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: 21.03.2023

To,

All Internet Service Licensee's

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

Kindly find the enclosed Hon'ble Delhi High Court order dated 06.04.2022, and 85th additional Affidavit dated 17.03.2023 on the subject matter.

- 2. Please refer to **para 31(n)** of said court order in respect para 9 of aforesaid affidavit and blocking of **10 websites** as enumerated in **para 3 and Annexure A** of the affidavit.
- 3. Accordingly, in view of the above, all the Internet Service licensees are hereby instructed to take immediate necessary blocking action for compliance of the request in the affidavit as above in view of the said court order.

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

Encl: A/A

Copy to:

- (i) Sh. V.Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi (Respondent no. 33) for kind information and necessary action.
- (ii) Sh. Angad Makkar, (angad@saikrishnaassociates.com) Associate, Saikrishna & Associates, counsel for the Plaintiff for kind information.
- (iii) IT wing of DoT for uploading on DoT website please.

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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 06.04.2022

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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;

- 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** have 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 (apkmole.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-kytety.lalalalalalori.workers.dev);
- 1. 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

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 Saikrishna and Associates
Date: 17th March 2023 Advocates for the Plaintiffs

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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 29 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:

- 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.
- 2. I state that I am aware of the present suit and the order dated

Q6.04.2022 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

Debajyoti Bebuhia Advocate Regn. No. 19718 Period: 24/02/2020 to 24/02/2025 Central Delhi

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 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

Debajyoti Be Oria Advosate Regn. No. 13716 Period: 24/02/2020 to 24/02/2025 Central Delhi 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 (apkmole.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);

Debelyoti Behulov Advocate Regn. No. 19716 Periodi 24/62/2020 to 24/02/2025 Central Delhi 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

Debalyoti Bouria Advocatu Regn. No. 19716 Period: 24/02/2020 to 24/02/2025 Central Delhi 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.lalalalalalori.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

Debajyoti Behuss
Advocate
Regn. No. 19716
Period: 24/02/2020
Period: 24/02/2025
to 24/02/2025
Central Dethi

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 third-party websites (in terms of para 31(b) of the aforementioned order dated 06.04.2022) which serve as a repository of .APK files that provide access to users of rogue Android-based mobile Apps (such as the Defendant Nos. 1 to 6), and gather evidence of their infringing activity. I state that the following 10 websites have been identified by the investigation agency which are intricately involved and seem to have a common design with the creators / developers of the Rogue Apps in infringing and/or authorising the infringement of Plaintiffs' exclusive rights in

made available through the Plaintiffs' STAR Channels:

S. No.	Rogue Websites
1.	apkasset.com
2.	apkcima.com
3.	apkliker.net

4.	apkmart.net
5.	apkpot.com
6.	apkshelf.com
7.	m.apkpure.com
8.	moddator.com
9.	streamindiaapkpro.com
10.	techaccents.net

4. I state that the from the evidence filed along with the present Affidavit, it is evident that the above-mentioned websites are infringing and/or authorising infringement of the Plaintiffs' exclusive rights in the Plaintiffs' Content, including but not limited to the content made available through the Plaintiffs' STAR Channels. 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 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, by making available for

download and usage the Rogue Apps (i.e., Defendant Nos. 1 to

6, and other rogue Apps notified by the Plaintiffs subsequently

on Affidavit).

I state that the evidence filed herewith also shows that the business model and primary purpose of the websites identified

Debajyoti Bendria Advocato Regn. No. 19716 Period: 24/02/2020 to 24/02/2025 Central Delhi herein is to (a) provide a repository of such rogue mobile Apps, including the Rogue Apps (i.e., Defendant Nos. 1 to 6, and other rogue Apps notified by the Plaintiffs on Affidavit), which are not allowed to be listed on App Stores like Google App store, ostensibly due to violation of their policies (which could include policies related to intellectual property), thereby circumventing the specific security limitations and prohibitions put in place by such App stores, and/or (b) to provide access to Mod APKs for official Android-based mobile Apps (like the Disney+ Hotstar App) so that the user does not have to make any payments for subscription or upgradation or in-app purchases that would otherwise be required in the official mobile Apps.

6. I further state that a perusal of the evidence filed herewith clearly evinces that these aforesaid 10 websites are rogue in nature, as the .APK files being distributed and promoted on the aforementioned websites have no non-infringing use / utility

and as such, these websites are solely instruments / vehicles of

infringement which authorise, actively facilitate and materially

contribute to the infringement of the Plaintiffs' copyright and

broadcast reproduction rights through inter alia the myriad

Rogue Apps impleaded in the instant suit as Defendant Nos. 1

to 6. It is submitted that from the evidence filed herewith, it is evident that the said 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., which are indulging in the illicit business of communicating / making available infringing content.

- 7. I further state that the Plaintiffs are not aware of the owner(s) of these rogue websites as either they are anonymous or have incorrect or incomplete addresses.
- 8. I state that in terms of the following directions passed by this Hon'ble Court, *vide* order dated 16.04.2021, *ex parte adinterim* order dated 06.04.2022 (reproduced herein above) is also applicable on the above mentioned 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

Debajyoti Beniria Advocate Rego. No. 19716 Period: 24/02/2020 to 24/02/2025 Central Delhi 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."

- 9. In light of the abovementioned, the Department of Telecommunications (Defendant No. 32) and the Ministry of Electronics and Information Technology (Defendant No. 33) are urged to issue a notification to the Internet Service Providers (Defendant Nos. 23 31) to block the additional rogue websites / UI domains identified in Annexure A hereto.
- 10.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.

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.

12.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.

an exact replica and has been produced from the original electronic record and therefore, reproduces the information contained on the electronic records therein.

DEPONENT

VERIFICATION

Verified at New Delhi on this the __day of March 2023 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.

DEPONENT

e deponent who use signed in my presence.

Debajyoti Bel Regn. No. 19716 Period: 24/02/2020

to 24/02/2025

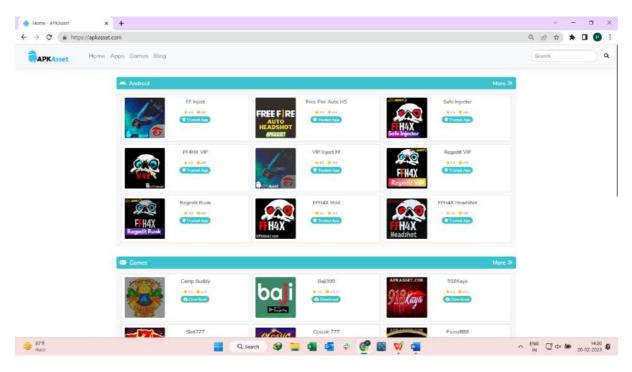
That the content of the afficient which have been read & explained to him/her are true & correct to his/her knowledge

ANNEXURE A: LIST OF DOMAINS / URLs / IP ADDRESSES

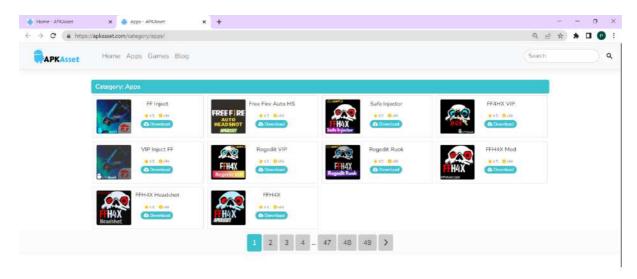
S. NO.	DOMAINS / WEBSITES	19
1.	apkasset.com	
2.	apkcima.com	
3.	apkliker.net	
4.	apkmart.net	
5.	apkpot.com	
6.	apkshelf.com	
7.	m.apkpure.com	
8.	moddator.com	
9.	streamindiaapkpro.com	
10.	techaccents.net	

