

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-19/2022-DS-II

Dated:26-07-2022

To,

All Internet Service Licensees'

**Subject: CS (Comm) No. 275 of 2022; Hindustan Unilever Ltd & Anr. v/s Unilever1.in & Ors. Before Hon'ble Delhi High Court**

In continuation to Department of Telecommunications even no. letter dated 13.05.2022, kindly find the enclosed Hon'ble Delhi High Court orders dated 28<sup>th</sup> April, 2022 and 19<sup>th</sup> May 2022 in the subject matter court case C.S. (Comm) No. 275 of 2022, for compliance with respect to additional website (<https://unilever2.in/>), as provided by the counsel for the plaintiff with affidavit. DoT is defendant No. 18 in the case.

2. Hon'ble Court vide order dated 28<sup>th</sup> April, 2022 has, inter alia, directed that:

*27. Defendants No. 18 (DoT) and 19 (MEITY) are directed to issue Notifications calling upon the various internet and telecom service providers registered under them to block access to the various websites/Rogue Defendants identified by the Plaintiffs in the instant suit or such other websites that may subsequently be notified by the Plaintiffs to be infringing of its exclusive rights.*

3. Subsequently, Hon'ble Court vide order dated 19<sup>th</sup> May, 2022 has, inter alia, directed that:

*8. Needless to state that in case the Plaintiffs bring to the notice of Defendants No.18 and 19 any further violations by various websites/rogue Defendants, identified by the Plaintiffs, requisite action shall be taken by Defendants No. 18 and 19, in terms of para 27 of the order dated 28.04.2022.*

*10. Accordingly, names of Defendants No.18 and 19 are deleted from the array of parties.*

3. Accordingly, in view of the above, all the Internet Service licensees are hereby notified to take immediate necessary blocking action for compliance of the court order dated 28<sup>th</sup> April, 2022 and 19.05.2022 with respect to additional website <https://unilever2.in/> immediately.

Encl: A/A

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

\$~5

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

+ CS(COMM) 275/2022 & I.A. 6536/2022

HINDUSTAN UNILEVER LTD & ANR. .... Plaintiffs  
Through: Mr. Vivek Ayyagari, Mr. Angad S.  
Makkar and Ms. Ramya Aggarwal, Advocates.

versus

UNILEVERR1.IN & ORS. .... Defendants  
Through: Mr. Vaibhav Gaggar, Senior Panel  
Advocate with Mr. Vidur Mohan and Ms. Shefali  
Munde, Advocates for D-18 and 19.

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

**ORDER**

% **19.05.2022**

**I.A. 6535/2022** (under Order 39 Rules 1 and 2 CPC, by Plaintiffs)

1. Notice was issued to the Defendants through all permissible modes on 28.04.2022 and *dasti* in addition qua Defendants No. 9, 14, 20 and 21.
2. Affidavit of service has been filed on behalf of the Plaintiffs stating therein that Defendants No. 9, 14, 20 and 21 have been served. Proof of service is appended to the affidavit.
3. As per the Office Report, Defendants No. 11 and 14 are unserved and Defendants No. 13, 18 and 19 have been served by e-mail.
4. There is no appearance on behalf of the Defendants save and except Defendants No.18 and 19.
5. Issue fresh notice to the unserved Defendants, returnable before Court on 12.09.2022.

6. Mr. Vaibhav Gaggar, learned counsel enters appearance on behalf of Defendants No. 18 and 19 and submits that the directions issued by this Court in para 27 of the order dated 28.04.2022 have been duly complied with.

7. Learned counsel appearing on behalf of the Plaintiffs acknowledges the compliance of the directions of the Court by Defendants No. 18 and 19.

8. Needless to state that in case the Plaintiffs bring to the notice of Defendants No.18 and 19 any further violations by various websites/rogue Defendants, identified by the Plaintiffs, requisite action shall be taken by Defendants No. 18 and 19, in terms of para 27 of the order dated 28.04.2022.

9. Learned counsel for Defendants No.18 and 19 thus submits that the said Defendants may be deleted from the array of parties, since the directions passed by the Court have been complied with by them. There is no objection on behalf of the Plaintiffs to this extent.

