on both 'http' and 'https' (and such other websites/entities which are discovered during the course of the proceedings and notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their 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, are restrained from in any manner infringing and/or authorising the infringement by inter alia facilitating and materially*



*contributing to the communicating, hosting, streaming and/or making available for viewing and downloading, without authorization, on their websites or other platforms, through the internet in any manner whatsoever, the Plaintiffs' content, so as to infringe the Plaintiffs' exclusive rights, copyrights and Broadcast Reproduction Rights, till the next date of hearing;*

*c. Defendant No. 13, its directors, partners, proprietors, officers, affiliates, servants, employees and all others in the capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, are directed to de-activate/suspend the domain name registration of Defendant No. 3 (kyte-tv.com), Defendant No. 4 (picasotv.com), Defendant No. 9 (apkmoles.com) and Defendant No. 11 (downloadapks.net);*

*d. Defendant No. 14, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 2 (rtstvapk.xyz and rtstv-app.com);*

*e. Defendant No. 15, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 1 (ninjatv.app), Defendant No. 2 (xtsaiful.xyz), Defendant No. 5 (globalnewsgeeks.xyz), Defendant No. 7 (apkdevil.com) and Defendant No. 10 (apkpot.com);*



f. Defendant No. 16, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 12 (techbig.com);

g. Defendant No. 17, its 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, are directed to de-activate / suspend the domain name registration of the Defendant No. 8 (apkfileok.com);

h. Defendant No. 18, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 5 (www-streamindianew.xyz);

i. Defendant No. 19, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 4 (jfskkfsjfsksdey.najfilmy.eu and adhkjgfyufsf.najfilmy.eu);

j. Defendant No. 20, its 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, are directed to





*de-activate/suspend the domain name registration of the Defendant No. 1 (powerex.pk and ninjatv.pk);*

*k. Defendant No. 21, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 3 (api-kytetv.lalalalalori.workers.dev);*

*l. Defendant No. 22, its 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, are directed to de-activate/suspend the domain name registration of the Defendant No. 3 (kytetv.site);*

*m. Defendants No. 23 to 31, 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, are directed to block access to the various UI domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other UI domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights; and*

*n. Defendants No. 32 and 33 are directed to issue a Notification calling upon the various internet and telecom service providers registered under it to block access to the various domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other domains/websites that may subsequently be notified on*

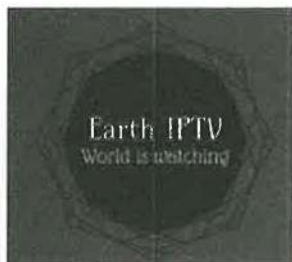


*Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights.”*

3. I state that in order to protect and enforce its exclusive rights in the Plaintiffs’ Content, including but not limited to the content made available through the Plaintiffs’ STAR television channels (such as Star Sports 1, Star Gold, Star Utsav, etc.) (“STAR Channels”), the Plaintiffs engaged the services of an investigation agency, Copyright Integrity International, to identify and monitor additional rogue Android-based mobile Apps (in terms of para 31(a) of the aforementioned order dated 06.04.2022) and additional Rogue Websites collaborating with the said Apps and/or the Rogue Apps identified in the instant suit (i.e., Defendant Nos. 1 to 6) and gather evidence of their infringing activity.



4. I state that the ‘Earth IPTV’ App, using the logo ‘



’, has been identified by the investigation agency as an Android-based mobile App which is engaged in illegally communicating the Plaintiffs’ Content, including but not limited to the content made available through the Plaintiffs’

STAR Channels. I state that the 'Earth IPTV' App is an Android application that unauthorizedly makes available for viewing and provides access content shown on TV Channels including movies, TV shows, live sporting events, web-series and other Video On Demand content including that of the Plaintiffs.

5. I state that the primary intent and purpose of the aforesaid 'Earth IPTV' App is to exploit various copyright-protected works, including but not limited to the Plaintiffs' Content, free of cost (or at minimal subscription) and without any authorisation from the right owners including the Plaintiffs. In fact, the very intent of the said App is to provide an alternative to legitimate sources to the user, such that a user does not have to pay for enjoying the copyright-protected works. Detailed allegations regarding the "rogue" nature of the aforesaid App are provided hereinafter. The rogue nature of the said App is also well known considering it is known in the industry that the said App is not available on well-renowned App Stores (like Google Play Store) ostensibly for the reason that the said App violates Google's general policies on intellectual property rights protection.





6. I state that the step-by-step process for downloading the APK file for the 'Earth IPTV' App and running the said mobile App on a computer has been detailed in the evidence filed herewith.

7. I state that it is visible from the evidence filed herewith that the said 'Earth IPTV' App is a Rogue App:

a. It is evident from the home page of the said App, 'Earth IPTV' App that the primary purpose of this App is to commit and facilitate copyright infringement, i.e., to transmit, stream, download, communicate, issue copies of, cause to be seen or heard by the public on payment of charges, make available to the public and provide access to copyright works of various right owners including that of the Plaintiffs, for free and without any authorisation. The home page of the 'Earth IPTV' App displays the said content available for illegal viewing and streaming free of cost.

b. 'Earth IPTV' App has been created as a vehicle of infringement whose whole business model is designed to provide members of the public access to copyright content without authorization. From the evidence on record, it is evident that the infringing content is made available on 'Earth IPTV' App's platform in a



systematic, organised, and intentional manner with regularity and consistency.

- c. The domain(s) through which 'Earth IPTV' App is being distributed and also the domains where the illegal content is being stored and hosted are all located at unverifiable locations and no contact details are available since the said details of the registrants are masked and no presence or traceable detail is available either of the creator / registrant.
- d. The 'Earth IPTV' App provides easy-to-use directories, indexes and categories to infringing content located on their servers for users to navigate and easily find the said content. The said App has indexed content under various categories, such as region (*viz* 'Asia', etc.), language (*viz* 'Hindi', etc.), genre (*viz* 'Sports', etc.).
- e. Disregard for copyright by the 'Earth IPTV' App is evident from the fact that the said App generally provides content of various right owners, including the Plaintiffs without any authorisation.



8. I state that the *ex parte ad interim* injunction granted *vide* order dated 06.04.2022 passed by this Hon'ble Court is applicable to the aforesaid Rogue App, *viz* 'Earth IPTV' App, identified by

the Plaintiffs' investigation agency (in terms of para 31(a) of the aforementioned order dated 06.04.2022). Accordingly, the relief granted in terms of paras 31(a) and (b) of the aforementioned order dated 06.04.2022 and the directions issued by the Hon'ble Court to Internet Service Providers (i.e., Defendant Nos. 23 to 31) and to the DoT and MEITY (i.e., Defendant Nos. 32 and 33) are applicable in relation to user interface (UI) domains / websites / URLs identified and notified by the Plaintiffs to be infringing and/or authorising infringement of the Plaintiffs' Content through the Rogue 'Earth IPTV' App.



9. In light of the above, I state that the following user interface (UI) domain / website has been identified by the investigation agency as engaged in illegally communicating the Plaintiffs' Content, including but not limited to the content made available through the Plaintiffs' STAR Channels, through the aforesaid Rogue App, viz 'Earth IPTV' App:

S. No.	Domains / Websites
1.	line.crystalott.net

10. I further state the following third-party website has been identified by the investigation agency as engaged in authorising infringement of the Plaintiffs' Content, including but not



including but not limited to the content made available through the Plaintiffs' STAR Channels through the rogue App, viz 'Earth IPTV' App, by exclusively making available for download and usage the said App:

S. No.	Domains / Websites
1.	earthiptv.club

11.I state that from the evidence filed along with the present Affidavit, it is evident that the above-mentioned domains / websites are hosting and/or streaming and/or providing access and/or making available for viewing the broadcast of Plaintiffs' Content, including but not limited to the content made available through the Plaintiffs' STAR Channels, through the aforesaid Rogue App, viz 'Earth IPTV' App, and/or authorising infringement of the Plaintiffs' Content by making available for download and usage the said App. I state that the Plaintiffs are the exclusive right holders for Plaintiffs' Content, including but not limited to the content made available through the Plaintiffs' STAR Channels, for the worldwide territory and the Plaintiffs have not authorised any of the above-mentioned websites to communicate and or make available for viewing the Plaintiffs' Content, including but not limited to the content made available through the Plaintiffs' STAR Channels.



12.I state that the Plaintiffs are not aware of the owner(s) of these 2 rogue UI domains / websites as either they are anonymous or have incorrect or incomplete addresses.

13.I state that in terms of the following directions passed by this Hon'ble Court, vide order dated 06.04.2022, *ex parte ad-interim* order dated 06.04.2022 (reproduced herein above) is also applicable on the above mentioned domains / websites.

*"31. Accordingly, the following directions are passed:*

*a. Defendants No. 1 to 6 (and such other Rogue Apps which are discovered during the course of the proceedings and notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their owners, partners, proprietors, officers, servants, affiliates, employees, and all others in capacity of principal or agent acting for and on their behalf, or anyone claiming through, by or under it, are restrained from in any manner communicating to the public, hosting, storing, reproducing, streaming, broadcasting, re-broadcasting, causing to be seen or heard by public on payment of charge and/or making available for viewing, the Plaintiffs' Works/Content through their Rogue Apps (viz, Ninja TV,*



*RTS TV, Kyte TV, Picaso TV, Stream India and Hotstar Mod App) or any other App, including ones whose names/branding/trademark recall is deceptively or substantially similar to the Rogue Apps identified hereinabove, amounting to infringement of the Plaintiffs' copyright and Broadcast Reproduction Rights, till the next date of hearing;*

*b. Defendants No. 7 to 12, on both 'http' and 'https' (and such other websites/entities which are discovered during the course of the proceedings and notified on Affidavit by the Plaintiffs to have been infringing/authorising the infringement of the Plaintiffs' exclusive rights, copyrights and broadcast reproduction rights), their 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, are restrained from in any manner infringing and/or authorising the infringement by inter alia facilitating and materially contributing to the communicating, hosting, streaming and/or making available for viewing and downloading, without authorization, on their websites or other platforms, through the internet in any manner whatsoever, the Plaintiffs' content, so as to infringe the Plaintiffs' exclusive*





*rights, copyrights and Broadcast Reproduction Rights, till the next date of hearing;*

*xxx*

*m. Defendants No. 23 to 31, 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, are directed to block access to the various UI domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other UI domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights;*

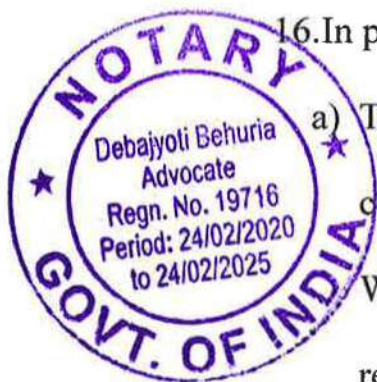


*and*  
*n. Defendants No. 32 and 33 are directed to issue a Notification calling upon the various internet and telecom service providers registered under it to block access to the various domains/websites identified by the Plaintiffs in the instant suit at S.No. 1 of the Documents or such other domains/websites that may subsequently be notified on Affidavit by the Plaintiffs to be infringing/authorising infringement of its exclusive rights."*

14.I state that the evidence filed along with the present affidavit was shared by the investigating agency in google drive link. I downloaded the same onto the computer (Intel (R) Core (TM) i5-2520M CPU @ G2010 @ 2.50 GHz 2.50 GHz) which is regularly used by me in the ordinary course of business and thereafter, shared the same with the Plaintiffs' Counsel.