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKASSET.COM

HOME PAGE



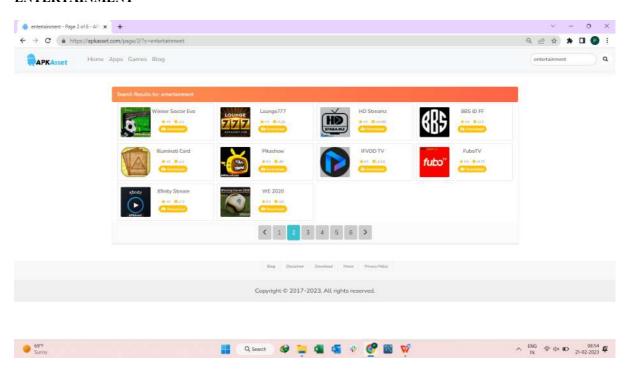
CATEGORIES





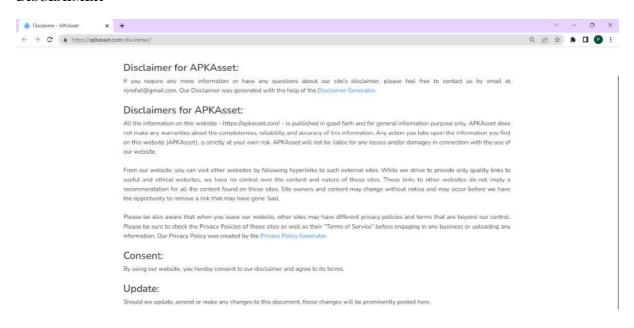
^ ENG ☐ d× to 15:35 €

ENTERTAINMENT



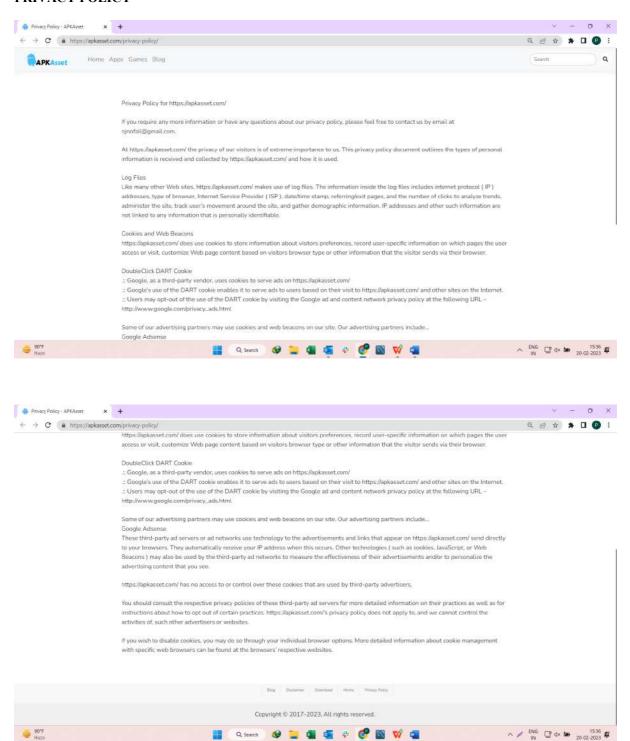
DISCLAIMER

⊕ 90°F Haze



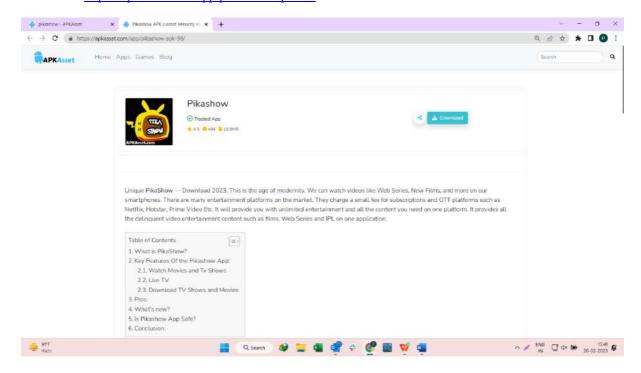
🔡 Q Search 🚱 📜 💁 🌠 💠 🧬 🚳 🥡 👊

PRIVACY POLICY



ROGUE APPS AVAILABLE ON THE WEBSITE APKASSET.COM

Pikashow: https://apkasset.com/app/pikashow-apk-98/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP Good Luck Jerry



2/20/23, 5:40 PM Whois apkasset.com **21**



Enter Domain or IP

WHOIS

DOMAINS

WEBSITE

CLOUD

ns2.symbolhost.com

HOSTING

SERVERS

EMAIL

SECURITY

WHOIS

SUPPORT

LOGIN

0

apkasset.com

Domain I	Domain Information	
Domain:	apkasset.com	
Registrar:	NameCheap, Inc.	
Registered On:	2021-06-21	
Expires On:	2023-06-21	
Updated On:	2023-01-14	
Status:	ok	
Name Servers:	ns1.symbolhost.com	

Updated 12 days ago 🗸 Interested in similar domains?

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3apkasset.com	Buy Now
apkassetmanagement.c om	Buy Now
pksasset.com	Buy Now
apkasset.net	Buy Now

Buy Now

Registrant Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	e1ceda8c633b4023b5af550741563cab.protect @withheldforprivacy.com

.space

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V	VORDPRESS HOSTING
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Administrative Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	e1ceda8c633b4023b5af550741563cab.protect @withheldforprivacy.com

Technical Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2

2/20/23, 5:40 PM Whois apkasset.com **21**

City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	e1ceda8c633b4023b5af550741563cab.protect @withheldforprivacy.com

```
Raw Whois Data
Domain name: apkasset.com
Registry Domain ID: 2621176949_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.namecheap.com
Registrar URL: http://www.namecheap.com
Updated Date: 2022-06-19T14:50:03.21Z
Creation Date: 2021-06-21T10:41:58.00Z
Registrar Registration Expiration Date: 2023-06-21T10:41:58.00Z
Registrar: NAMECHEAP INC
Registrar IANA ID: 1068
Registrar Abuse Contact Email: abuse@namecheap.com
Registrar Abuse Contact Phone: +1.9854014545
Reseller: NAMECHEAP INC
Domain Status: ok https://icann.org/epp#ok
Registry Registrant ID:
Registrant Name: Redacted for Privacy
Registrant Organization: Privacy service provided by Withheld for Privacy ehf
Registrant Street: Kalkofnsvegur 2
Registrant City: Reykjavik
Registrant State/Province: Capital Region
Registrant Postal Code: 101
Registrant Country: IS
Registrant Phone: +354.4212434
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: e1ceda8c633b4023b5af550741563cab.protect@withheldforprivacy.com
Registry Admin ID:
Admin Name: Redacted for Privacy
Admin Organization: Privacy service provided by Withheld for Privacy ehf
Admin Street: Kalkofnsvegur 2
Admin City: Reykjavik
Admin State/Province: Capital Region
Admin Postal Code: 101
Admin Country: IS
Admin Phone: +354.4212434
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
\label{protect} \mbox{Admin Email: } \textbf{e1ceda8c633b4023b5af550741563cab.protect} @ \mbox{withheldforprivacy.com} \\
Registry Tech ID:
Tech Name: Redacted for Privacy
Tech Organization: Privacy service provided by Withheld for Privacy ehf
Tech Street: Kalkofnsvegur 2
Tech City: Reykjavik
Tech State/Province: Capital Region
Tech Postal Code: 101
Tech Country: IS
Tech Phone: +354.4212434
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: e1ceda8c633b4023b5af550741563cab.protect@withheldforprivacy.com
Name Server: ns1.symbolhost.com
Name Server: ns2.symbolhost.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-02-07T01:26:31.18Z <<<
For more information on Whois status codes, please visit https://icann.org/epp
```

related domain names

namecheap.com icann.org symbolhost.com withheldforprivacy.com internic.net



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Contact Support

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AAGRIEKSCIARIO

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021467] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkasset.com]

1 message

hotstar_enforcement@markscan.in < hotstar_enforcement@markscan.in >

Mon, Feb 20, 2023 at 2:32

To: njnofail@gmail.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work **Properties of HotStar and Hotstar.** In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to **Properties of HotStar and Hotstar** being illegally made available on your website:

https://apkasset.com/app/pikashow-apk-98/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

Star House, Urmi Estate,

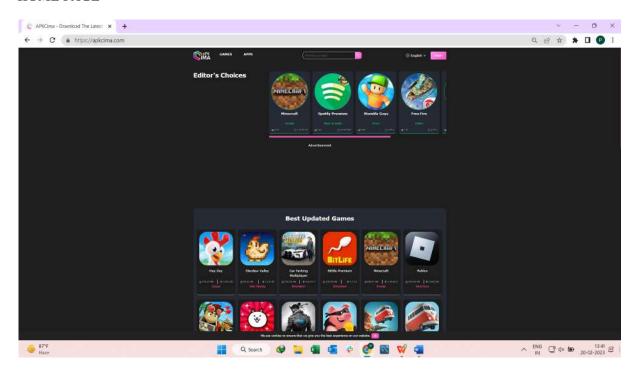
95, Ganpatrao Kadam Marg,

Lower Parel (W), Mumbai- 400013

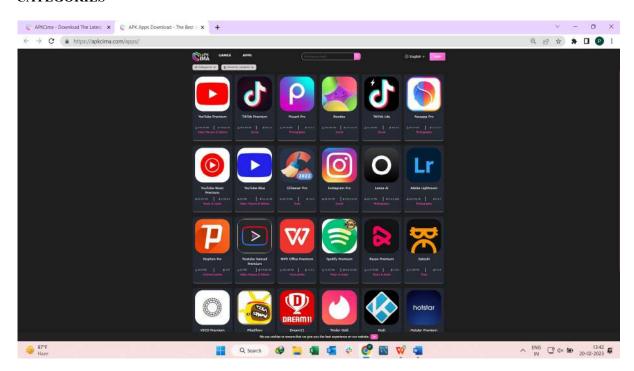
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKCIMA.COM