10. Accordingly, names of Defendants No.18 and 19 are deleted from the array of parties.

11. There is no appearance on behalf of the served Defendants No. 9, 13, 14, 20 and 21.

12. In the interest of justice, adverse orders are deferred for today.

13. Learned counsel appearing on behalf of the Plaintiffs presses the reliefs claimed in the present application in paras (viii) and (ix) and draws the attention of the Court to similar orders passed in *HCL Technologies Ltd. & Anr. vs. Ajay Kumar & Ors.* in *CS(COMM) 466/2017*, *MCDONALDS Corporation and Anr. vs. National Internet Exchange of India and Ors.* in *CS(COMM) 324/2020* and *INDIAMART Intermesh Limited vs. Mr. Akash*

***Verma and Ors. in CS(COMM) 255/2020.***

14. Having heard the learned counsel for the Plaintiffs and having perused the orders relied upon, it is directed that Defendants No. 9 and 14 shall disclose the details of Defendants No. 2 to 4, (+91- 9945767310, +91- 8445343363 and +91- 9667036089) and suspend the said phone numbers.

15. It is further directed that Defendants No. 20 and 21 and all those acting on their behalf shall provide the registrant details/beneficiary details and details of bank accounts linked to UPI IDs (i.e., Defendant No.20 through the ID i.e., 9667036089@icici, and Defendant No. 21 through the ID lbikash8@axisbank) and shall also furnish KYC details and details of all transactions by/payments made in relation to the aforementioned IDs.

16. List on 12.09.2022.

17. Interim injunction granted *vide* order dated 28.04.2022 shall continue till the next date of hearing.

**CS(COMM) 275/2022**

18. In view of the order passed in I.A. 6535/2022, Defendants No. 18 and 19 are deleted from the array of parties.

19. Amended memo of parties be filed within two working weeks from today.

**I.A. 6536/2022 (seeking directions, by Plaintiffs)**

20. Issue notice to the Defendants, through all permissible modes, returnable on 12.09.2022.

**I.A. 6537/2022 (seeking directions, by Plaintiffs)**

21. Present application has been preferred on behalf of the Plaintiffs seeking following relief:-

*“Directing PhonePe Private Limited to provide the registrant*

*details / beneficiary details, and details of bank accounts and to provide details of all transactions by / payments made to the Rogue Defendants' UPI IDs, viz lbikash8@axisbank and 9667036089@icici, bearing Transaction IDs, T2203281721195664916567 and T2203281940395782666542 and file an Affidavit in this regard before the Hon'ble Court;"*

22. Having heard the learned counsel for the Plaintiffs, who also submits that the transaction details have been provided in the application with respect to the relief claimed, the prayer is allowed and directions are issued to PhonePe Private Limited to provide the registrant/beneficiary details and other details of the bank accounts as sought for in the aforesaid prayer.

23. Application stands disposed of.

24. Copy of the order shall be served by the Plaintiffs on Defendants No. 9, 14, 20 and 21 for necessary compliance of the directions in paras 14 and 15, respectively.

**JYOTI SINGH, J**

**MAY 19, 2022/sn**

\$~44

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

+ CS(COMM) 275/2022

HINDUSTAN UNILEVER LTD & ANR. .... Plaintiffs

Through: Mr. Saikrishna Rajagopal, Mr. Nitin  
Sharma, Mr. Vivek Ayyagari and Mr. Angad S.  
Makkar, Advocates.

versus

UNILEVERR1.IN & ORS. .... Defendants

Through:

**CORAM:**

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

**ORDER**

% **28.04.2022**

**I.A. 6540/2022 (Exemption)**

1. Subject to the Plaintiffs filing originals, clearer copies and documents with proper margins, which it may seek to place reliance on, within four weeks from today, exemption is granted.

2. Application is allowed and disposed of.

**I.A. 6539/2022 (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 it wishes 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. 6538/2022 (Exemption from issuing notice to Defendants No. 18 and 19)**

6. Since there is an urgency in the matter and the matter is being heard

today, Plaintiffs are exempted from serving the Defendants No. 18 and 19 with advance notice.

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

**I.A. 6536/2022 & 6537/2022 (Directions)**

8. List on 19.05.2022.

**CS(COMM) 275/2022**

9. Let plaint be registered as a suit.

10. Upon filing of process fee, issue summons to the Defendant, through all permissible modes, returnable on 28.07.2022. Summons shall state that the written statement shall be filed by the Defendant within 30 days from the receipt of summons. Along with the written statement, Defendant shall also file an affidavit of admission/denial of the documents of the Plaintiff.