15.I am advised to state that the conditions of Sections 65B of the Indian Evidence Act, 1872 and Order XI Rule 6(3) of the Commercial Courts, Commercial Division and Commercial Appellate Division of High Courts Act, 2015 are complied with in respect of these documents.

16.In particular, I confirm:-



a) That the said computer system is regularly used to produce computer outputs like emails and information from the World Wide Web (Internet) and store other electronic records. The relevant information from the websites and electronic records as mentioned above was downloaded by me in the course of activity of the Plaintiffs. I have a lawful control over the use of the said computer system by virtue of my capacity in the organization.

- b) That the electronic records mentioned above are downloaded from the computer system as part of the ordinary course of activities of the Plaintiffs.
- c) That the computer system as used by me has been operating properly and the electronic records and their accuracy and contents have not been altered and tampered with in any manner whatsoever.
- d) That the information contained on the computer outputs is an exact replica and has been produced from the original electronic record and therefore, reproduces the information contained on the electronic records therein.

*[Signature]*  
DEPONENT



*[Signature]*  
I identified the deponent who has signed in my presence.  
VERIFICATION

Verified at New Delhi on this the 27 day of JULY 2022 that the contents of the above said Affidavit are true to the best of knowledge, information and belief and nothing material has been concealed therefrom.

**CERTIFIED THAT THE DEPONENT**  
 Sri/Smt/Km.....  
 S/o, W/o, D/o.....  
 R/o.....  
 Identified by Shri/Smt.....  
 has solemnly affirmed before me at  
 New Delhi on 27 JUL 2022 SI. No. DEPONENT  
 That the contents of the affidavit which have been read & explained to him are true and correct to this knowledge.

*[Signature]*  
Notary Public

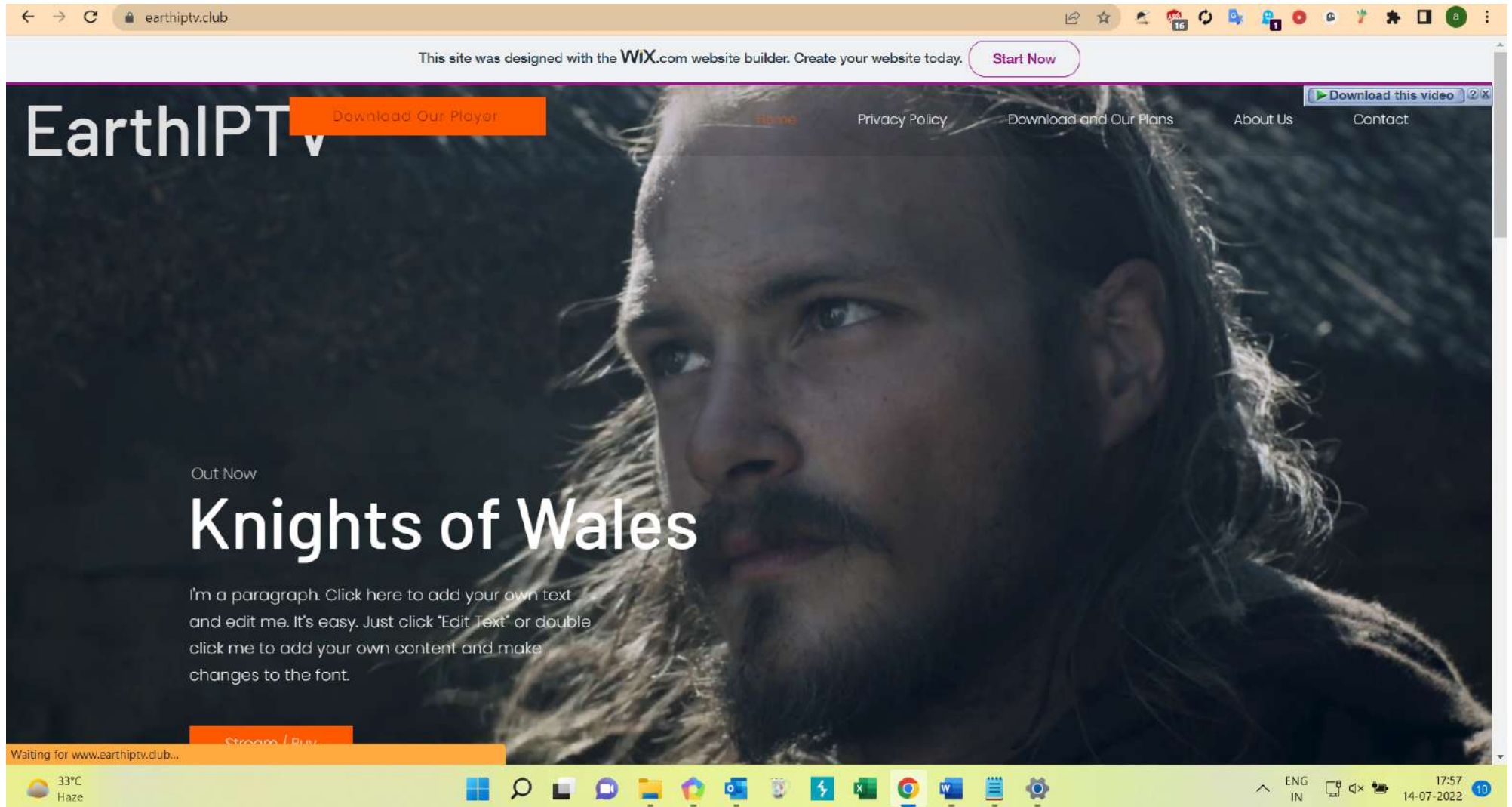
**ANNEXURE A: LIST OF DOMAINS / URLs / IP  
ADDRESSES**

S. NO.	UI DOMAINS / WEBSITES OF EARTH IPTV APP
1.	line.crystalott.net
2.	earthiptv.club



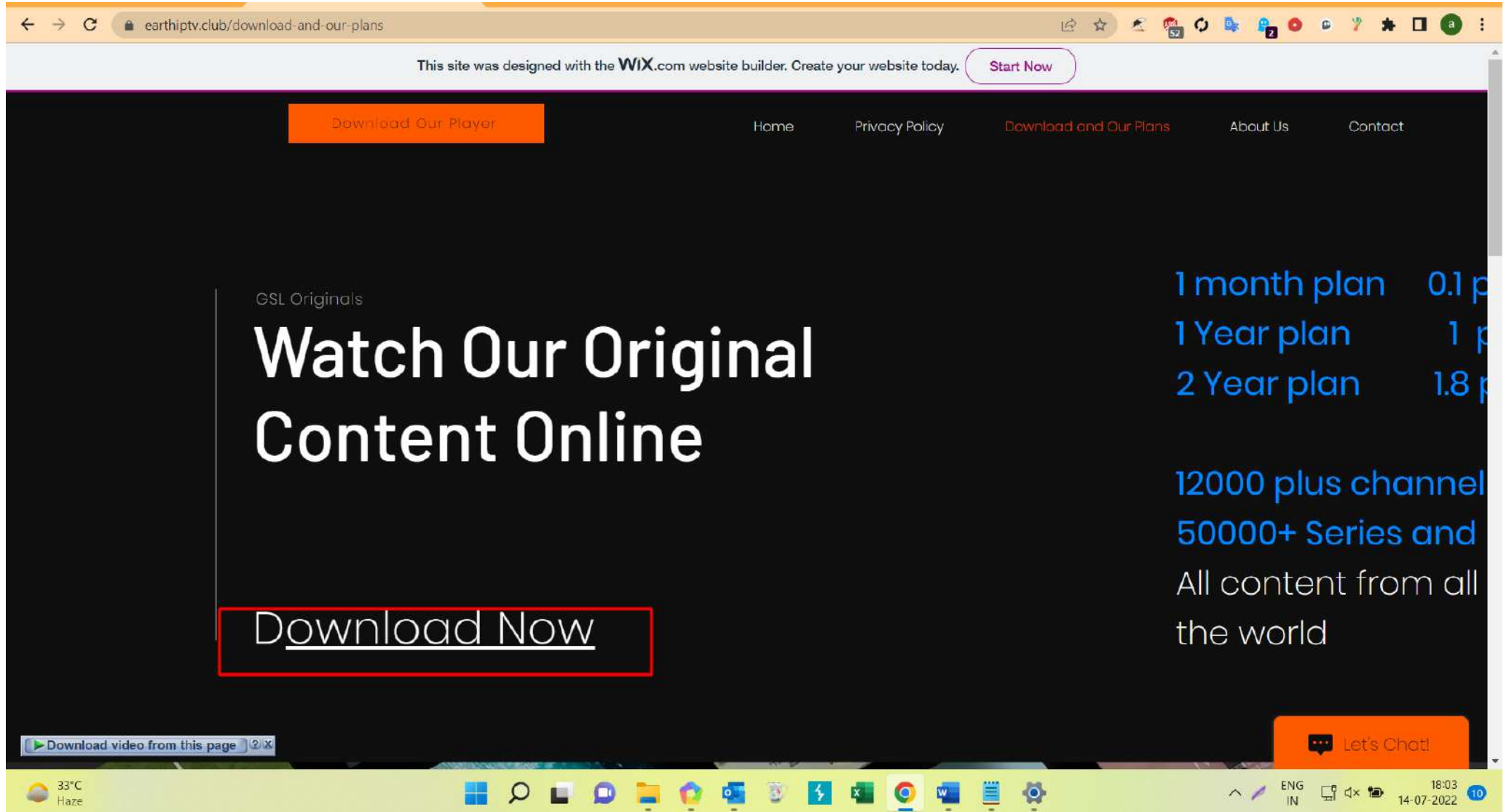
**Modus operandi for Investigation into the illegal and infringing activities of the rogue App, Earth IPTV:**

**Step 1:** The Investigator opened the website -‘earthiptv.club’ and clicked on the ‘download and Our Plans’ button to download the .apk file for the rogue App, Earth IPTV.