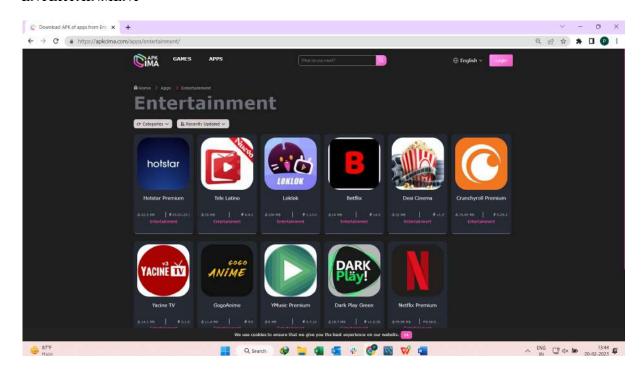
HOME PAGE



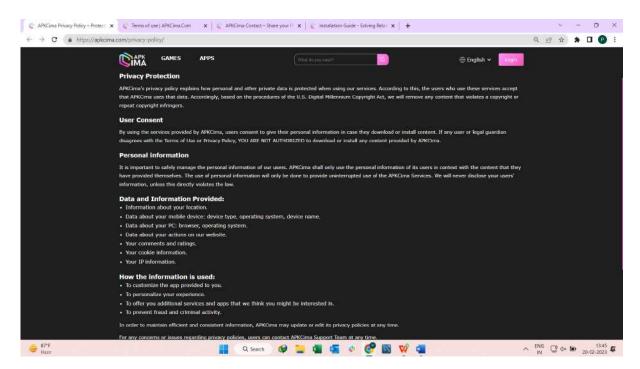
CATEGORIES



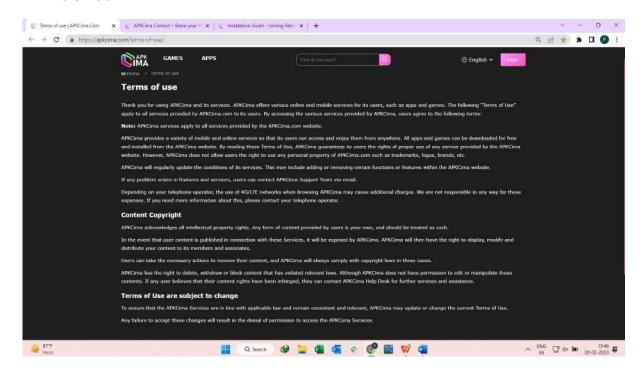
ENTERTAINMENT



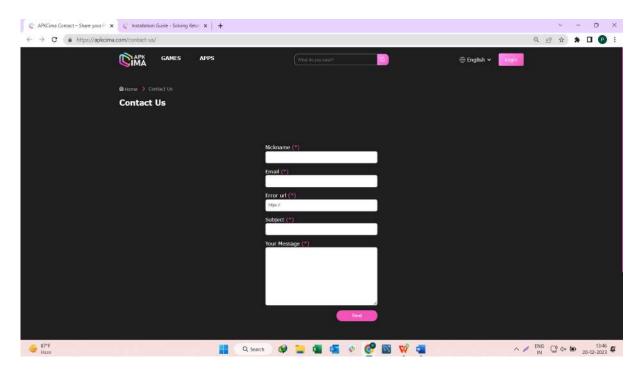
PRIVACY POLICY



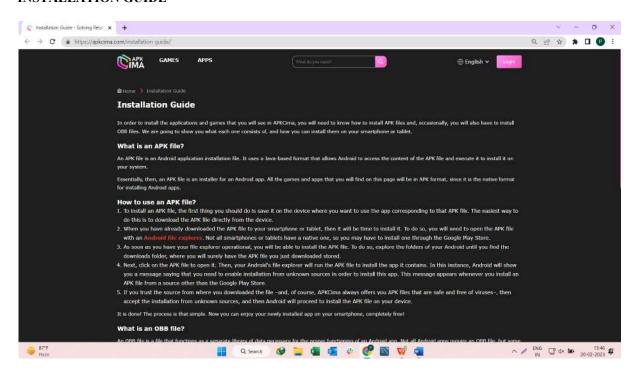
TERMS OF USE

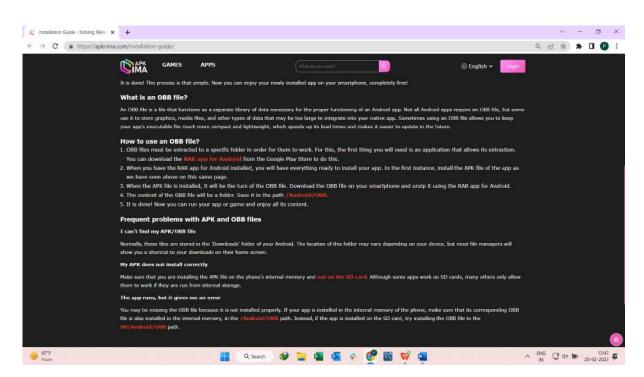


CONTACT US



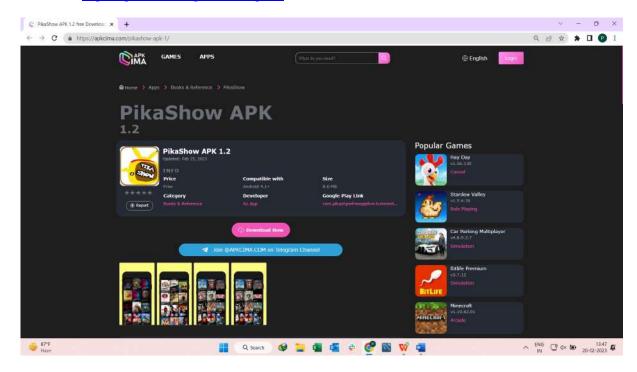
INSTALLATION GUIDE





ROGUE APPS AVAILABLE ON THE WEBSITE APKCIMA.COM

Pikashow: https://apkcima.com/pikashow-apk-1/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Good Luck Jerry



2/20/23, 5:39 PM Whois apkcima.com **31**



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Domain:	apkcima.com
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Registered On:	2022-01-06
Expires On:	2024-01-06
Updated On:	2022-12-26
Status:	clientTransferProhibited
Name Servers:	bella.ns.cloudflare.com nero.ns.cloudflare.com

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City:	Reykjavik
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Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	5ce24bb25bc1460c9b9c95f79a2115df.protect @withheldforprivacy.com

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Country:	IS
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	WORDPRES	5
	HOSTING	
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Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2

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State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	5ce24bb25bc1460c9b9c95f79a2115df.protect @withheldforprivacy.com

```
Raw Whois Data
Domain name: apkcima.com
Registry Domain ID: 2666325539_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.namecheap.com
Registrar URL: http://www.namecheap.com
Updated Date: 2022-12-26T03:10:06.70Z
Creation Date: 2022-01-06T03:54:59.00Z
Registrar Registration Expiration Date: 2024-01-06T03:54:59.00Z
Registrar: NAMECHEAP INC
Registrar IANA ID: 1068
Registrar Abuse Contact Email: abuse@namecheap.com
Registrar Abuse Contact Phone: +1.9854014545
Reseller: NAMECHEAP INC
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi
Registry Registrant ID:
Registrant Name: Redacted for Privacy
Registrant Organization: Privacy service provided by Withheld for Privacy ehf
Registrant Street: Kalkofnsvegur 2
Registrant City: Reykjavik
Registrant State/Province: Capital Region
Registrant Postal Code: 101
Registrant Country: IS
Registrant Phone: +354.4212434
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 5ce24bb25bc1460c9b9c95f79a2115df.protect@withheldforprivacy.com
Registry Admin ID:
Admin Name: Redacted for Privacy
Admin Organization: Privacy service provided by Withheld for Privacy ehf
Admin Street: Kalkofnsvegur 2
Admin City: Reykjavik
Admin State/Province: Capital Region
Admin Postal Code: 101
Admin Country: IS
Admin Phone: +354.4212434
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
\label{protect} \mbox{Admin Email: } \mbox{\bf 5ce24bb25bc1460c9b9c95f79a2115df.protect@withheldforprivacy.com}
Registry Tech ID:
Tech Name: Redacted for Privacy
Tech Organization: Privacy service provided by Withheld for Privacy ehf
Tech Street: Kalkofnsvegur 2
Tech City: Reykjavik
Tech State/Province: Capital Region
Tech Postal Code: 101
Tech Country: IS
Tech Phone: +354.4212434
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: 5ce24bb25bc1460c9b9c95f79a2115df.protect@withheldforprivacy.com
Name Server: bella.ns.cloudflare.com
Name Server: nero.ns.cloudflare.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-02-20T03:09:30.45Z <<<
For more information on Whois status codes, please visit https://icann.org/epp
```

related domain names

namecheap.com icann.org cloudflare.com withheldforprivacy.com internic.net

2/20/23, 5:39 PM Whois apkcima.com



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Transfer Domain Name Windows Hosting

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Name Suggestion Tool Free with Every Domain

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Linux Reseller Hosting Windows Reseller Hosting

Dedicated Servers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

Infrastructure

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

Support

View Knowledge Base

Contact Support

Report Abuse

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Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021466] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkcima.com]