11. Replication be filed by the Plaintiff within 15 days of the receipt of the written statement. Along with the replication, an affidavit of admission/denial of documents filed by the Defendant, shall be filed by the Plaintiff.

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

13. List before the learned Joint Registrar on 28.07.2022.

14. List before the Court on 19.05.2022.

**I.A. 6535/2022 (under Order 39 Rules 1 and 2 of CPC)**

15. Present application has been preferred by the Plaintiff under Order 39 Rules 1 and 2 read with Section 151 of the Code of Civil Procedure 1908 for grant of *ex-parte ad-interim* injunction.

16. Issue notice to the Defendants through all prescribed modes, returnable on 19.05.2022.

17. *Dasti* in addition to Defendants No. 9, 14, 20 and 21.

18. It is averred that Plaintiffs are popularly known, recognized and referred to, globally and in India, as 'Unilever', which word, apart from being a house mark, also forms a prominent, inseparable and integral part of their corporate names. Plaintiff No. 1 is a subsidiary of Plaintiff No.2. Plaintiff No. 2 is the owner of various trademarks including the



trademark 'Unilever' ("Unilever Logo") and has licensed the use of the same to Plaintiff No. 1 in India. Registrations for the Unilever logo





'Unilever'

and "Hindustan Unilever" obtained by the Plaintiffs have been detailed in para 18 of the plaint and are stated to be valid and subsisting. Plaintiffs have incurred significant expenditure on promotion of their products/services sold/provided under the Plaintiffs' Marks through advertisements and brand building, which for the year 2020-2021 is Rs.4,737/- Crores. The immense goodwill and reputation of the Plaintiff is evident from the tables incorporated in paras 24 and 25 of the plaint, which reflect not only the magnitude of the sales revenue and turnover but also the fact that Plaintiffs are continuing to grow rapidly.



19. It is averred that Defendants No. 1 to 5 are Rogue Defendants (hereinafter referred to as “Rogue Defendants”), who are offering jobs/programs for selling and marketing products of the Plaintiffs in return for monetary considerations, attracting unsuspecting members of the public by utilizing and/or using trademarks of the Plaintiffs herein. Information regarding such jobs is made available by the Rogue Defendants through Instagram ads, social media messaging apps and on the impugned domain name/Defendant No. 1, i.e. <https://unilever1.in/#/home>, which blatantly copies the house mark/trademark ‘UNILEVER’ in order to deceive and lure customers into believing that they have some association/affiliation with the Plaintiffs. Defendants No. 2, 3 and 4, as well as the Telegram Handle @nandanabhasin888 (Defendant No. 5) appear to be acting in concert with each other since the complaint which the Plaintiff had received refers to the interaction of the complainant with the said Defendants. A comparison of the mark used by Defendant No.1 with Plaintiffs’ mark, as brought out in the plaint, is as under:

<i>Plaintiff's Marks</i>	<i>Defendant No. 1 &amp; 5's/use of the Plaintiff's Marks in an identical manner</i>
	


20. It is averred that use of the Plaintiffs trademark ‘Unilever’ by the Defendant No. 1 as a part of its domain name as well as use of the Plaintiffs’

Unilever Logo, in an identical manner, is essentially to deceive the public at large. Rogue Defendants' use of the Plaintiffs' Unilever Logo, which is nearly identical to that of the Plaintiffs' Unilever Logo, constitutes infringement of the said trademark, passing off, dilution of the Plaintiffs' goodwill and unfair trade practice.

21. 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.

22. Accordingly, Defendants No. 1 to 5, 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 them, are restrained from using the impugned mark



“UNILEVERR” and the logo  etc. and/or any or any other mark identical/deceptively similar to the Plaintiffs' Unilever Logo/Hindustan Unilever trademark and/or any other mark associated with the Plaintiffs, in any manner amounting to infringement of Plaintiffs' trademarks, till the next date of hearing.