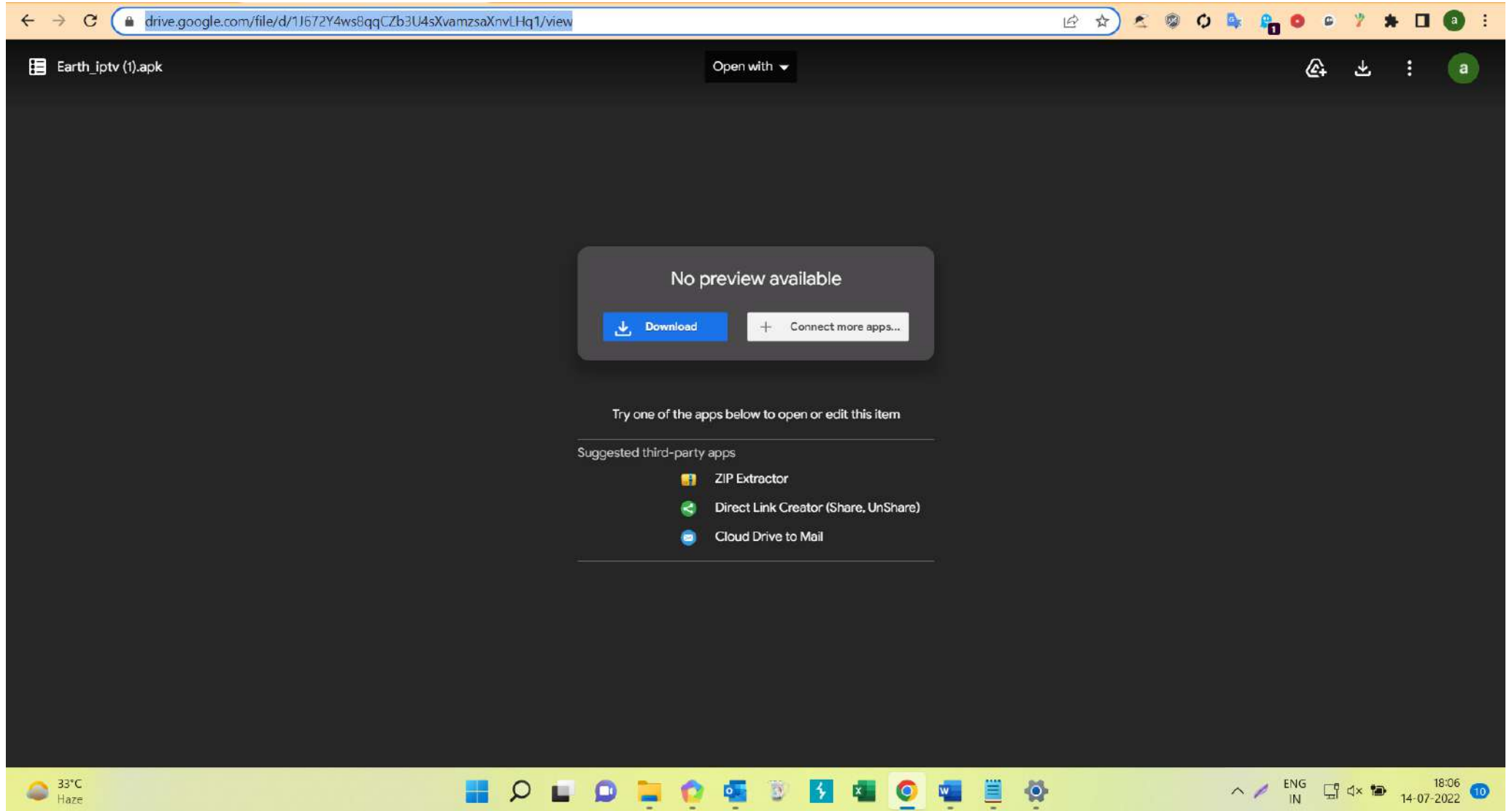




Step 2: The Investigator clicked on the 'download now' button and was redirected to a Google Drive link where the .apk file for the rogue App, Earth IPTV is hosted / stored.

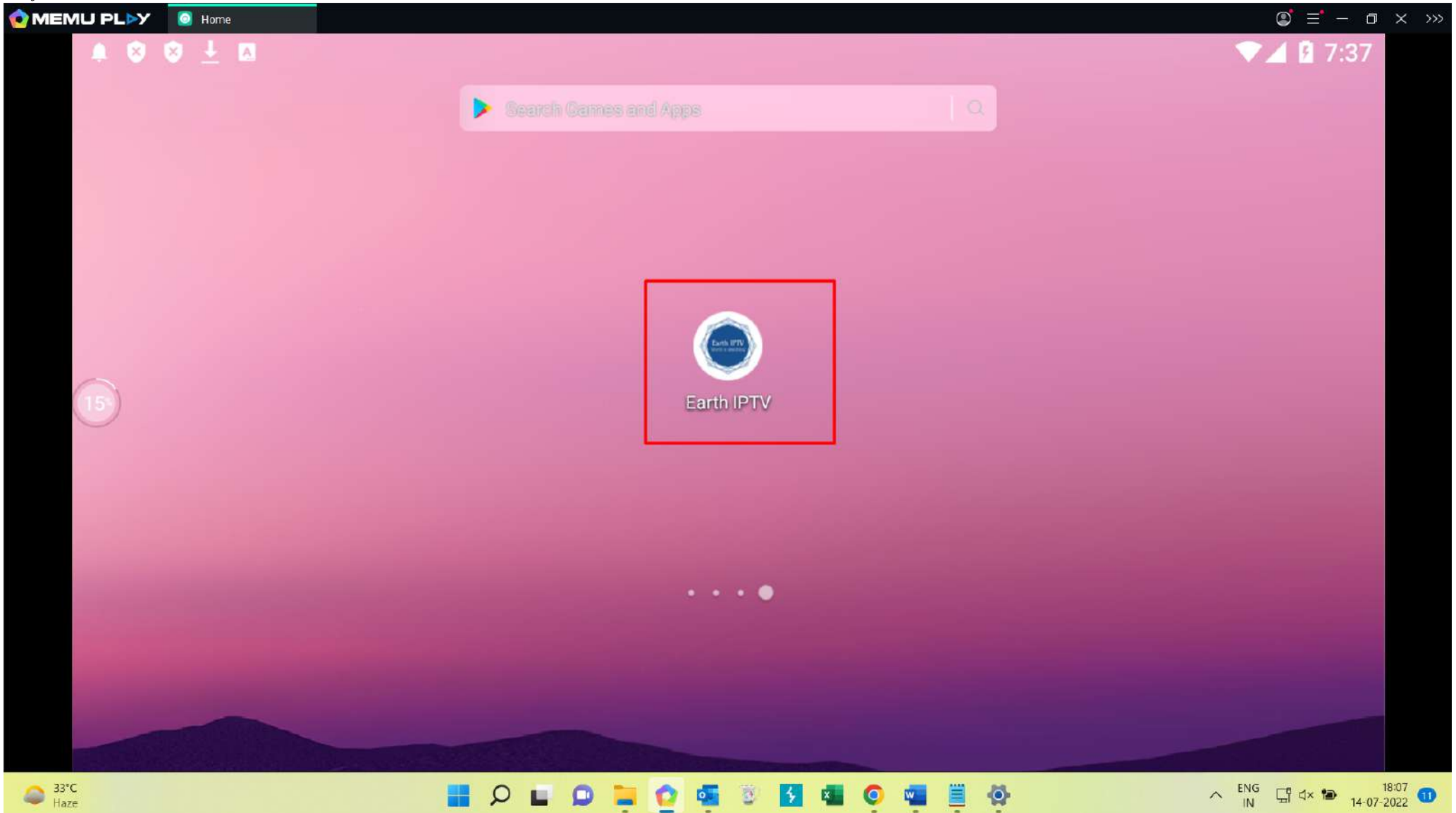


**Step 3:** URL for the aforesaid Google Drive storing / hosting the .apk file for the rogue App, Earth IPTV:  
<https://drive.google.com/file/d/1J672Y4ws8qqCZb3U4sXvamzsaXnvLHq1/view>



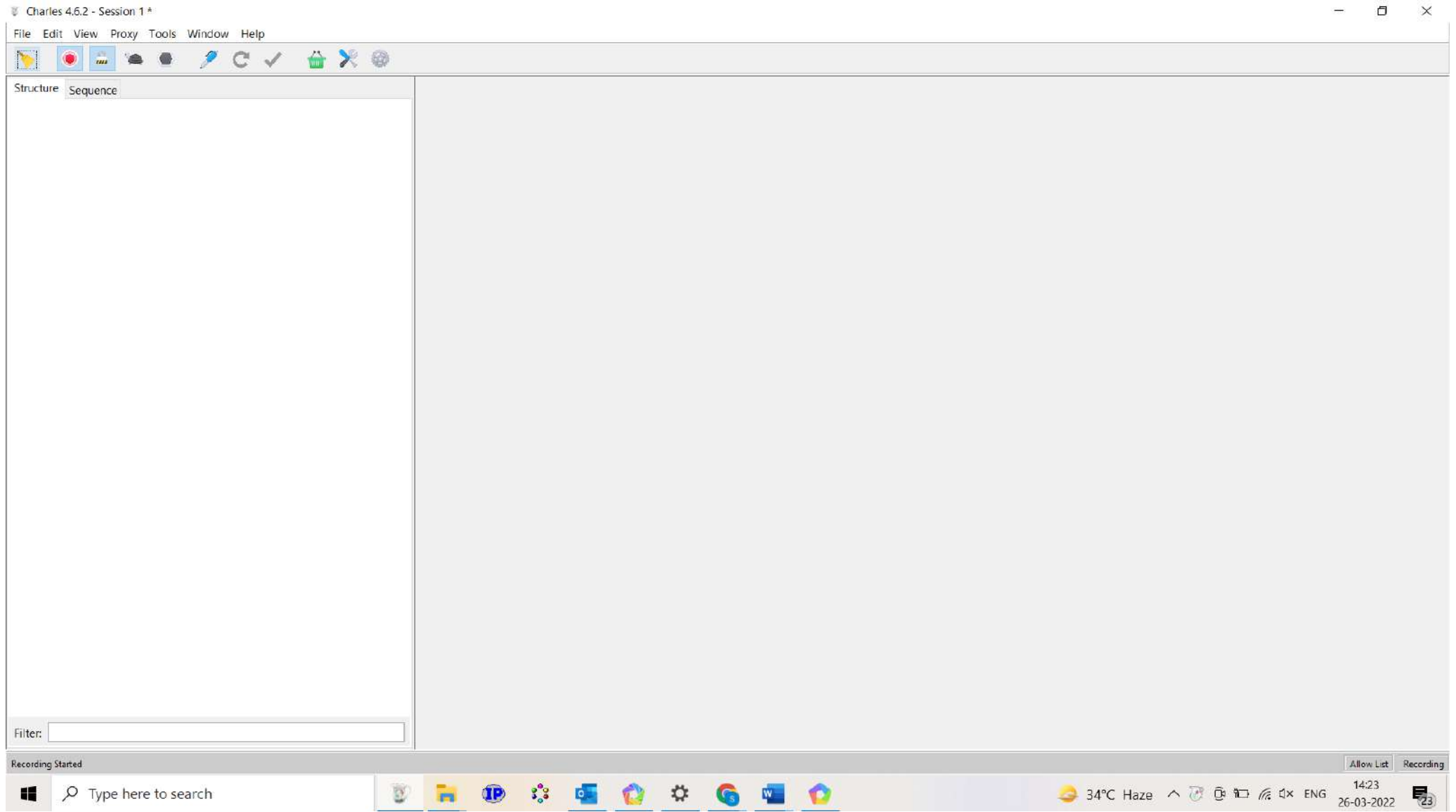
**Step 4:** The Investigator then installed the Earth IPTV .apk file on “Memu Play”.