1 message

hotstar_enforcement@markscan.in < hotstar_enforcement@markscan.in >

Mon, Feb 20, 2023 at 2:32

To: apkcima@gmail.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work **Properties of HotStar and Hotstar.** In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to **Properties of HotStar and Hotstar** being illegally made available on your website:

https://apkcima.com/pikashow-apk-1/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

Star House, Urmi Estate,

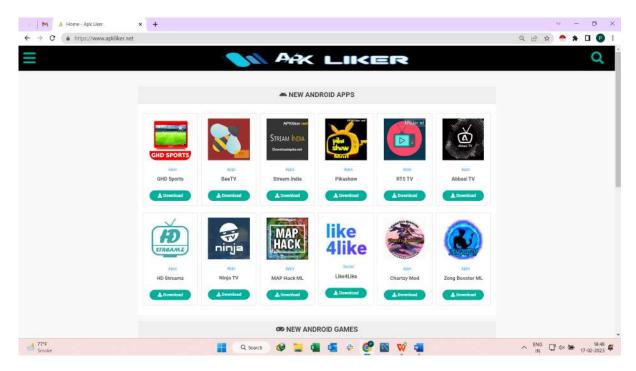
95, Ganpatrao Kadam Marg,

Lower Parel (W), Mumbai- 400013

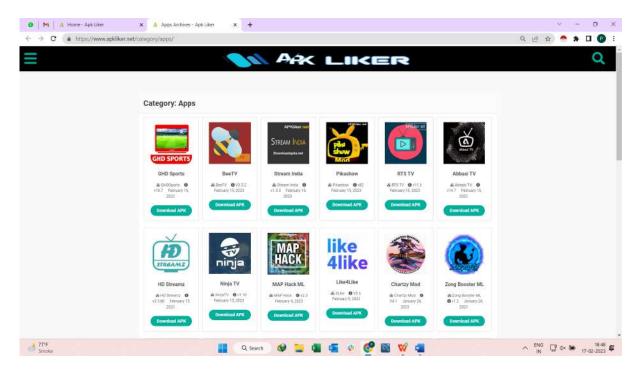
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKLIKER.NET

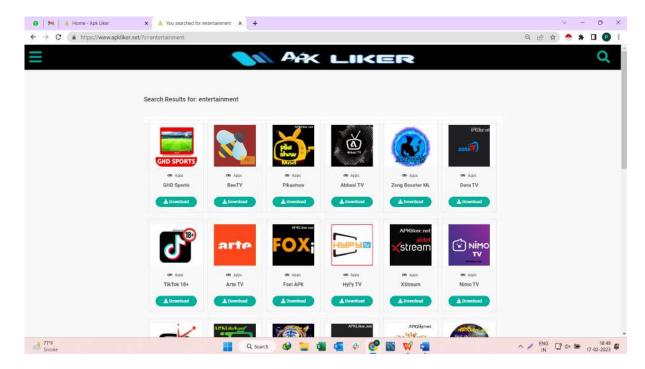
HOMEPAGE



CATEGORY

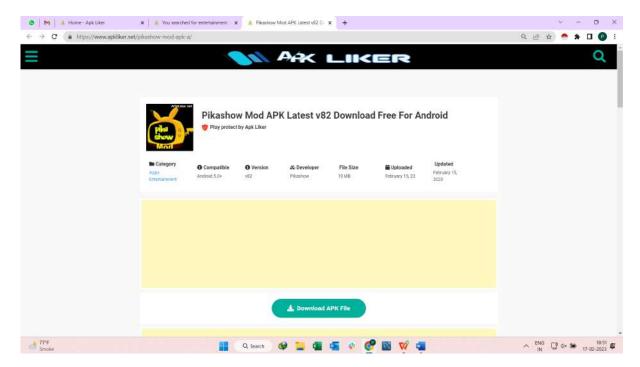


ENTERTAINMENT

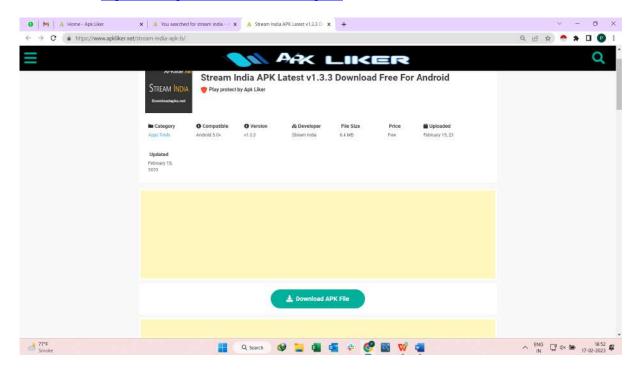


ROGUE APPS AVAILABLE ON THE WEBSITE APKLIKER.NET

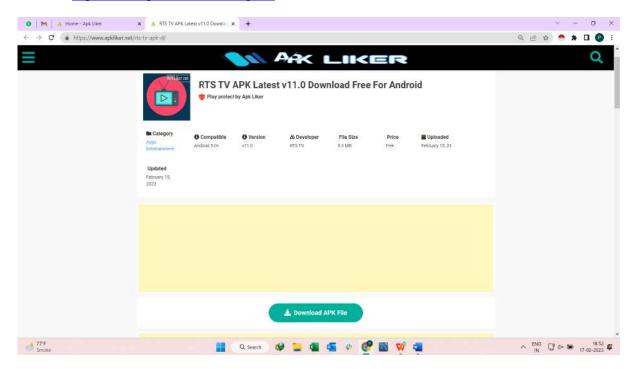
Pikashow: https://www.apkliker.net/pikashow-mod-apk-a/



Stream India: https://www.apkliker.net/stream-india-apk-b/



RTS TV: https://www.apkliker.net/rts-tv-apk-d/

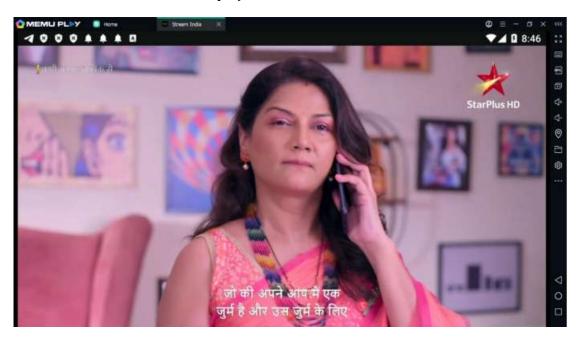


INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Pikashow – Good Luck Jerry



Stream India - Kabhi Kabhie Ittefaq Sey



RTS TV



ork, clear the app data or uninstall the app and rein Similar Channels



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Domain Information	
Domain:	apkliker.net
Registrar:	PDR Ltd. d/b/a PublicDomainRegistry.com
Registered On:	2017-02-24
Expires On:	2023-02-24
Updated On:	2022-02-23
Status:	clientTransferProhibited
Name Servers:	dorthy.ns.cloudflare.com kianchau.ns.cloudflare.com

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apklikergames.com	Buy Now
downloadliker.com	Buy Now
apklikesr.net	Buy Now

Registra	Registrant Contact	
Name:	Amin Jan	
Street:	Village silpi, Tehsil ponial, Dist Ghizer, GB	
City:	Gahkuch	
State:	Pakistan	
Postal Code:	15200	
Country:	PK	
Phone:	+92.03129700670	
Email:	jananin338@gmail.com	

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Administrative Contact	
Name:	Amin Jan
Street:	Village silpi, Tehsil ponial, Dist Ghizer, GB
City:	Gahkuch
State:	Pakistan
Postal Code:	15200
Country:	PK
Phone:	+92.03129700670
Email:	jananin338@gmail.com

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Technical Contact

Name:	Amin Jan
Street:	Village silpi, Tehsil ponial, Dist Ghizer, GB
City:	Gahkuch

43

```
State: Pakistan

Postal Code: 15200

Country: PK

Phone: +92.03129700670

Email: jananin338@gmail.com
```

Raw Whois Data Domain Name: APKLIKER.NET Registry Domain ID: 2100329309_DOMAIN_NET-VRSN Registrar WHOIS Server: whois.publicdomainregistry.com Registrar URL: www.publicdomainregistry.com Updated Date: 2022-02-23T14:53:51Z Creation Date: 2017-02-24T20:37:46Z Registrar Registration Expiration Date: 2023-02-24T20:37:46Z Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com Registrar IANA ID: 303 Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi Registry Registrant ID: Not Available From Registry Registrant Name: Amin Jan Registrant Organization: Registrant Street: Village silpi, Tehsil ponial, Dist Ghizer, GB Registrant City: Gahkuch Registrant State/Province: Pakistan Registrant Postal Code: 15200 Registrant Country: PK Registrant Phone: +92.03129700670 Registrant Phone Ext: Registrant Fax: Registrant Fax Ext: Registrant Email: janamin338@gmail.com Registry Admin ID: Not Available From Registry Admin Name: Amin Jan Admin Organization: Admin Street: Village silpi, Tehsil ponial, Dist Ghizer, GB Admin City: Gahkuch Admin State/Province: Pakistan Admin Postal Code: 15200 Admin Country: PK Admin Phone: +92.03129700670 Admin Phone Ext: Admin Fax: Admin Fax Ext: Admin Email: jananin338@gmail.com Registry Tech ID: Not Available From Registry Tech Name: Amin Jan Tech Organization: Tech Street: Village silpi, Tehsil ponial, Dist Ghizer, GB Tech City: Gahkuch Tech State/Province: Pakistan Tech Postal Code: 15200 Tech Country: PK Tech Phone: +92.03129700670 Tech Phone Ext: Tech Fax: Tech Fax Ext: Tech Email: janamin338@gmail.com Name Server: dorthy.ns.cloudflare.com Name Server: kianchau.ns.cloudflare.com DNSSEC: Unsigned Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com Registrar Abuse Contact Phone: +1.2013775952 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/ >>> Last update of WHOIS database: 2023-02-20T12:08:54Z <<<