23. Defendants No. 1 to 5, 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 them, are further restrained from using the impugned mark “UNILEVERR” and the



logo and/or any other mark identical/deceptively similar to the Plaintiffs' Unilever Logo and trademark Hindustan Unilever/Plaintiffs' Marks in respect of domain name or any other manner amounting to passing off the Plaintiffs' goods/services, till the next date of hearing.

24. Defendants No. 1 to 5, 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 them, from, in any manner are further restrained from using directly or indirectly the Plaintiffs' Marks or any other mark identical/deceptively similar to the Plaintiffs' Marks, amounting to unfair competition, misappropriation, dilution and tarnishment, of the Plaintiffs' Marks, till the next date of hearing.

25. Defendant No. 7 (i.e., Namesilo.com/Domain Name Registrar), 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 suspend and block access to Defendant No. 1 (Rogue Website).

26. Defendants No. 8-17, 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 them, are directed to block access to the Rogue Website identified as Defendant No. 1 along with the instant suit.

27. Defendants No. 18 (DoT) and 19 (MEITY) are directed to issue Notifications calling upon the various internet and telecom service providers

registered under them to block access to the various websites/Rogue Defendants identified by the Plaintiffs in the instant suit or such other websites that may subsequently be notified by the Plaintiffs to be infringing of its exclusive rights.

28. Defendant No. 6 (Telegram – Social Media Intermediary) is directed to block/suspend fake account of Rogue Defendant No. 5 (i.e., @nanadanabasin888) as identified by the Plaintiffs now and/or at any subsequent time.

29. Plaintiffs shall comply with the provisions of Order 39 Rule 3 CPC within two weeks from today.

**JYOTI SINGH, J**

**APRIL 28, 2022/rk**

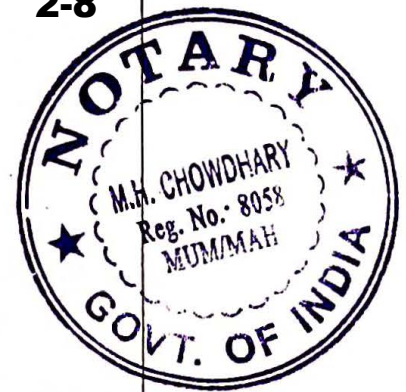
IN THE HIGH COURT OF DELHI AT NEW DELHI  
 (Ordinary Original Commercial Jurisdiction)  
 CS (COMM) NO. 275 OF 2022

**IN THE MATTER OF:**

Hindustan Unilever Limited & Anr. ...Plaintiffs  
*Versus*  
 unileverl.in & Ors. ...Defendants

INDEX

S. NO.	PARTICULARS	PAGE NO
1.	Affidavit of Ms. Vijayalakshmy Malkani dated 19 <sup>th</sup> July 2022 with respect to additional list of 1 URL / IP Address that is engaged in illegal and unauthorised adoption of the Plaintiffs' intellectual properties and infringement of the Plaintiffs' Rights	2-8
2.	Annexure A: Additional list of 1 URL / IP Address	9
3.	Evidence with respect to additional list of 1 URL / IP Address	10-11



*Vivek Ayyagari*  
 Vivek Ayyagari | Ramya Aggarwal  
 MAH4861/2016 / D/4428/2021

Place: New Delhi

Date: 19<sup>th</sup> July 2022

Saikrishna and Associates

Advocates for the Plaintiffs

+91 8017571175

v.ayyagari@saikrishnaassociates.com

**Note:** Proof of Service vide email dated 20.07.22 @Page 12. Concerned Parties have been served in advance.

IN THE HIGH COURT OF DELHI AT NEW DELHI

(*Ordinary Original Commercial Jurisdiction*)

CS (COMM) NO. 275 OF 2022

IN THE MATTER OF

Hindustan Unilever Limited & Anr.

...Plaintiffs

*Versus*

unileverl.in & Ors.