*Note: The Memu Play application is designed to enable Android applications to run on PCs running Microsoft Windows and Apple's macOS. This application's basic features are free to download and use.*

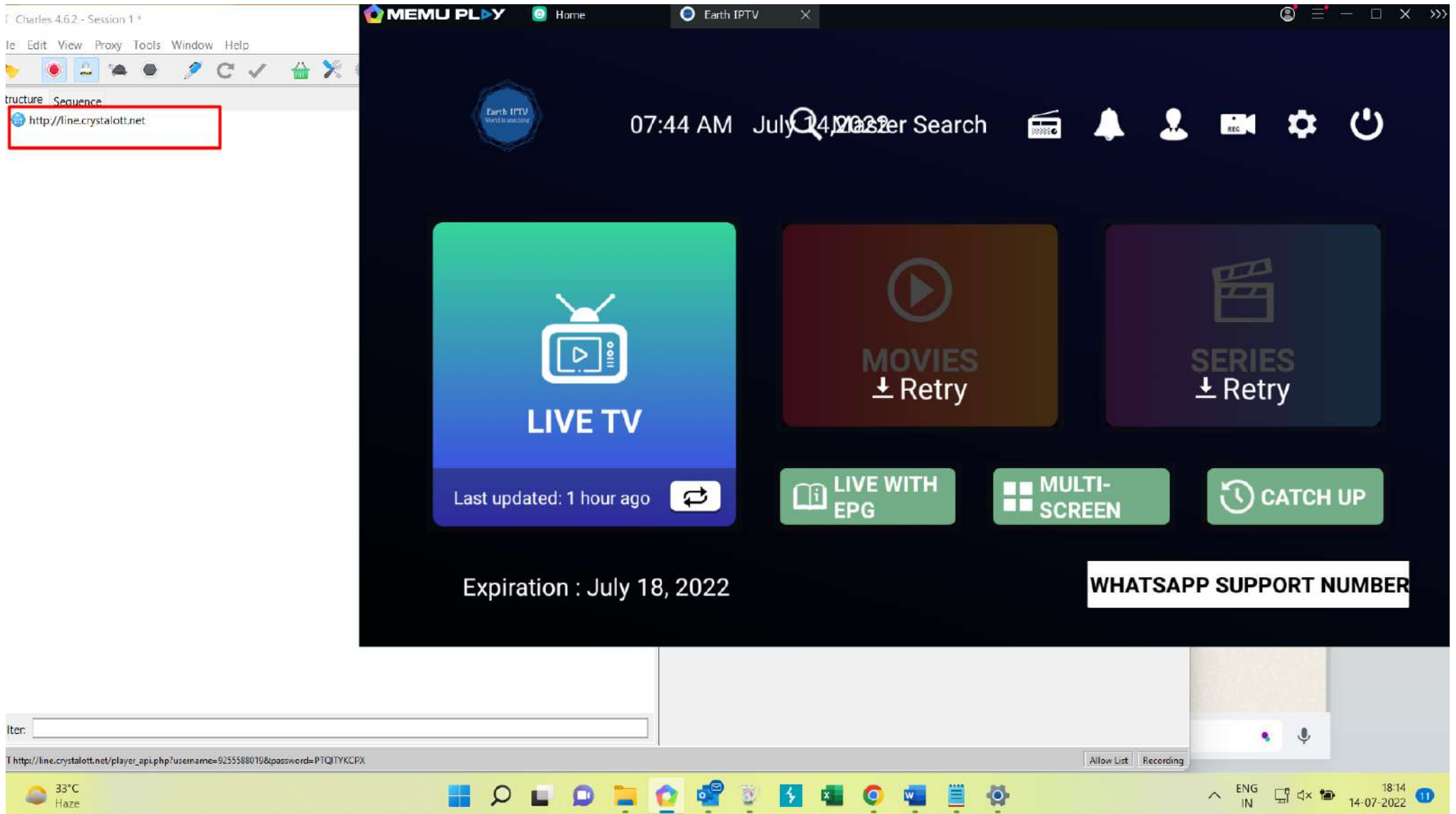


**Step 4:** Before launching the Thop tv pro application, the Investigator launched “Charles Proxy” to capture the data packets (network logs) of the Thop TV pro app.

*Note: Charles Proxy is a cross-platform HTTP debugging proxy server application written in Java. It enables the user to view HTTP, HTTPS, HTTP/2 and enabled TCP port traffic accessed from, to, or via the local computer.*



**Step 5:** The Investigator then launched the Earth IPTV app and simultaneously observed the network logs appearing in Charles Proxy. It was found that the UI was loading through the following URL:



Evidence of unauthorised broadcasting and/or making available of the Plaintiffs' Star Channels on the rogue App, Earth IPTV:

(1) Star Plus:





(2) Star Bharat:

The screenshot shows the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '07:49 AM', and the date 'July 14, 2022'. A search icon and a menu icon are also present.

The central part of the screen is divided into two main sections. On the left is a channel list under the heading 'ASIA| HINDI'. The list contains 14 items, each with a channel icon, a name, and the status 'No Program Found'. Item 12, '|HINDI| STAR BHARAT HD', is highlighted with a teal background. On the right is a video player showing a live broadcast from 'STAR BHARAT HD'. The video content shows a person in a uniform, with text overlays including 'HIJACK DAY', 'हैकिंग का दिन', and 'STAR BHARAT HD'. A 'LIVE TV' badge is visible in the top right corner of the video player. Below the video player, the text 'TV Guide Info downloading...' is displayed.

At the bottom of the screen is a Windows taskbar. It shows the weather as '33°C Haze', several application icons (Start, Search, File Explorer, Edge, etc.), and system tray icons for network, volume, and battery. The system clock shows '18:19' and '14-07-2022'.

Channel Number	Channel Name	Status
6	##  HINDI  GENERAL ##	No Program Found
7	HINDI  DESI PLUS	No Program Found
8	HINDI  ZEE ACTION	No Program Found
9	HINDI  ZEE TV HD	No Program Found
10	HINDI  ZEE CINEMA HD	No Program Found
11	HINDI  ZING	No Program Found
12	HINDI  STAR BHARAT HD	No Program Found
13	HINDI  STAR GOLD HD	No Program Found
14	HINDI  STAR GOLD SELECT..	No Program Found

(3) Star Gold

The screenshot shows the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '07:49 AM', and the date 'July 14, 2022'. A search icon and a menu icon are on the right. The left sidebar is titled 'ASIA | HINDI' and lists 14 channels, all with 'No Program Found' status. The selected channel is '13 |HINDI| STAR GOLD HD'. The main content area shows a live TV preview of a green landscape with a cow, overlaid with 'NEXT | HUNDAMA' and 'STAR GOLD HD' logos. To the right of the preview, there are buttons for 'LIVE TV', 'OLD HD', and '|HINDI|'. Below the preview, the text 'TV Guide Info downloading....' is visible. The bottom status bar shows system information: 33°C Haze, Windows taskbar icons, and system tray icons including 'ENG IN', signal strength, volume, and the date '14-07-2022' with the time '18:19'.

Channel ID	Channel Name	Status
6	##  HINDI  GENERAL ##	No Program Found
7	HINDI  DESI PLUS	No Program Found
8	HINDI  ZEE ACTION	No Program Found
9	HINDI  ZEE TV HD	No Program Found
10	HINDI  ZEE CINEMA HD	No Program Found
11	HINDI  ZING	No Program Found
12	HINDI  STAR BHARAT HD	No Program Found
13	HINDI  STAR GOLD HD	No Program Found
14	HINDI  STAR GOLD SELECT..	No Program Found



(4) Star Gold Select

The screenshot shows the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '07:50 AM', and the date 'July 14, 2022'. A search icon and a menu icon are on the right. The left sidebar shows a channel list under the heading 'ASIA| HINDI'. The list includes channels like 'No Program Found', '|HINDI| STAR GOLD HD', 'CT HD |HINDI| STAR', '|HINDI| STAR PLUS HD', '|HINDI| STAR UTSAV', '|HINDI| STAR UTSAV MOVIE..', '|HINDI| SONY HD', '|HINDI| SONY MAX HD', '|HINDI| SONY MAX 2', and '|HINDI| SONY PIX HD'. The main area features a live TV player showing a group of people in white traditional attire performing a ritual. To the right of the player, there's a 'LIVE TV' button and a 'SELECT HD |HINDI|' label. Below the player, the text 'TV Guide Info downloading....' is visible. The bottom of the screen shows a Windows taskbar with various application icons, system tray icons (weather: 33°C Haze, language: ENG IN, network, volume, battery), and the date/time: 18:20 14-07-2022.

(5) Star Utsav

The screenshot shows the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '08:13 AM', and the date 'July 14, 2022'. A search icon and a menu icon are also present.

The central part of the screen is divided into three sections:

- Left Panel (Channel List):** Titled 'ASIA| HINDI', it lists channels 17 through 25. Channel 17 is 'UTSAV MOVIES |HI|' with 'No Program Found'. Channels 18-25 are various Sony channels (SONY HD, SONY MAX HD, SONY MAX 2, SONY PIX HD, SONY BBC EARTH H., SONY SAB HD, SONY PAL, SONY WAH) all showing 'No Program Found'.
- Middle Panel (Video Player):** Displays a scene from a movie with a family on a sofa. The title 'STAR UTSAV MOVIE' is visible in the top right corner of the player.
- Right Panel (Live TV):** A dark panel with a 'LIVE TV' button and the text '|| STAR UTSAV MOVIE'.

Below the video player, the text 'TV Guide Info downloading....' is displayed.

The bottom of the screen shows a Windows taskbar with the date '14-07-2022', time '18:43', and temperature '34°C Haze'.

(6) Star Sports 2 HD

The screenshot displays the MEMU PLAY IPTV application interface. At the top, the browser address bar shows 'Earth IPTV'. The main header includes 'MEMU PLAY', 'Home', 'Earth IPTV', and the time '08:14 AM July 14, 2022'. A search icon and a menu icon are also present.

The central content area is divided into two main sections. On the left is a channel list under the heading 'ASIA| SPORTS'. The list contains the following entries:

- 305 |SPORTS| STAR SPORTS 1.. No Program Found
- 306 |SPORTS| STAR SPORTS 1.. No Program Found
- 307 HD |SPORTS| STAR No Program Found
- 308 |SPORTS| STAR SPORTS 3 No Program Found
- 309 |SPORTS| STAR SPORTS FIR.. No Program Found
- 310 |SPORTS| STAR SPORTS SE.. No Program Found
- 311 |SPORTS| STAR SPORTS SE.. No Program Found
- 312 |SPORTS| STAR SPORTS TA.. No Program Found
- 313 |SPORTS| TEN 1 HD No Program Found

On the right is a live video player showing a cricket match. The video title is 'LIVE TV |SPORTS| STAR SPORTS 2 HD'. The video content shows a match summary for India vs England. The summary text reads: 'MATCH SUMMARY INDIA 329 ENGLAND 282-8 ENGLAND NEED 48 RUNS TO WIN FROM 30 BALLS'. The video player also displays 'ENG 282-8 OVER 41'. Below the video player, the text 'TV Guide Info downloading....' is visible.

The bottom of the screen shows a Windows taskbar with the date '14-07-2022', time '18:44', and system status including '34°C Haze', 'ENG IN', and a battery icon.


(7) Star Sports 3

MEMU PLAY Home Earth IPTV

Live 08:15 AM July 14, 2022

### ASIA| SPORTS

- 305 |SPORTS| STAR SPORTS 1.. No Program Found
- 306 |SPORTS| STAR SPORTS 1.. No Program Found
- 307 |SPORTS| STAR SPORTS 2.. No Program Found
- 308 |SPORTS| STAR SPORTS 3** No Program Found
- 309 |SPORTS| STAR SPORTS FIR.. No Program Found
- 310 |SPORTS| STAR SPORTS SE.. No Program Found
- 311 |SPORTS| STAR SPORTS SE.. No Program Found
- 312 |SPORTS| STAR SPORTS TA.. No Program Found
- 313 |SPORTS| TEN 1 HD No Program Found



LIVE TV  
SPORTS 3 |SPOR

TV Guide Info downloading....