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

Registration Service Provided By: DOMAIN.PK

The data in this whois database is provided to you for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. We make this information available "as is", and do not guarantee its accuracy. By submitting a whois query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- $(1) \ \ enable \ high \ volume, \ automated, \ electronic \ processes \ that \ stress \ or \ load \ this \ whois \ database \ system \ providing \ you \ this \ information; \ or$
- (2) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or

2/20/23, 5:38 PM Whois apkliker.net

44

by telephone.

The compilation, repackaging, dissemination or other use of this data is expressly prohibited without prior written consent from us. The Registrar of record is PDR Ltd. d/b/a PublicDomainRegistry.com.
We reserve the right to modify these terms at any time.
By submitting this query, you agree to abide by these terms.

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Domain Offers

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Windows Reseller Hosting

Dedicated Servers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

Infrastructure

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

Support

View Knowledge Base

Contact Support

Report Abuse

About Whois

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https://www.whois.com/whois/apkliker.net

AGENT IS SQUARE

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021459] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkliker.net]

1 message

hotstar_enforcement@markscan.in <hotstar_enforcement@markscan.in>

Mon, Feb 20, 2023 at 2:32

To: janamin338@gmail.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work Properties of HotStar and Hotstar. In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to Properties of HotStar and Hotstar being illegally made available on your website:

https://www.apkliker.net/rts-tv-apk-d/

https://www.apkliker.net/stream-india-apk-b/ https://www.apkliker.net/pikashow-mod-apk-a/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

Star House, Urmi Estate,

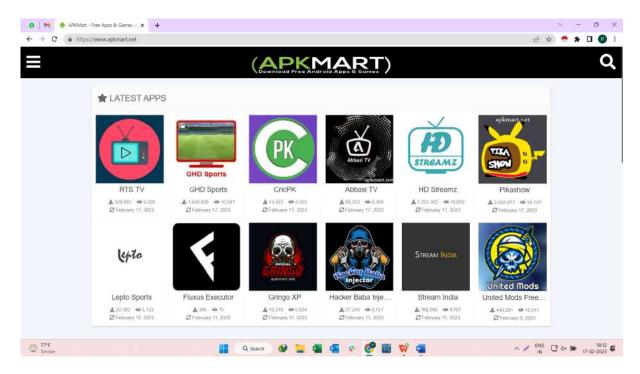
95, Ganpatrao Kadam Marg,

Lower Parel (W), Mumbai- 400013

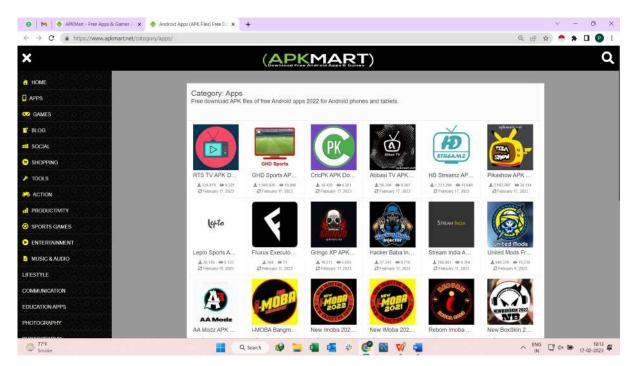
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKMART.NET

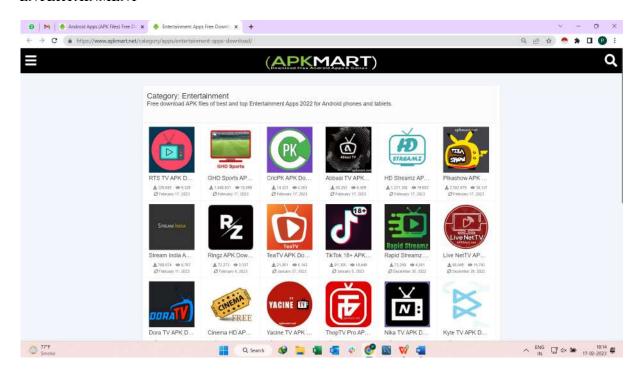
HOME PAGE



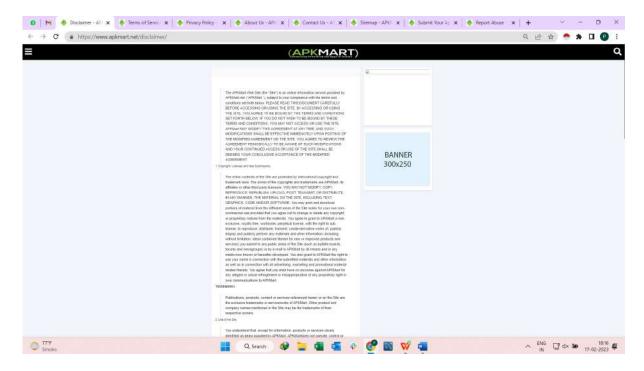
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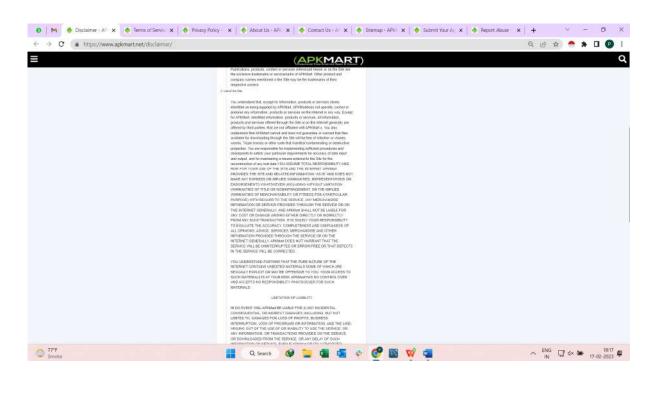