...Defendants

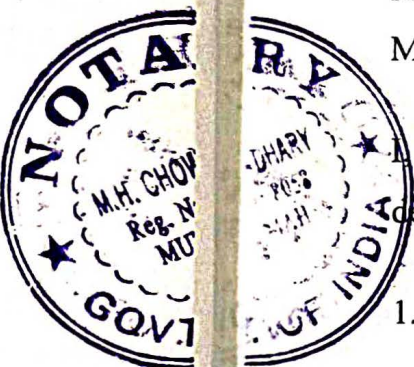
AFFIDAVIT OF MS. VIJAYALAKSHMY MALKANI, D/O KV NATRAJ, AGED ABOUT 48 YEARS, AUTHORIZED REPRESENTATIVE OF THE PLAINTIFF NO. 2, UNILEVER PLC, HAVING ITS OFFICE AT PORT SUNLIGHT, WIRRAL, MERSEYSIDE, CH62 4ZD ENGLAND, PRESENTLY AT MUMBAI, INDIA

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

1. That, I am the Authorized Representative of the Plaintiff No. 2 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.
2. I state that the Plaintiffs have filed the present suit in order to protect and enforce their exclusive rights in *inter alia* their registered trademarks, viz 'Hindustan Unilever', and 'HUL',



Unilever / the 'Unilever logo' and other intellectual properties, including trademark comprising of 'Unilever' ("the Plaintiffs' Rights"). Through their internal investigation and complaints received from aggrieved customers, the Plaintiffs had



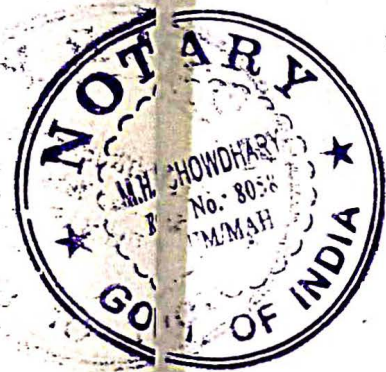
*[Handwritten signature]*

observed that numerous rogue defendants including a rogue website, impleaded as Defendant Nos. 1 – 5, illegally and unauthorisedly adopted the Plaintiffs' aforementioned intellectual properties for the purpose of deceiving members of the general public and trade by showing a false association between such rogue websites and the Plaintiffs, that of an agent, dealer, distributor and/or an employee of the Plaintiffs. The Plaintiffs noted that the said rogue website had blatantly copied the house mark/trademark 'UNILEVER' (as a part of its domain name).

3. I state that *vide* Order dated 28.04.2022 the Hon'ble Court was pleased to pass an *ex-parte ad-interim* Order in terms of the following:

*"21. 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.*

*22. Accordingly, Defendants No. 1 to 5, 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 them, are restrained from using the impugned mark "UNILEVERR" and the logo etc. and/or any or any other mark identical/deceptively similar to the Plaintiffs' Unilever Logo/Hindustan Unilever trademark and/or any other mark associated with the Plaintiffs, in any manner*

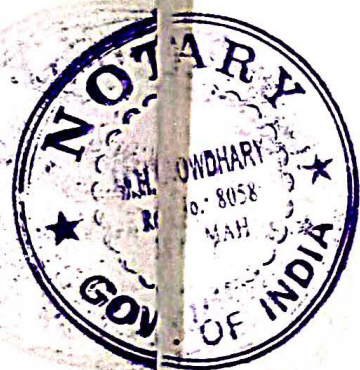


amounting to infringement of Plaintiffs' trademarks, till the next date of hearing.

23. Defendants No. 1 to 5, 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 them, are further restrained from using the impugned mark "UNILEVERR" and the logo and/or any other mark identical/deceptively similar to the Plaintiffs' Unilever Logo and trademark Hindustan Unilever/Plaintiffs' Marks in respect of domain name or any other manner amounting to passing off the Plaintiffs' goods/services, till the next date of hearing.

24. Defendants No. 1 to 5, 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 them, from, in any manner are further restrained from using directly or indirectly the Plaintiffs' Marks or any other mark identical/deceptively similar to the Plaintiffs' Marks, amounting to unfair competition, misappropriation, dilution and tarnishment, of the Plaintiffs' Marks, till the next date of hearing.

25. Defendant No. 7 (i.e., Namesilo.com/Domain Name Registrar), its directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or



A handwritten signature in black ink, appearing to be "A. S. S.", located at the bottom right of the page.



anyone claiming through, by or under it, are directed to suspend and block access to Defendant No. 1 (Rogue Website).