34°C Haze 18:45 14-07-2022



(8) Star Sports 1 HD Select

The screenshot shows the MEMU PLAY IPTV interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '08:15 AM', and the date 'July 14, 2022'. A search icon and a menu icon are on the right. The left sidebar is titled 'ASIA| SPORTS' and contains a list of channels:

- 305 |SPORTS| STAR SPORTS 1.. No Program Found
- 306 |SPORTS| STAR SPORTS 1.. No Program Found
- 307 |SPORTS| STAR SPORTS 2.. No Program Found
- 308 |SPORTS| STAR SPORTS 3 No Program Found
- 309 |SPORTS| STAR SPORTS FIR.. No Program Found
- 310 |SPORTS| STAR SPORTS SE... No Program Found
- 311 |SPORTS| STAR SPORTS SE.. No Program Found
- 312 |SPORTS| STAR SPORTS TA.. No Program Found
- 313 |SPORTS| TEN 1 HD No Program Found

The main content area shows a live soccer match. The video frame displays players in red and white kits on a green field. A large banner in the background reads '& LEICESTER'. The channel logo 'STAR SPORTS SELECT HD' is visible in the top right corner of the video. To the right of the video, there's a 'LIVE TV' button and the text '|SPORTS| STAR S...'. Below the video, the text 'TV Guide Info downloading....' is displayed. At the bottom, a Windows taskbar is visible with various application icons, system tray icons (including weather: 34°C Haze, and date: 14-07-2022), and a battery icon.

(9) Star Sports Tamil

The screenshot displays the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header shows 'Live' status, the time '08:16 AM', and the date 'July 14, 2022'. A search icon and a menu icon are also present.

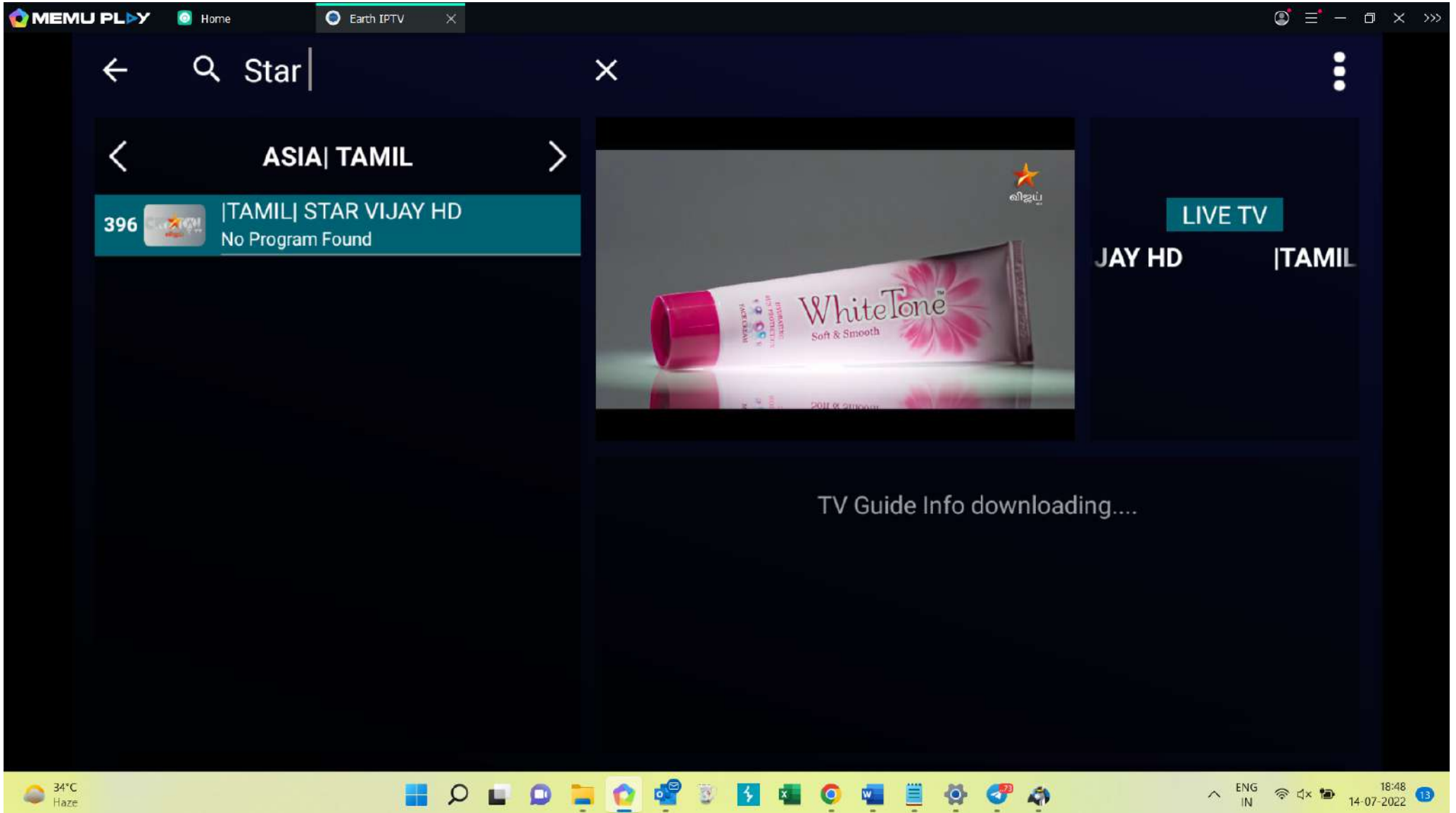
The central part of the screen is divided into two main sections. On the left is a channel list under the heading 'ASIA| SPORTS'. The list includes channels 308 through 316, each with a small icon and the text 'No Program Found'. Channel 312, 'SPORTS TAMIL', is highlighted in a teal color. On the right is a large video player window. The top right of the player has a 'LIVE TV' label and the channel name 'STAR SPORTS TAMIL'. The video content shows a cricket match with a scoreboard at the bottom. The scoreboard indicates 'ENG 318-9' and 'IND 91-81'. The text 'TV Guide Info downloading...' is displayed below the video player.

At the bottom of the screen is a Windows taskbar. It shows the system tray with weather information (34°C Haze), system icons (Wi-Fi, volume, battery), and the date '14-07-2022' with the time '18:46'. The taskbar contains various application icons including File Explorer, Microsoft Edge, and other utilities.

(10) Asianet HD:

The screenshot shows the MEMU PLAY IPTV application interface. At the top, there's a navigation bar with 'MEMU PLAY', 'Home', and 'Earth IPTV' tabs. The main header displays 'Live', the time '08:17 AM', and the date 'July 14, 2022'. A search icon and a menu icon are on the right. The left sidebar shows a list of channels under the heading 'ASIA| MALAYALAM'. Channel 323, '|MALAYALAM| ASIANET HD', is selected and highlighted in teal. Below the list, a video player shows a live broadcast of a yellow smoothie being blended in a Faber blender. To the right of the video, a 'LIVE TV' button and the text 'MALAYALAM| ASIANET HD' are visible. Below the video, the text 'TV Guide Info downloading....' is displayed. At the bottom, a Windows taskbar shows the system tray with weather (34°C Haze), language (ENG IN), and time (18:47 14-07-2022).

Channel ID	Channel Name	Status
321	MALAYALAM  AMRITHA TV	No Program Found
322	MALAYALAM  MIDDLE EAST	No Program Found
323	MALAYALAM  ASIANET HD	No Program Found
324	MALAYALAM  ASIANET MO..	No Program Found
325	MALAYALAM  ASIANET NE..	No Program Found
326	MALAYALAM  ASIANET PL..	No Program Found
327	MALAYALAM  DD MALAYAL..	No Program Found
328	MALAYALAM  FLOWERS TV	No Program Found
329	MALAYALAM  JAIHIND TV	No Program Found



MEMU PLAY Home Earth IPTV

Star

ASIA| TAMIL

396 |TAMIL| STAR VIJAY HD  
No Program Found

WhiteTone  
Soft & Smooth

LIVE TV  
JAY HD | TAMIL

TV Guide Info downloading....

34°C Haze

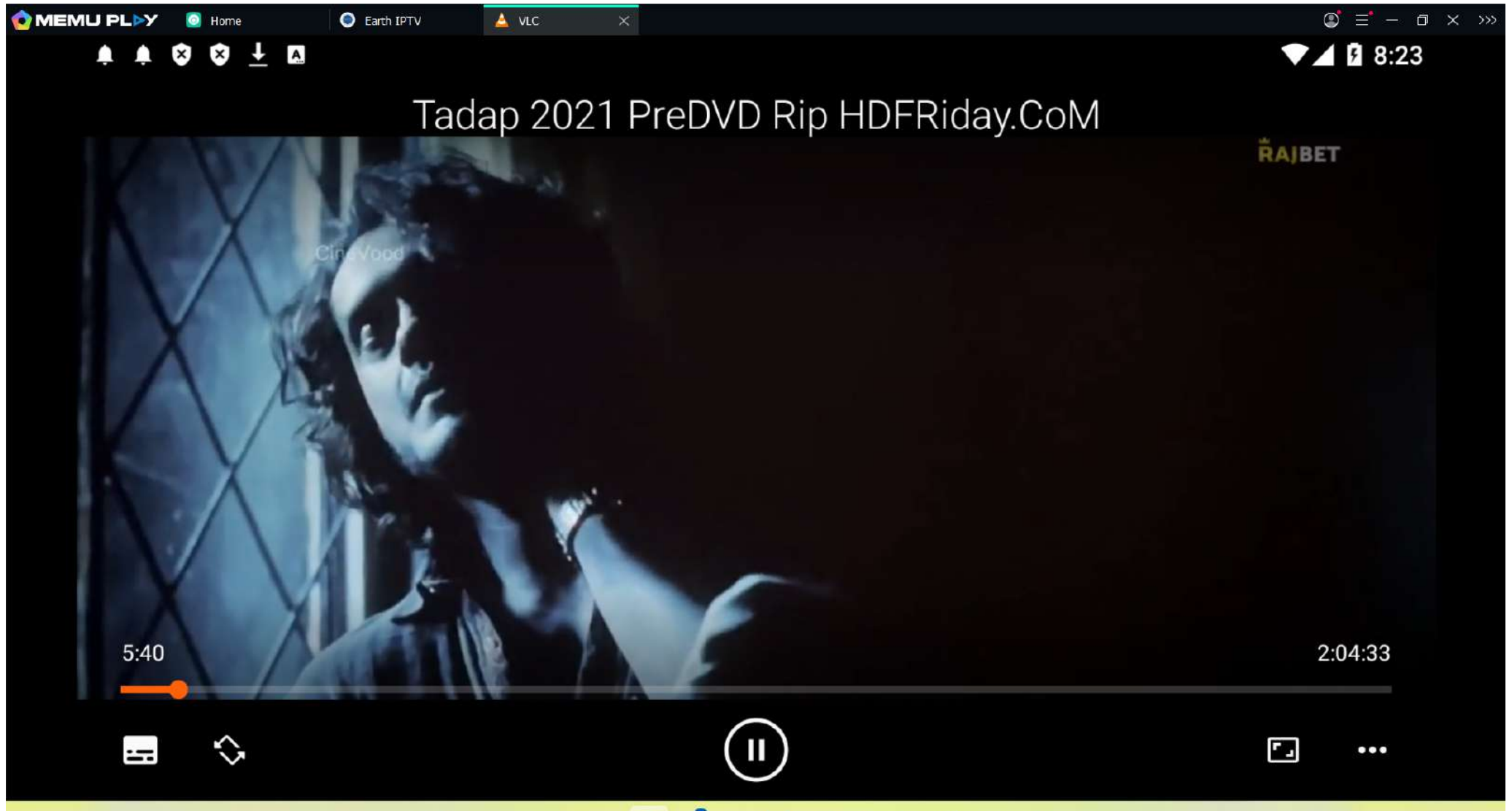
ENG IN

18:48 14-07-2022



Evidence of infringement of the Plaintiffs' Content on the rogue App, Earth IPTV:

(1) Tadap



(2) Atrangi Re

The image shows a video player interface on a desktop. The video content displays a scene from the movie 'Atrangi Re' where a man in a grey tank top is lying on a patterned rug, surrounded by people. The video player has a progress bar at 17:46 out of 2:17:50. The URL 'www.7MovieRulz.pe' is overlaid on the video. The desktop taskbar at the bottom shows various application icons, system tray icons, and the date '14-07-2022'.