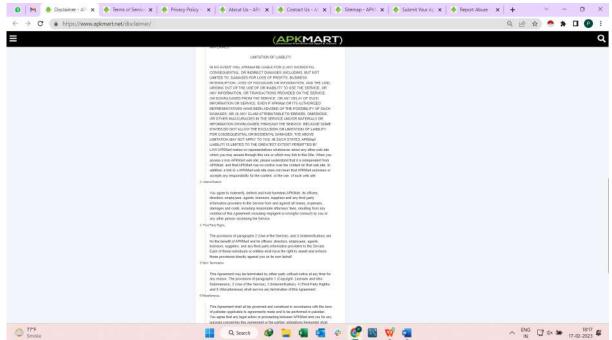
ENTERTAINMENT



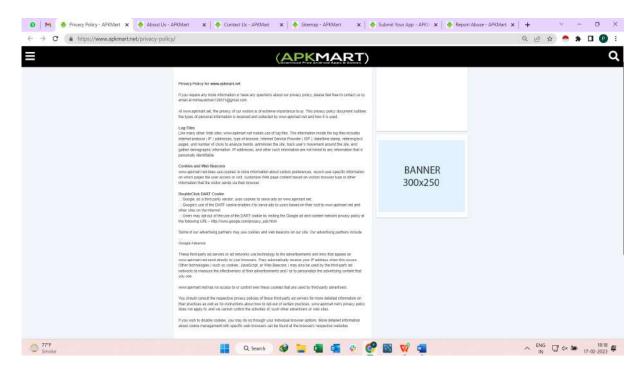
DISCLAIMER



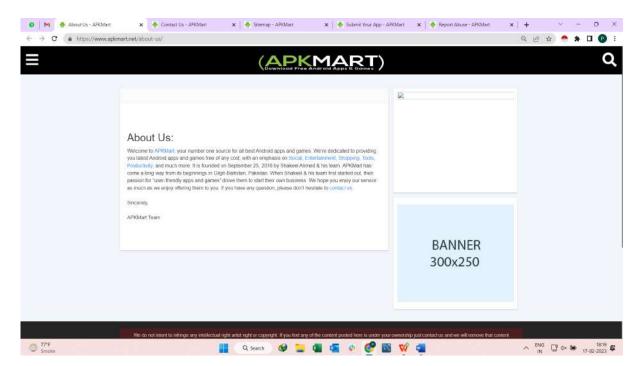




PRIVACY POLICY

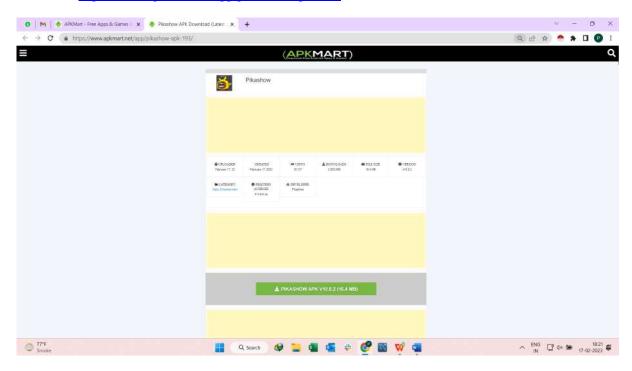


ABOUT US

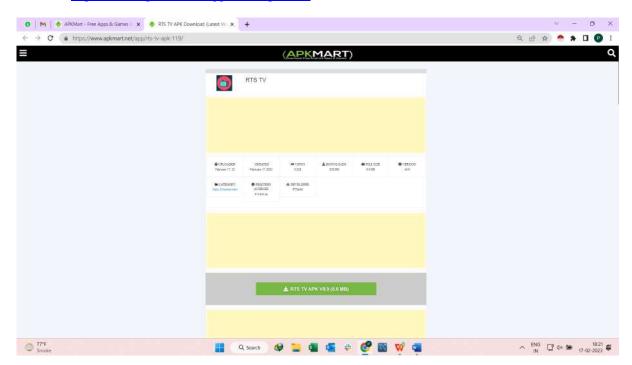


ROGUE APPS AVAILABLE ON THE WEBSITE APKMART.NET

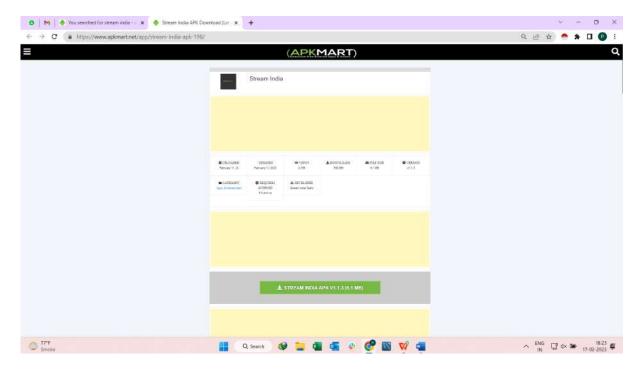
Pikashow: https://www.apkmart.net/app/pikashow-apk-193/



RTS TV: https://www.apkmart.net/app/rts-tv-apk-119/



Stream India: https://www.apkmart.net/app/stream-india-apk-198/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Pikashow - Good Luck Jerry



RTS TV - Anupamaa



ork, clear the app data or uninstall the app and rein Similar Channels



Stream India - Kabhi Kabhie Ittefaq Sey



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56



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Domain Information		da _l
Domain:	apkmart.net	apl
Registrar:	GoDaddy.com, LLC	арі
Registered On:	2018-09-25	apl
Expires On:	2023-09-25	
Updated On:	2022-10-14	apl
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited	da
Name Servers:	donald.ns.cloudflare.com robin.ns.cloudflare.com	apj

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apkmartapp.com	Buy Now
apkmartconsulting.com	Buy Now
apkmartusa.com	Buy Now
dapkmart.net	Buy Now
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Registrant Contact	
Name:	Registration Private
Organization:	Domains By Proxy, LLC
Street:	DomainsByProxy.com 2155 E Warner Rd
City:	Tempe
State:	Arizona
Postal Code:	85284
Country:	US
Phone:	+1.4806242599
Fax:	+1.4806242598
Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx? domain=apkmart.net

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Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=apkmart.net

Technical Contact	
Name:	Registration Private
Organization:	Domains By Proxy, LLC
Street:	DomainsByProxy.com 2155 E Warner Rd
City:	Tempe
State:	Arizona
Postal Code:	85284
Country:	US
Phone:	+1.4806242599
Fax:	+1.4806242598
Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx? domain=apkmart.net

Raw Whois Data

```
Domain Name: apkmart.net
```

Registry Domain ID: 2314026598_DOMAIN_NET-VRSN Registrar WHOIS Server: whois.godaddy.com Registrar URL: https://www.godaddy.com Updated Date: 2022-09-25T01:24:10Z Creation Date: 2018-09-25T03:12:03Z

Registrar Registration Expiration Date: 2023-09-25T03:12:03Z

Registrar: GoDaddy.com, LLC Registrar IANA ID: 146

Registrar Abuse Contact Email: $\mathbf{abuse} @ \mathsf{godaddy.com} \\$ Registrar Abuse Contact Phone: +1.4806242505

Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi ${\tt Domain \ Status: \ client Update Prohibited \ https://icann.org/epp\#client Update Prohibited}$ Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited

Registry Registrant ID: Not Available From Registry

Registrant Name: Registration Private

Registrant Organization: Domains By Proxy, LLC

Registrant Street: DomainsByProxy.com Registrant Street: 2155 E Warner Rd

Registrant City: Tempe

Registrant State/Province: Arizona Registrant Postal Code: 85284

Registrant Country: US

Registrant Phone: +1.4806242599 Registrant Phone Ext: Registrant Fax: +1.4806242598

Registrant Fax Ext:

Registrant Email: Select Contact Domain Holder link at https://www.godaddy.com/whoi

Registry Admin ID: Not Available From Registry

Admin Name: Registration Private

Admin Organization: Domains By Proxy, LLC

Admin Street: DomainsByProxy.com Admin Street: 2155 E Warner Rd

Admin City: Tempe

Admin State/Province: Arizona Admin Postal Code: 85284

Admin Country: US Admin Phone: +1.4806242599

Admin Phone Ext: Admin Fax: +1.4806242598 Admin Fax Ext:

Admin Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/res

2/20/23, 5:38 PM Whois apkmart.net

Registry Tech ID: Not Available From Registry

Tech Name: Registration Private

Tech Organization: Domains By Proxy, LLC

Tech Street: DomainsByProxy.com Tech Street: 2155 E Warner Rd

Tech City: Tempe

Tech State/Province: Arizona Tech Postal Code: 85284

Tech Country: US Tech Phone: +1.4806242599

Tech Phone Ext: Tech Fax: +1.4806242598

Tech Fax Ext:

Tech Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/resu

Name Server: DONALD.NS.CLOUDFLARE.COM Name Server: ROBIN.NS.CLOUDFLARE.COM

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2023-02-10T10:22:43Z <<<

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

TERMS OF USE: The data contained in this registrar's Whois database, while believed registrar to be reliable, is provided "as is" with no guarantee or warranties regar accuracy. This information is provided for the sole purpose of assisting you in obt information about domain name registration records. Any use of this data for any ot is expressly forbidden without the prior written permission of this registrar. By s an inquiry, you agree to these terms and limitations of warranty. In particular, yo to use this data to allow, enable, or otherwise support the dissemination or collec data, in part or in its entirety, for any purpose, such as transmission by e-mail, postal mail, facsimile or other means of mass unsolicited, commercial advertising o of any kind, including spam. You further agree not to use this data to enable high or robotic electronic processes designed to collect or compile this data for any pumining this data for your own personal or commercial purposes. Failure to comply wi may result in termination of access to the Whois database. These terms may be subje at any time without notice.

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View Knowledge Base

Hosting Security

Support

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AABETIK SQUARE

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021454] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkmart.net]

1 message

hotstar_enforcement@markscan.in <hotstar_enforcement@markscan.in>

Mon, Feb 20, 2023 at 2:32

To: mirhayatkhan126511@gmail.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work **Properties of HotStar and Hotstar.** In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to Properties of HotStar and Hotstar being illegally made available on your website:

https://www.apkmart.net/app/pikashow-apk-193/ https://www.apkmart.net/app/rts-tv-apk-119/

https://www.apkmart.net/app/stream-india-apk-198/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

Star House, Urmi Estate,

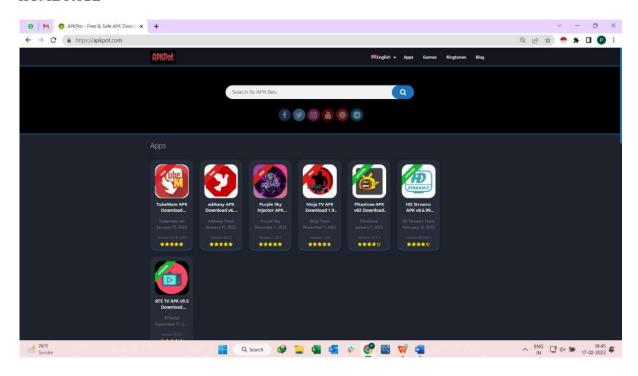
95, Ganpatrao Kadam Marg,

Lower Parel (W), Mumbai- 400013

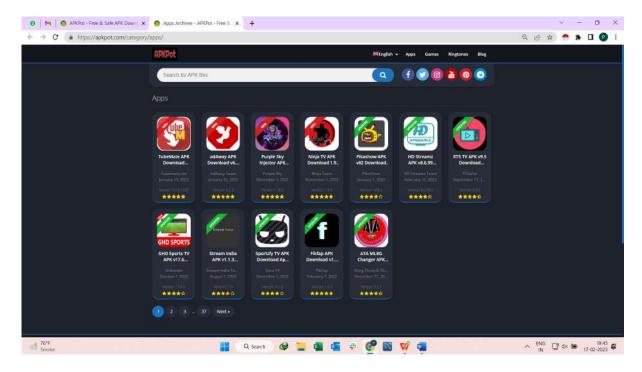
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKPOT.COM