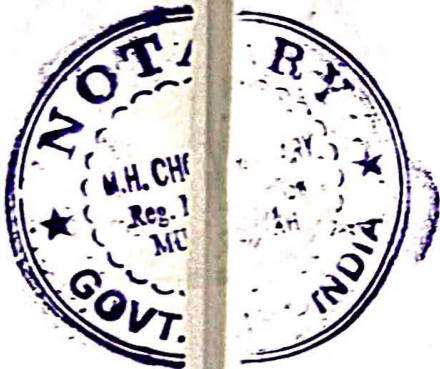
26. Defendants No. 8-17, their directors, partners, proprietors, officers, affiliates, servants, employees, and all others in capacity of principal or agent acting for and, on their behalf, or anyone claiming through, by or under them, are directed to block access to the Rogue Website identified as Defendant No. 1 along with the instant suit.

27. Defendants No. 18 (DoT) and 19 (MEITY) are directed to issue Notifications calling upon the various internet and telecom service providers registered under them to block access to the various websites/Rogue Defendants identified by the Plaintiffs in the instant suit or such other websites that may subsequently be notified by the Plaintiffs to be infringing of its exclusive rights.

28. Defendant No. 6 (Telegram – Social Media Intermediary) is directed to block/suspend fake account of Rogue Defendant No. 5 (i.e., @nanadanabasin888) as identified by the Plaintiffs now and/or at any subsequent time.”

4. Thereafter, I state that *vide* Order dated 19.05.2022 the Hon’ble Court was pleased to pass an order in terms of the following:

“8. Needless to state that in case the Plaintiffs bring to the notice of Defendants No.18 and 19 any further violations



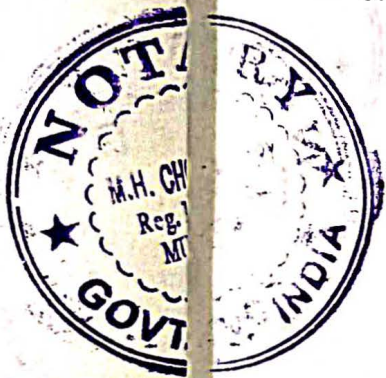
A handwritten signature in blue ink is located at the bottom right corner of the page.

by various websites/rogue Defendants, identified by the Plaintiffs, requisite action shall be taken by Defendants No. 18 and 19, in terms of para 27 of the order dated 28.04.2022."

5. Through further internal investigation, the following additional website has been identified by the Plaintiffs to be engaging in the aforementioned illegal and unauthorised activities and unduly impinging upon the Plaintiffs' Rights:

S. No.	Websites
1.	<a href="https://unileverr2.in/">https://unileverr2.in/</a>

6. I state that from the evidence filed along with the present Affidavit, evinces that the aforementioned website (i.e., <https://unileverr2.in/>) is an alphanumeric variation of the rogue website i.e., Defendant No. 1 ([unileverr1.in](https://unileverr1.in/)) against which the Hon'ble High Court of Delhi has already passed an *ex parte ad interim* Order dated 28<sup>th</sup> April 2022 and 19<sup>th</sup> May 2022 and it is also evident to note that the additional website (<https://unileverr2.in/>) is illegally and unauthorisedly adopting the Plaintiffs' aforementioned intellectual properties for the purpose of deceiving members of the general public and trade by showing a false association between said rogue website and the Plaintiffs. Similarly, to Defendant Nos. 1-5 in the instant suit, the above-mentioned website has, blatantly copied the house mark/trademark 'UNILEVER' (as a part of its domain name). Thus, the Plaintiffs also have reason to believe that one of the operators of the Defendant Nos. 1 – 5 is also the owner / is operating the above-mentioned website (*viz.*, <https://unileverr2.in/>) in order to carry on its illegal and



*[Handwritten signature]*

unauthorised activities, which amount to a blatant infringement of the Plaintiffs' Rights.

7. I state that the Plaintiffs are not aware of the owner(s) of this additional rogue website as either they are anonymous or have incorrect or incomplete addresses.

8. I state that the directions passed by this Hon'ble Court in its orders dated 28.04.2022 (para 27) and 19.05.2022 (para 8) (reproduced herein above) are also applicable to the aforementioned website (*viz.*, <https://unilever2.in/>).

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

10. 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.

11. 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 Plaintiff No. 1. 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 Plaintiff No. 2.
- 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.