MEMU PLAY Home Earth IPTV VLC

www.7MovieRulz.pe

17:46 2:17:50

34°C Haze

ENG IN 18:53 14-07-2022

(3) Aarya (Season 1)

MEMU PLAY Home Earth IPTV VLC

Aarya 2020 S01E01 Hindi 720p WEBRip x264 AAC ESubs - LOKiHD - Telly

3:33 55:26

Naveen.

34°C Haze

18:54 14-07-2022

(4) 1962: The War in the Hills

MEMU PLAY Home Earth IPTV VLC

www.4MovieRulz.lu

9:59 7:06:01

34°C ENG 18:55




**Step 6:** The Investigator checked the application after blocking the user interface (UI) / server domain at firewall level and found that the content available on the rogue App is unable to play / load subsequent such blocking..

The following user interface (UI) / server domain was blocked by the Investigator for this purpose: line.crystalott.net

<http://172.168.1.1:8090/ips/block/webcat?cat=1025&pl=1&url=aHR0cDovL2xpbnUuY3J5c3Rhbg90dC5uZXQv>

← → ↻ Not secure | 172.168.1.1:8090/ips/block/webcat?cat=1025&pl=1&url=aHR0cDovL2xpbnUuY3J5c3Rhbg90dC5uZXQv

**SOPHOS**



## Stop! This website is blocked

The administrator of this network has restricted access to sites categorized as IP TV.

If you think this is incorrect, you may suggest a different category.

[Return to previous page](#) [Login to network](#)

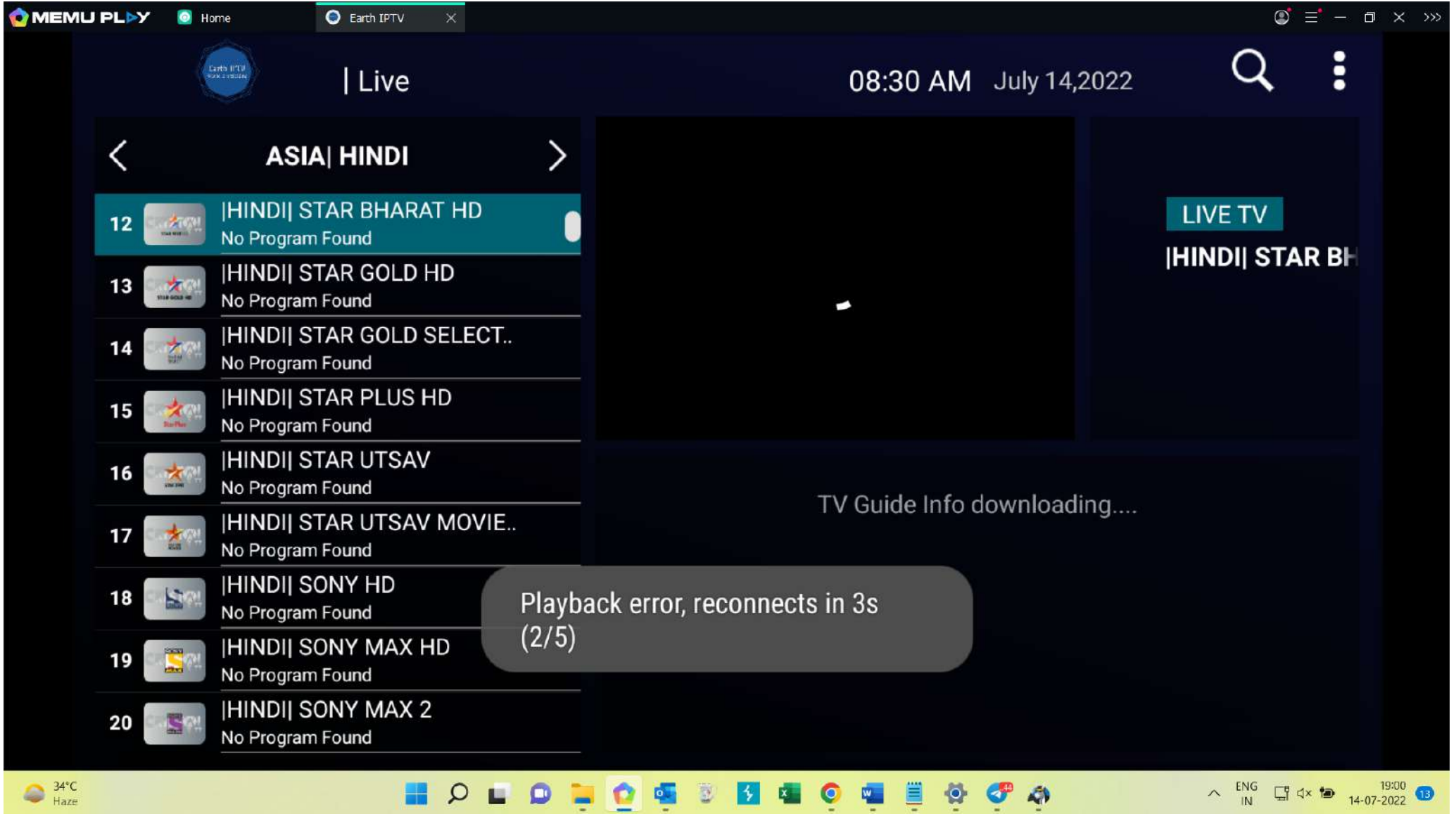
[About this request](#)

Protected by **SOPHOS**

29°C Cloudy

ENG IN 14:55 12-07-2022

The below image shows that the content available on the application was unable to stream / load after blocking of the user interface (UI) domains of the rogue Earth IPTV App at the firewall level / the backend.



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Out Now

# Knights of Wales

I'm a paragraph. Click here to add your own text and edit me. It's easy. Just click "Edit Text" or double click me to add your own content and make changes to the font.

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[Let's Chat!](#)

Films | TV Shows | Creative Development

# About Earth IPTV Productions

We are leading IPTV Brand now in India

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GSL Newsletter

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# earthiptv.club

Updated 3 days ago

Interested in similar domains?

## Domain Information

Domain:	earthiptv.club
Registrar:	GoDaddy.com, LLC
Registered On:	2021-09-14
Expires On:	2022-09-14
Updated On:	2021-09-19
Status:	clientTransferProhibited clientUpdateProhibited clientRenewProhibited clientDeleteProhibited
Name Servers:	ns13.wixdns.net ns12.wixdns.net

[humanityiptv.com](#) Buy Now

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[earthadsl.com](#) Buy Now

[earthiptv.net](#) Buy Now

[humanityiptv.net](#) Buy Now

## Registrant Contact

Organization:	Domains By Proxy, LLC
State:	Arizona
Country:	US

## Raw Whois Data

```

Domain Name: earthiptv.club
Registry Domain ID: D452A6CC104754B10A42E65225A85F56C-GDREG
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: whois.godaddy.com
Updated Date: 2021-09-19T19:15:08Z
Creation Date: 2021-09-14T19:15:07Z
Registry Expiry Date: 2022-09-14T19:15:07Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization: Domains By Proxy, LLC
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Arizona
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: US
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY

```

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Registrant Fax Ext: REDACTED FOR PRIVACY  
 Registrant Email: Please query the RDDS service of the Registrar of Record identified in  
 Registry Admin ID: REDACTED FOR PRIVACY  
 Admin Name: REDACTED FOR PRIVACY  
 Admin Organization: REDACTED FOR PRIVACY  
 Admin Street: REDACTED FOR PRIVACY  
 Admin Street: REDACTED FOR PRIVACY  
 Admin Street: REDACTED FOR PRIVACY  
 Admin City: REDACTED FOR PRIVACY  
 Admin State/Province: REDACTED FOR PRIVACY  
 Admin Postal Code: REDACTED FOR PRIVACY  
 Admin Country: REDACTED FOR PRIVACY  
 Admin Phone: REDACTED FOR PRIVACY  
 Admin Phone Ext: REDACTED FOR PRIVACY  
 Admin Fax: REDACTED FOR PRIVACY  
 Admin Fax Ext: REDACTED FOR PRIVACY  
 Admin Email: Please query the RDDS service of the Registrar of Record identified in  
 Registry Tech ID: REDACTED FOR PRIVACY  
 Tech Name: REDACTED FOR PRIVACY  
 Tech Organization: REDACTED FOR PRIVACY  
 Tech Street: REDACTED FOR PRIVACY  
 Tech Street: REDACTED FOR PRIVACY  
 Tech Street: REDACTED FOR PRIVACY  
 Tech City: REDACTED FOR PRIVACY  
 Tech State/Province: REDACTED FOR PRIVACY  
 Tech Postal Code: REDACTED FOR PRIVACY  
 Tech Country: REDACTED FOR PRIVACY  
 Tech Phone: REDACTED FOR PRIVACY  
 Tech Phone Ext: REDACTED FOR PRIVACY  
 Tech Fax: REDACTED FOR PRIVACY  
 Tech Fax Ext: REDACTED FOR PRIVACY  
 Tech Email: Please query the RDDS service of the Registrar of Record identified in  
 Name Server: ns13.wixdns.net  
 Name Server: ns12.wixdns.net  
 DNSSEC: unsigned  
 URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>  
 >>> Last update of WHOIS database: 2022-07-11T07:26:13Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

The Service is provided so that you may look up certain information in relation to  
 Use of the Service is subject to our policies, in particular you should familiarise

The information provided by this Service is 'as is' and we make no guarantee of it

You agree that by your use of the Service you will not use the information provided  
 \* inconsistent with any applicable laws,  
 \* inconsistent with any policy issued by us,  
 \* to generate, distribute, or facilitate unsolicited mass email, promotions, advert  
 \* to enable high volume, automated, electronic processes that apply to the Service.

You acknowledge that:

\* a response from the Service that a domain name is 'available', does not guarantee  
 \* we may restrict, suspend or terminate your access to the Service at any time, and  
 \* the copying, compilation, repackaging, dissemination or other use of the informat

This information has been prepared and published in order to represent administrati

We may discontinue or amend any part or the whole of these Terms of Service from ti

## related domain names

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Whois earthiptv.club

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Dedicated Servers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

SiteLock

CodeGuard

**45**

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

**Support**

View Knowledge Base

Contact Support

Report Abuse

About Whois



Hotstar Enforcement &lt;hotstar\_enforcement@markscan.in&gt;

**[Notice ID:54564454] Copyright Infringement Notice under DMCA Act**

1 message

**Hotstar Enforcement** <hotstar\_enforcement@markscan.in>  
To: addmaxpromoter@gmail.com

Thu, Jul 14, 2022 at 7:52 PM

Dear Sir/Madam,

**Sub: Takedown of content illegally hosted on your server: Earth IPTV**

We, **MarkScan**, act on behalf of our Clients, **Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited** having their registered office at Star House, Urmi Estate, 95, Ganpatrao Kadam Marg, Lower Parel (W), Mumbai-400013. We are under instructions to address you as under:

Our Client, Star India Pvt. Ltd. is amongst India's most diverse media companies. It owns and operates various entertainment channels, including the popular channels Star Plus, Star Jalsha, Channel V, Life OK, etc. (hereinafter "STAR Channels"), which are statutorily licensed by the Ministry of Information and Broadcasting. Consequently, the exclusive right to broadcast, rebroadcast, transmit and communicate to the public the STAR Channels and the content broadcast therein vests in Our Client.