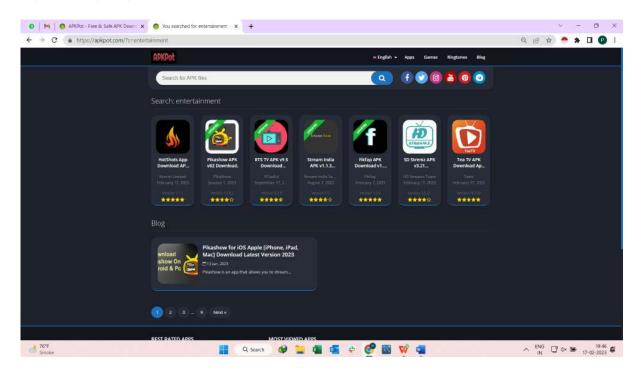
HOME PAGE



CATEGORY

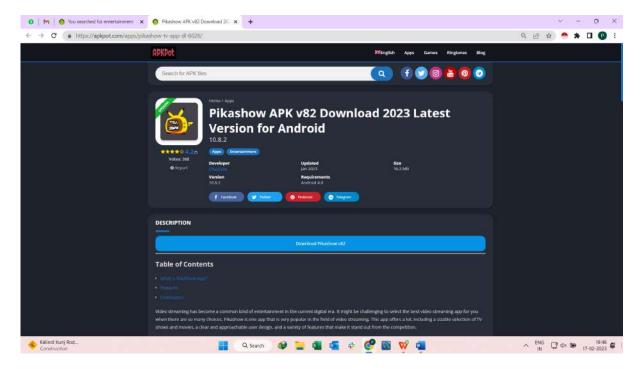


ENTERTAINMENT

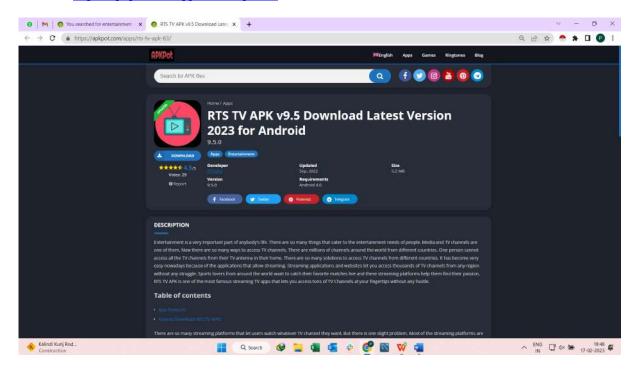


ROGUE APPS AVAILABLE ON THE WEBSITE APKPOT.COM

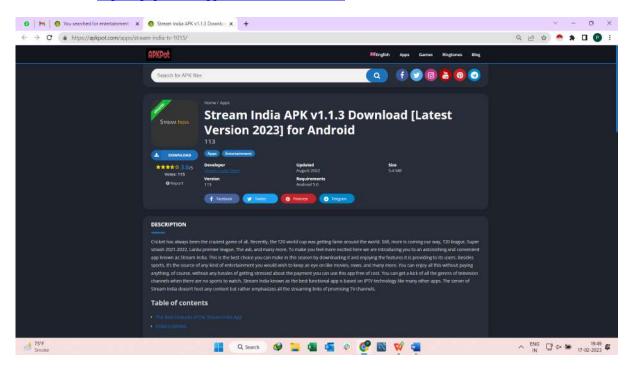
Pikashow: https://apkpot.com/apps/pikashow-tv-app-dl-6028/



RTS TV: https://apkpot.com/apps/rts-tv-apk-63/



Stream India: https://apkpot.com/apps/stream-india-tv-1015/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Pikashow - Good Luck Jerry



RTS TV - Anupamaa



Stream India - Kabhi Kabhi Ittefaq Sey



2/20/23, 5:39 PM Whois apkpot.com

67



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Domain Information	
Domain:	apkpot.com
Registrar:	NameCheap, Inc.
Registered On:	2015-06-17
Expires On:	2023-06-17
Updated On:	2021-06-23
Status:	clientTransferProhibited
Name Servers:	alan.ns.cloudflare.com jill.ns.cloudflare.com

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Registrant Contact

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Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	669185948b21493fb294cda0810b1c38.protect @withheldforprivacy.com

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Administrative Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	669185948b21493fb294cda8818b1c38.protect @withheldforprivacy.com

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Technical Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2

2/20/23, 5:39 PM Whois apkpot.com

City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	669185948b21493fb294cda0810b1c38.protect @withheldforprivacy.com

```
Raw Whois Data
Domain name: apkpot.com
Registry Domain ID: 1939459536_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.namecheap.com
Registrar URL: http://www.namecheap.com
Updated Date: 2021-06-23T04:16:32.00Z
Creation Date: 2015-06-17T10:47:25.00Z
Registrar Registration Expiration Date: 2023-06-17T10:47:25.00Z
Registrar: NAMECHEAP INC
Registrar IANA ID: 1068
Registrar Abuse Contact Email: abuse@namecheap.com
Registrar Abuse Contact Phone: +1.9854014545
Reseller: NAMECHEAP INC
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi
Domain Status: transferPeriod https://icann.org/epp#transferPeriod
Registry Registrant ID:
Registrant Name: Redacted for Privacy
Registrant Organization: Privacy service provided by Withheld for Privacy ehf
Registrant Street: Kalkofnsvegur 2
Registrant City: Reykjavik
Registrant State/Province: Capital Region
Registrant Postal Code: 101
Registrant Country: IS
Registrant Phone: +354.4212434
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 669185948b21493fb294cda0810b1c38.protect@withheldforprivacy.com
Registry Admin ID:
Admin Name: Redacted for Privacy
Admin Organization: Privacy service provided by Withheld for Privacy ehf
Admin Street: Kalkofnsvegur 2
Admin City: Reykjavik
Admin State/Province: Capital Region
Admin Postal Code: 101
Admin Country: IS
Admin Phone: +354.4212434
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: 669185948b21493fb294cda9819b1c38.protect@withheldforprivacy.com
Registry Tech ID:
Tech Name: Redacted for Privacy
Tech Organization: Privacy service provided by Withheld for Privacy ehf
Tech Street: Kalkofnsvegur 2
Tech City: Reykjavik
Tech State/Province: Capital Region
Tech Postal Code: 101
Tech Country: IS
Tech Phone: +354.4212434
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
\textbf{Tech Email: } \textbf{669185948b21493fb294cda0810b1c38.protect} @ \textbf{withheldforprivacy.com} \\
Name Server: jill.ns.cloudflare.com
Name Server: alan.ns.cloudflare.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-02-20T08:09:13.83Z <<<
For more information on Whois status codes, please visit https://icann.org/epp
```

related domain names

2/20/23, 5:39 PM Whois apkpot.com



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Windows Reseller Hosting

Dedicated Servers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

Infrastructure

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

Support

View Knowledge Base

Contact Support

Report Abuse

About Whois

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Agar Is Segan

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021462] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkpot.com]

1 message

hotstar_enforcement@markscan.in <hotstar_enforcement@markscan.in>

Mon, Feb 20, 2023 at 2:32

To: support@apkpot.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

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Novi Digital is the exclusive owner of the copyright in the work Properties of HotStar and Hotstar. In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to Properties of HotStar and Hotstar being illegally made available on your website:

https://apkpot.com/apps/stream-india-tv-1015/

https://apkpot.com/apps/rts-tv-apk-63/

https://apkpot.com/apps/pikashow-tv-app-dl-6028/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