*[Handwritten Signature]*

DEPONENT

VERIFICATION

Verified at Mumbai on this the 19<sup>th</sup> 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.

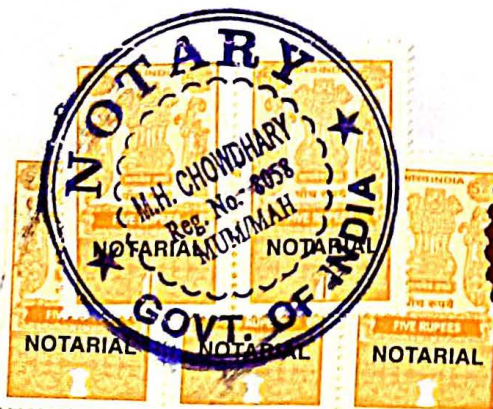
*[Handwritten Signature]*

DEPONENT

**BEFORE ME**

*[Handwritten Signature]*  
**M. H. CHOWDHARY**  
 PUBLIC NOTARY  
 (GOVT. OF INDIA)

19 JUL 2022



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

<b>S. NO.</b>	<b>WEBSITE</b>
1.	<a href="https://unileverr2.in/">https://unileverr2.in/</a>



Click to download the App



# Welcome Back

Quality Guarantee



Anne Klein

product description

5000.00



Emporio Arman

[VAGUE WATCH Co.]VAGUE WATC

2,740.50



Parmigiani Fleurier

Antoine



Service

Black Dial.

Wellington



5G Phone c-x

On Your Case

50000.00



Manufacturer warranty

ingredients

1114.52

Service

**Vivek**

---

**From:** Vivek <v.ayyagari@saikrishnaassociates.com>  
**Sent:** 20 July 2022 06:59  
**To:** 'HARENDRA HARENDRA'  
**Cc:** 'Rakesh Maheswari'; 'N Samaya Balan'; 'Cyber Law Legal'; 'vaibhav'; 'Tejpal Singh'; 'Sidharth Chopra'; nitin@saikrishnaassociates.com; angad@saikrishnaassociates.com; ramya@saikrishnaassociates.com  
**Subject:** RE: Hindustan Unilever Ltd & Anr. v. unileverr1.in & Ors., CS(COMM) 275/2022, I.A. 6535/2022  
**Attachments:** Amended Memo of Parties - HUL.pdf; Affidavit (Additional Website) - Plaintiff No. 2.pdf; Affidavit (Additional Website) - Plaintiff No. 1.pdf; HUL Order - 19.05.22 (1).pdf

RE: Hindustan Unilever Ltd & Anr. v. unileverr1.in & Ors., CS(COMM) 275/2022, I.A. 6535/2022 | Orders dated 28<sup>th</sup> April 2022 and 19<sup>th</sup> May 2022 passed by the High Court of Delhi

Dear Sir

We write further to your e-mail below dated 23<sup>rd</sup> June 2022 and on behalf of our Clients, **Hindustan Unilever Limited**, having its office at Unilever House, BD Savant Marg Chakala, Andheri (W), Mumbai, 400099 ("**Plaintiff No. 1**") and **Unilever PLC**, having its office at Port Sunlight, Wirral, Merseyside, CH62 4ZD England ("**Plaintiff No. 2**"), (Collectively "**Our Clients**").

As required, please find attached the Affidavits (on behalf of the Plaintiffs) dated 19<sup>th</sup> July 2022 with respect to additional list of 1 URL / IP Address, that is engaged in illegal and unauthorised adoption of the Plaintiffs' intellectual properties and infringement of the Plaintiffs' Rights. Please note that the said Affidavits shall be filed before the Hon'ble High Court of Delhi in the captioned matter.

You will recall that the above-mentioned matter came up before Hon'ble Ms. Justice Jyoti Singh, Delhi High Court on 19<sup>th</sup> May 2022. The Hon'ble Court was pleased to issue notice to you and was also pleased to pass an order in terms of the following:

*"8. Needless to state that in case the Plaintiffs bring to the notice of Defendants No.18 and 19 any further violations by various websites/roque Defendants, identified by the Plaintiffs, requisite action shall be taken by Defendants No. 18 and 19, in terms of para 27 of the order dated 28.04.2022."*

It is therefore submitted that *vide* order dated 19<sup>th</sup> May 2022, the Hon'ble Court has permitted Our Clients / Plaintiffs to approach you to seek blocking orders against additional websites found illegally violating Our Clients' rights.