It is also brought to your notice that Our Client, Novi Digital has exclusive rights to broadcast, telecast and/or communicate to the public, content aired on STAR Channels on the digital platform, "**Hotstar**". No other entity can, without authorization from Our Clients, upload, stream, make available for download, broadcast, and/or communicate to the public, content that is aired on the STAR Channels, in any manner whatsoever, (live, delayed, repeat, etc.) through any transmission platform including the internet for viewing on various devices such as computers, laptops, mobile phones, tablet computers, etc.

**Star India Pvt. Ltd.** is the exclusive owner of the "**Star Channels**". In addition to the above, Star India Pvt. Ltd. is the exclusive owner of several trademarks connected with "**Star's Channels**".

We have come across that the pirate **IPTV 'Earth IPTV'** is illegally streaming (Live Tv channels) of Star India without any authorization.

**Earth IPTV** is a pirate **IPTV/OTT** service provider which has been illegally broadcasting the signals of the Indian origin channels and certain others using regional Indian television networks which are members of IBF) for quite some time.

**Below is the streaming URL for your reference**

<https://www.earthiptv.club/>

**Proof evidence that the content being infringed is owned by STAR India Pvt. Ltd. and Novi Digital Entertainment Pvt. Ltd. is available at the following links:**

<https://www.hotstar.com/in/channels/>  
<https://www.startv.com/about-us/entertainment/>

Accordingly, this notice is an official notification as required under the Digital Millennium Copyright Act ("DMCA") and the Information Technology (Intermediary Guidelines) Rules 2011 framed under the Information Technology Act, 2000 regarding the infringement and violation of the copyright of Novi Digital Entertainment Pvt. Ltd. (Rights Holder) is protected under the Indian Copyright Act, 1957, through the intermediary's portal. The unauthorized distribution of the Rights Holder's content may also amount to a violation of the Online Copyright Infringement Liability Limitation Act (OCILLA), which is a part of the Digital Millennium Copyright Act, 1998.

We believe that the information in this letter is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this in good faith and with reasonable belief that the use of the content owned by the Rights Holder in the manner as highlighted herein above through your hosting servers has not been authorized by the Rights Holder, their agents and/or under the law.

Under penalty of perjury, we, MarkScan, are the authorized Online Antipiracy Solution Providers to write to you on behalf

of Novi, and our letter of authorization can be accessed via the secured URL below. This notification is sent to you is accurate and without prejudice to the rights and remedies of Rights Holders, all of which are expressly reserved. Our complete details are available at the signature below.

[http://markscan.co.in/LOA\\_HOTSTAR.pdf](http://markscan.co.in/LOA_HOTSTAR.pdf)

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital  
Ishita Singh  
Markscan  
E-14C, 1st Floor, Sector 8, Noida

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited  
Star House, Urmi Estate,  
95, Ganpatrao Kadam Marg,  
Lower Parel (W), Mumbai- 400013

Regards,  
MarkScan Enforcement Team




WHOIS

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# crystalott.net

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## Domain Information

Domain:	crystalott.net
Registrar:	Name.com, Inc.
Registered On:	2020-07-04
Expires On:	2023-07-04
Updated On:	2022-06-11
Status:	clientTransferProhibited
Name Servers:	dolly.ns.cloudflare.com ian.ns.cloudflare.com

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[crystalotto.net](#) Buy Now

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## Registrant Contact

Name:	Whois Agent
Organization:	Domain Protection Services, Inc.
Street:	PO Box 1769
City:	Denver
State:	CO
Postal Code:	80201
Country:	US
Phone:	+1.7208009072
Fax:	+1.7209758725
Email:	<a href="https://www.name.com/contact-domain-whois/crystalott.net">https://www.name.com/contact-domain-whois/crystalott.net</a>

## .space

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\*Offer ends 31st July 2022

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## Administrative Contact

Name:	Whois Agent
Organization:	Domain Protection Services, Inc.
Street:	PO Box 1769
City:	Denver
State:	CO
Postal Code:	80201
Country:	US
Phone:	+1.7208009072



Fax: +1.7209758725

Email: <https://www.name.com/contact-domain-whois/crystalott.net>

### Technical Contact

Name: Whois Agent

Organization: Domain Protection Services, Inc.

Street: PO Box 1769

City: Denver

State: CO

Postal Code: 80201

Country: US

Phone: +1.7208009072

Fax: +1.7209758725

Email: <https://www.name.com/contact-domain-whois/crystalott.net>

### Raw Whois Data

Domain Name: CRYSTALOTT.NET  
 Registry Domain ID: 2543648374\_DOMAIN\_NET-VRSN  
 Registrar WHOIS Server: whois.name.com  
 Registrar URL: http://www.name.com  
 Updated Date: 2022-06-11T16:45:19Z  
 Creation Date: 2020-07-04T00:38:55Z  
 Registrar Registration Expiration Date: 2023-07-04T00:38:55Z  
 Registrar: Name.com, Inc.  
 Registrar IANA ID: 625  
 Reseller:  
 Domain Status: clientTransferProhibited <https://www.icann.org/epp#clientTransferPro>  
 Registry Registrant ID: Not Available From Registry  
 Registrant Name: Whois Agent  
 Registrant Organization: Domain Protection Services, Inc.  
 Registrant Street: PO Box 1769  
 Registrant City: Denver  
 Registrant State/Province: CO  
 Registrant Postal Code: 80201  
 Registrant Country: US  
 Registrant Phone: +1.7208009072  
 Registrant Fax: +1.7209758725  
 Registrant Email: <https://www.name.com/contact-domain-whois/crystalott.net>  
 Registry Admin ID: Not Available From Registry  
 Admin Name: Whois Agent  
 Admin Organization: Domain Protection Services, Inc.  
 Admin Street: PO Box 1769  
 Admin City: Denver  
 Admin State/Province: CO  
 Admin Postal Code: 80201  
 Admin Country: US  
 Admin Phone: +1.7208009072  
 Admin Fax: +1.7209758725  
 Admin Email: <https://www.name.com/contact-domain-whois/crystalott.net>  
 Registry Tech ID: Not Available From Registry  
 Tech Name: Whois Agent  
 Tech Organization: Domain Protection Services, Inc.  
 Tech Street: PO Box 1769  
 Tech City: Denver  
 Tech State/Province: CO  
 Tech Postal Code: 80201  
 Tech Country: US  
 Tech Phone: +1.7208009072  
 Tech Fax: +1.7209758725

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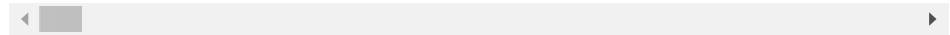
**\$3.58** /mo

VIEW MORE

Tech Email: <https://www.name.com/contact-domain-whois/crystalott.net>  
 Name Server: [ian.ns.cloudflare.com](https://ian.ns.cloudflare.com)  
 Name Server: [dolly.ns.cloudflare.com](https://dolly.ns.cloudflare.com)  
 DNSSEC: unSigned  
 Registrar Abuse Contact Email: [abuse@name.com](mailto:abuse@name.com)  
 Registrar Abuse Contact Phone: +1.7203101849  
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>  
 >>> Last update of WHOIS database: 2022-07-11T07:07:42Z <<<

For more information on Whois status codes, please visit <https://icann.org/epp>

The data in the Name.com, Inc. WHOIS database is provided by Name.com, Inc. for inf



### related domain names

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Hotstar Enforcement &lt;hotstar\_enforcement@markscan.in&gt;

**[Notice ID:546213132] Copyright Infringement Notice under DMCA Act**

1 message

**Hotstar Enforcement** <hotstar\_enforcement@markscan.in>  
To: abuse@v-sys.org

Thu, Jul 14, 2022 at 9:49 PM

Dear Sir/Madam,

**Sub: Takedown of content illegally hosted on your server: Earth IPTV**

We, **MarkScan**, act on behalf of our Clients, **Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited** having their registered office at Star House, Urmi Estate, 95, Ganpatrao Kadam Marg, Lower Parel (W), Mumbai-400013. We are under instructions to address you as under:

Our Client, Star India Pvt. Ltd. is amongst India's most diverse media companies. It owns and operates various entertainment channels, including the popular channels Star Plus, Star Jalsha, Channel V, Life OK, etc. (hereinafter "STAR Channels"), which are statutorily licensed by the Ministry of Information and Broadcasting. Consequently, the exclusive right to broadcast, rebroadcast, transmit and communicate to the public the STAR Channels and the content broadcast therein vests in Our Client.

It is also brought to your notice that Our Client, Novi Digital has exclusive rights to broadcast, telecast and/or communicate to the public, content aired on STAR Channels on the digital platform, "**Hotstar**". No other entity can, without authorization from Our Clients, upload, stream, make available for download, broadcast, and/or communicate to the public, content that is aired on the STAR Channels, in any manner whatsoever, (live, delayed, repeat, etc.) through any transmission platform including the internet for viewing on various devices such as computers, laptops, mobile phones, tablet computers, etc.

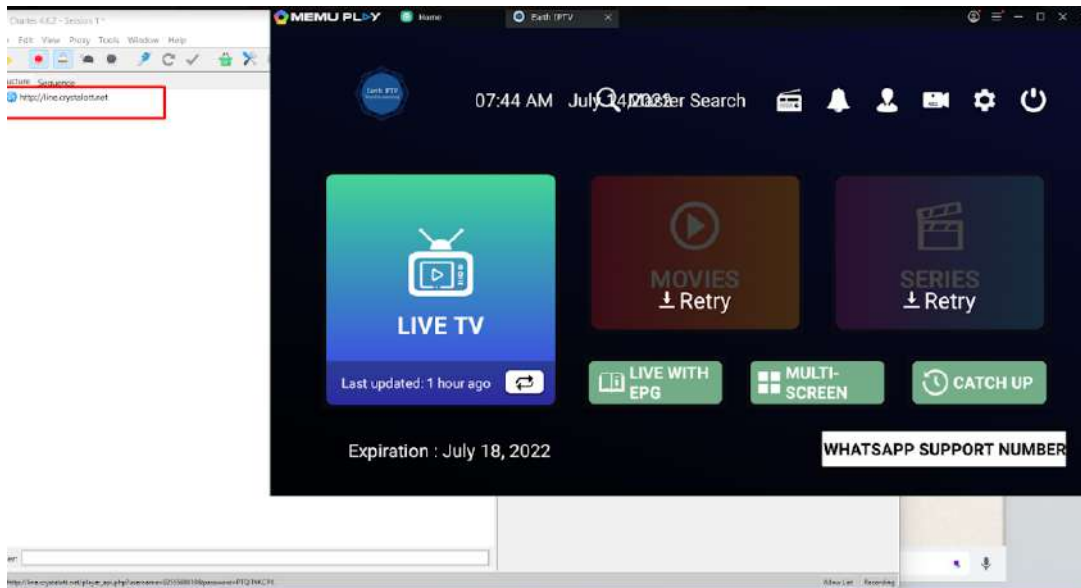
**Star India Pvt. Ltd.** is the exclusive owner of the "**Star Channels**". In addition to the above, Star India Pvt. Ltd. is the exclusive owner of several trademarks connected with "**Star's Channels**".