Please note that the additional website '<https://unileverr2.in/>' that has been identified by Our Clients / Plaintiffs, is engaged in infringing Our Clients / Plaintiffs exclusive rights. The evidence against the website '<https://unileverr2.in/>' is also attached along with the Affidavits.

We therefore respectfully request you to pass blocking orders against this additional website i.e., <https://unileverr2.in/> and issue notification to all the ISPs as set forth in the Order of the Hon'ble Delhi High Court dated 28<sup>th</sup> April 2022 and 19<sup>th</sup> May 2022.

Copies of the orders dated 28<sup>th</sup> April 2022 and 19<sup>th</sup> May 2022 are attached herewith along with the amended memo of parties that have been filed in the captioned matter.

If you have any queries, please feel free to contact us.

Sincerely

Vivek Ayyagari



Counsel on behalf of the Plaintiffs

**Vivek Ayyagari | Senior Associate | Saikrishna & Associates, 57 Jor Bagh, Delhi 110003, India | [Tel:+91-11-40244360](tel:+91-11-40244360) (100Lines) | Handphone: +91-8017571175 | Enrolment No. – MAH/4861/2016**

**The Information contained in this e-mail and/or in any of the attached files constitutes confidential information of S&A and may also be the subject of legal professional privilege, not being waived or lost by mistaken transmission or receipt. If you have received this mail in error, please notify us at [info@saikrishnaassociates.com](mailto:info@saikrishnaassociates.com) immediately by reply email and destroy the original - any use, disclosure or copying of this mail is unauthorised.**

---

**From:** HARENDRA HARENDRA <[adetds2-dot@gov.in](mailto:adetds2-dot@gov.in)>

**Sent:** 23 June 2022 15:42

**To:** v.ayyagari@saikrishnaassociates.com

**Cc:** Rakesh Maheswari <[gccyberlaw@meity.gov.in](mailto:gccyberlaw@meity.gov.in)>; N Samaya Balan <[ns.balan@meity.gov.in](mailto:ns.balan@meity.gov.in)>; Cyber Law Legal <[cyberlaw-legal@meity.gov.in](mailto:cyberlaw-legal@meity.gov.in)>; vaibhav <[vai\*\*b\*\*hav@gaggarpartners.com](mailto:vai<b>b</b>hav@gaggarpartners.com)>; Tejpal Singh <[dirds2-dot@nic.in](mailto:dirds2-dot@nic.in)>; [nitin@saikrishnaassociates.com](mailto:nitin@saikrishnaassociates.com); [angad@saikrishnaassociates.com](mailto:angad@saikrishnaassociates.com); [ramya@saikrishnaassociates.com](mailto:ramya@saikrishnaassociates.com)

**Subject:** Hindustan Unilever Ltd & Anr. v. unilever1.in & Ors., CS(COMM) 275/2022, I.A. 6535/2022

Sir,

With respect to trailing email it is to state that:

*“DoT has no mechanism to check the veracity of submission made by the counsel for the Plaintiff. Therefore, it is requested to submit the additional list of such websites through an affidavit and on receipt of the same DoT may issue necessary notification in compliance to court order if required. Further, amended memo of parties may be provided as vide order dated 19-05-2022 Defendants No.18 has been removed from array of parties for record please.”*

This issued with the approval of DDG(DS).

With Regards,

ADET(DS-II), Data Services Cell,  
Sanchar Bhawan, DOT HQ,  
New Delhi-110001

---

**From:** "Tejpal Singh" <[dirds2-dot@nic.in](mailto:dirds2-dot@nic.in)>

**To:** "HARENDRA HARENDRA" <[adetds2-dot@gov.in](mailto:adetds2-dot@gov.in)>

**Sent:** Wednesday, June 22, 2022 3:18:21 PM

**Subject:** Fwd: Hindustan Unilever Ltd & Anr. v. unilever1.in & Ors., CS(COMM) 275/2022, I.A. 6535/2022

Please examine

With Regards,  
Tejpal Singh  
Director (DS-II) , Department of Telecom  
Ministry Of Communications  
Phone: 011-2303 6860