We have come across that the pirate **IPTV 'Earth IPTV'** is illegally using your server to stream the copyright content (**Live TV Channels**) illegally.

**Earth IPTV** is a pirate **IPTV/OTT** service provider which has been illegally broadcasting the signals of the Indian origin channels and certain others using regional Indian television networks which are members of IBF) for quite some time.

Based on our investigation, we have found that **Earth IPTV** is using "[line.crystalott.net](http://line.crystalott.net)" to provide the illegal streams of Star India Private Limited/ Novi Digital Private limited which is further indulged in the act of copyright piracy by providing unauthorized streams of digital content without the consent of the copyright owner. Please refer to the evidence for your reference. Please act expeditiously to remove or disable access to the infringing material as listed below.

**Below is the screenshot for your reference:-**



**Below is the streaming URL for your reference**

<http://line.crystalott.net/xmltv.php?username=XXXXX&password=XXXX>

**Domain IP address for your reference:- 62.182.81.226**

**Proof evidence that the content being infringed is owned by STAR India Pvt. Ltd. and Novi Digital Entertainment Pvt. Ltd. is available at the following links:**

<https://www.hotstar.com/in/channels/>

<https://www.startv.com/about-us/entertainment/>

Accordingly, this notice is an official notification as required under the Digital Millennium Copyright Act ("DMCA") and the Information Technology (Intermediary Guidelines) Rules 2011 framed under the Information Technology Act, 2000 regarding the infringement and violation of the copyright of Novi Digital Entertainment Pvt. Ltd. (Rights Holder) is protected under the Indian Copyright Act, 1957, through the intermediary's portal. The unauthorized distribution of the Rights Holder's content may also amount to a violation of the Online Copyright Infringement Liability Limitation Act (OCILLA), which is a part of the Digital Millennium Copyright Act, 1998.

We believe that the information in this letter is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this in good faith and with reasonable belief that the use of the content owned by the Rights Holder in the manner as highlighted herein above through your hosting servers has not been authorized by the Rights Holder, their agents and/or under the law.

Under penalty of perjury, we, MarkScan, are the authorized Online Antipiracy Solution Providers to write to you on behalf of Novi, and our letter of authorization can be accessed via the secured URL below. This notification is sent to you is accurate and without prejudice to the rights and remedies of Rights Holders, all of which are expressly reserved. Our complete details are available at the signature below.

[http://markscan.co.in/LOA\\_HOTSTAR.pdf](http://markscan.co.in/LOA_HOTSTAR.pdf)

**DIGITAL SIGNATURE FOR COPYRIGHT CLAIM**

Authorized online digital content production representative for Novi Digital  
Ishita Singh  
Markscan  
E-14C, 1st Floor, Sector 8, Noida

**INTELLECTUAL PROPERTY OWNERS:**

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited  
Star House, Urmi Estate,  
95, Ganpatrao Kadam Marg,  
Lower Parel (W), Mumbai- 400013

7/14/22, 9:49 PM

MarkScan Mail - [Notice ID:546213132] Copyright Infringement Notice under DMCA Act

**53**

Regards,  
MarkScan Enforcement Team





## AUTHORITY LETTER

Pursuant to the resolution passed by the Board of Directors of Star India Private Limited (“Company”) at their board meeting held on November 11, 2019, I, Ankush Mahajan, do hereby authorize Amrita Mukherjee, Abhishek Praharaj and Diksha Snehal to sign, affirm and file, for and on behalf of the Company all papers, documents, complaints, applications, plaints, petitions, statements of claim, appeals, vakalatnamas, affidavits, rejoinders and any related pleadings and represent the Company before appropriate authorities and courts in India.

Given by me at Gurgaon on this 16<sup>th</sup> day of March, 2022.

For and on behalf of

Star India Pvt Ltd



Ankush Mahajan

Encl: Certified copy of the board resolution dated November 11, 2019



**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED THROUGH CIRCULATION BY BOARD OF DIRECTORS OF STAR INDIA PRIVATE LIMITED ("COMPANY") ON NOVEMBER 11, 2019**

**CHANGE IN AUTHORISED SIGNATORIES FOR SIGNING DOCUMENTS AND REPRESENTING THE COMPANY IN ANY LEGAL PROCEEDINGS INSTITUTED BY OR AGAINST THE COMPANY**

**"RESOLVED THAT** superseding the earlier resolution passed in this regard at the meeting of Board of Directors held on October 14, 2019 in this regard, any Director of the Company, Deepak Jacob, Sanjay Jain, Sheenaz H. Dastur, Mihir Rale, Surender Mann, Nabankur Acharya, Ankush Mahajan, Ram Panchal, Ashok Yadav, Naveen Kumar Dodla, Sachin Sharma, Wasif Gilani, Pankaj Nath, K. Aravamudhan, Prasad K, Paras Doshi, Vikrant Patwardhan, Sujit Vaidya, Subha Ray, Ranjita Menon and Hitender Adlakha be and are hereby empowered and authorized, as authorized representatives and signatories, to jointly and severally do the following:

- a) to sign all papers, applications, complaints, petition, vakalatnamas and all other documents, affidavits as may be required to be filed in the Consumer Forums/Small Causes Court/ District Courts/High Court/Supreme Court or before any other Government authority, Tribunal, Consumer Forums and/or local authorities in connection with any legal proceedings instituted by or against the Company and to represent the Company in all other matters incidental thereto as may be considered necessary and expedient including the authority to withdraw the complaint(s)/case(s)/proceeding(s); and,
- b) to issue power of attorneys to concerned persons, as they deem fit, for the purpose of initiating legal action (civil and/or criminal), on behalf of the Company, for curbing illegal and unauthorized transmission and distribution of STAR channels by any person, cable operator, Multi Service Operator or party and for any other legal action taken by or against the Company.

**RESOLVED FURTHER THAT** any Director of the Company, Deepak Jacob, Sanjay Jain, Sheenaz H. Dastur, Mihir Rale, Surender Mann, Nabankur Acharya, Ankush Mahajan, Ram Panchal, Ashok Yadav, Naveen Kumar Dodla, Sachin Sharma, Wasif Gilani, Pankaj Nath, K. Aravamudhan, Prasad K, Paras Doshi, Vikrant Patwardhan, Sujit Vaidya, Subha Ray, Ranjita Menon and Hitender Adlakha be and are hereby jointly and severally authorized to further delegate any one or more of the above said powers to such persons, either jointly or severally, as they deem fit to do so, for and on behalf of the Company.

**Star India Pvt. Ltd.**

**Registered Office**

Star House, Urmi Estate,  
95 Ganpatrao Kadam Marg, Lower Parel (West),  
Mumbai 400 013, India.  
CIN : U72300MH1994PTC076485

Telephone : + 91 22 6630 5555  
Fax : + 91 22 6630 5050  
Website : www.startv.com



RESOLVED FURTHER THAT any Director and/or Company Secretary of the Company, be and is hereby authorized to issue certified true copies of the aforesaid resolution to all concerned as may be required from time to time."

//Certified True Copy//

For and on behalf of  
Star India Private Limited

A handwritten signature in black ink, appearing to read "Amita", written over a horizontal line.

Amita Maheshwari  
Director  
DIN: 02891889

Date: December 24, 2019  
Place: Mumbai

## AUTHORITY LETTER

Pursuant to the resolution passed by the Board of Directors of Novi Digital Entertainment Private Limited ("Company") at their board meeting held on April 3, 2018, I, Ankush Mahajan, do hereby authorize Diksha Snehal and Abhishek Praharaj (to sign, affirm and file, for and on behalf of the Company all papers, documents, complaints, applications, plaints, petitions, statements of claim, appeals, vakalatnamas, affidavits, rejoinders and any related pleadings and represent the Company before appropriate authorities and courts in India.

Given by me at Gurgaon on this 26<sup>th</sup> day of March, 2022.

For and on behalf of

Novi Digital Entertainment Pvt Ltd



Ankush Mahajan

Encl: Certified copy of the board resolution dated August 3, 2018



CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT 1/2018-2019 MEETING OF THE BOARD OF DIRECTORS OF NOVI DIGITAL ENTERTAINMENT PRIVATE LIMITED ("COMPANY") HELD ON TUESDAY, APRIL 3, 2018 AT THE BOARD ROOM, 37<sup>TH</sup> FLOOR, STAR HOUSE, URMI ESTATE, 95 GANPATRAO KADAM MARG, LOWER PAREL (WEST), MUMBAI - 400013 COMMENCED AT 10:30 A.M. AND CONCLUDED AT 11:30 A.M.

**CHANGE IN AUTHORISED SIGNATORIES FOR SIGNING DOCUMENTS AND REPRESENTING THE COMPANY IN ANY LEGAL PROCEEDINGS INSTITUTED BY OR AGAINST THE COMPANY**

"RESOLVED THAT in suppression of the earlier resolution passed in this regard at the meeting of Board of Directors of the Company held on April 19, 2017, any Director of the Company, Deepak Jacob, Sanjay Jain, Ujwala P. Wakhle, Sheenaz H. Dastur, Mihir Rale, Shyamala V, Surender Mann, Amrita Mukherjee, Ankush Mahajan, Rajkumar Varier, Wasif Gilani, Pankaj Nath and Ashok Yadav be and are hereby empowered and authorized, as authorized representatives and signatories, to jointly and severally do the following:

- a) to sign all papers, applications, complaints, petition, vakalatnamas and all other documents, affidavits as may be required to be filed in the Consumer Forums/Small Causes Court/District Courts/High Court/Supreme Court or before any other Government authority, Tribunal, Consumer Forums and/or local authorities in connection with any legal proceedings instituted by or against the Company and to represent the Company in all other matters incidental thereto as may be considered necessary and expedient; and,
- b) to issue power of attorneys to concerned persons, as they deem fit, for the purpose of initiating legal action (civil and/or criminal), on behalf of the Company for curbing illegal and unauthorized transmission and distribution of content owned or licensed by the Company by any person and for any other legal action taken by or against the Company.

RESOLVED FURTHER THAT any Director of the Company, Deepak Jacob, Sanjay Jain, Ujwala P. Wakhle, Sheenaz H. Dastur, Mihir Rale, Shyamala V, Surender Mann, Amrita Mukherjee, Ankush Mahajan, Rajkumar Varier, Pankaj Nath and Ashok Yadav be and are hereby jointly and severally authorized to further delegate any one or more of the above said powers to such persons, either jointly or severally, as they deem fit to do so, for and on behalf of the Company.



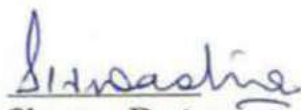


**RESOLVED FURTHER THAT** the power delegated as aforesaid by the Board shall be valid from the date hereof till such authority is revoked by the Board at its discretion.

**RESOLVED FURTHER THAT** any Director of the Company, be and is hereby authorized to issue certified true copies of the aforesaid resolution to all concerned as may be required from time to time."

**Certified True Copy**

For and on behalf of  
**Novi Digital Entertainment Private Limited**



Sheenaz Dastur  
Director  
DIN: 07820499



Date: August 03, 2018  
Place: Mumbai