Star House, Urmi Estate,

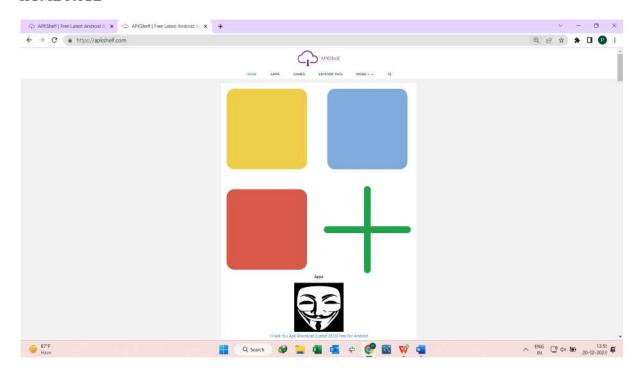
95, Ganpatrao Kadam Marg,

Lower Parel (W), Mumbai- 400013

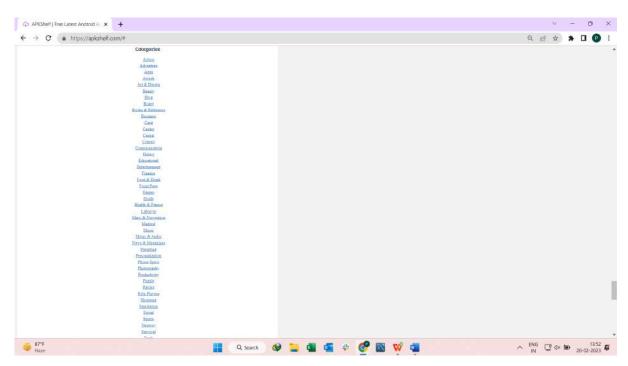
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, APKSHELF.COM

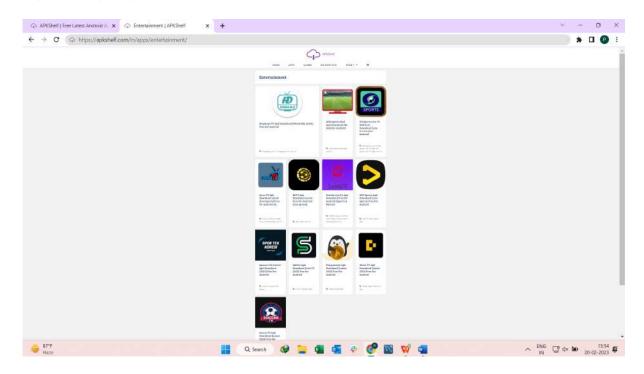
HOME PAGE



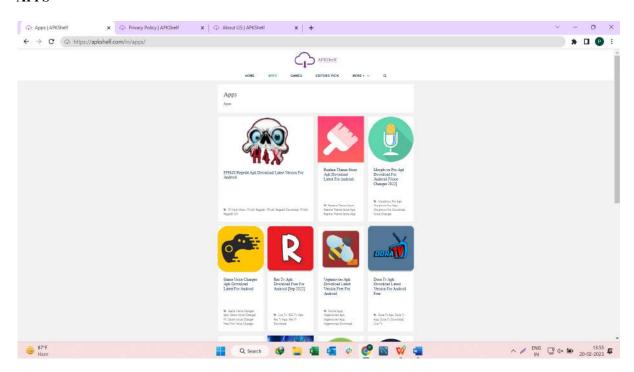
CATEGORIES



ENTERTAINMENT

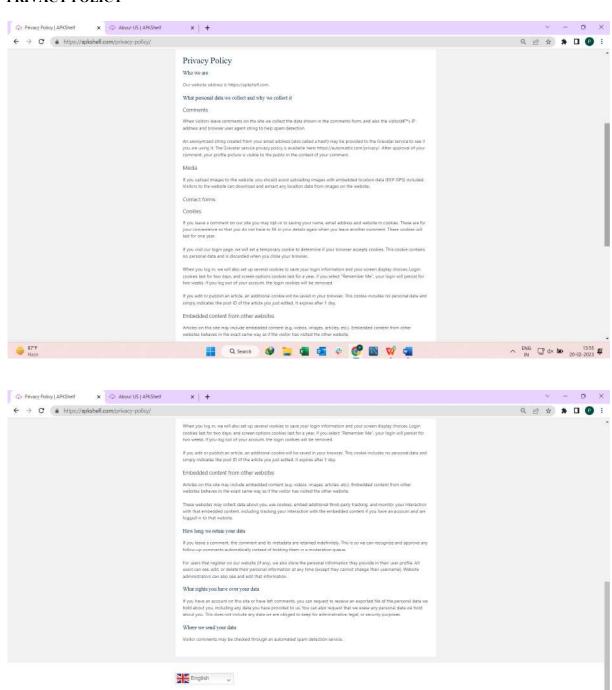


APPS



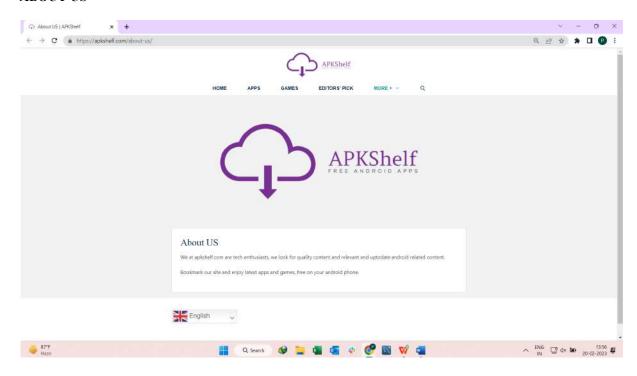
PRIVACY POLICY

€ 87°F Haze



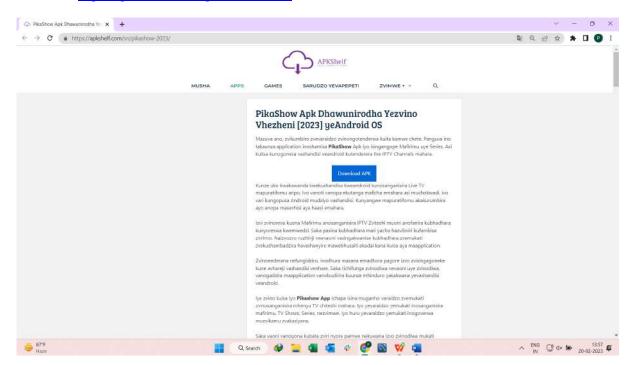
📘 Q Search 🗳 📜 🚮 🍒 💠 🚱 🔯 🥡 👊

ABOUT US



ROGUE APPS AVAILABLE ON THE WEBSITE APKSHELF.COM

Pikashow: https://apkshelf.com/sn/pikashow-2023/



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2/20/23, 5:39 PM Whois apkshelf.com **78**



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Domain Information	
Domain:	apkshelf.com
Registrar:	NameCheap, Inc.
Registered On:	2019-02-04
Expires On:	2028-02-04
Updated On:	2022-08-15
Status:	clientTransferProhibited
Name Servers:	hal.ns.cloudflare.com jean.ns.cloudflare.com

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Registrant Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	430f853c60b84924a96abb9a10b3618f.protect @withheldforprivacy.com

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Administrative Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2
City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	438f853c68b84924a96abb9a18b3618f.protect @withheldforprivacy.com

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Technical Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
Street:	Kalkofnsvegur 2

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City:	Reykjavik
State:	Capital Region
Postal Code:	101
Country:	IS
Phone:	+354.4212434
Email:	438f853c60b84924a96abb9a10b3618f.protect @withheldforprivacy.com

```
Raw Whois Data
Domain name: apkshelf.com
Registry Domain ID: 2358037472_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.namecheap.com
Registrar URL: http://www.namecheap.com
Updated Date: 2022-08-15T12:48:04.79Z
Creation Date: 2019-02-04T15:08:23.00Z
Registrar Registration Expiration Date: 2028-02-04T15:08:23.00Z
Registrar: NAMECHEAP INC
Registrar IANA ID: 1068
Registrar Abuse Contact Email: abuse@namecheap.com
Registrar Abuse Contact Phone: +1.9854014545
Reseller: NAMECHEAP INC
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi
Registry Registrant ID:
Registrant Name: Redacted for Privacy
Registrant Organization: Privacy service provided by Withheld for Privacy ehf
Registrant Street: Kalkofnsvegur 2
Registrant City: Reykjavik
Registrant State/Province: Capital Region
Registrant Postal Code: 101
Registrant Country: IS
Registrant Phone: +354.4212434
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: 430f853c60b84924a96abb9a10b3618f.protect@withheldforprivacy.com
Registry Admin ID:
Admin Name: Redacted for Privacy
Admin Organization: Privacy service provided by Withheld for Privacy ehf
Admin Street: Kalkofnsvegur 2
Admin City: Reykjavik
Admin State/Province: Capital Region
Admin Postal Code: 101
Admin Country: IS
Admin Phone: +354.4212434
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: 430f853c60b84924a96abb9a10b3618f.protect@withheldforprivacy.com
Registry Tech ID:
Tech Name: Redacted for Privacy
Tech Organization: Privacy service provided by Withheld for Privacy ehf
Tech Street: Kalkofnsvegur 2
Tech City: Reykjavik
Tech State/Province: Capital Region
Tech Postal Code: 101
Tech Country: IS
Tech Phone: +354.4212434
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
\textbf{Tech Email: 439f853c60b84924a96abb9a10b3618f.protect} @ \textbf{withheldforprivacy.com} \\
Name Server: hal.ns.cloudflare.com
Name Server: jean.ns.cloudflare.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-02-19T23:09:51.83Z <<<
For more information on Whois status codes, please visit https://icann.org/epp
```

related domain names

namecheap.com icann.org cloudflare.com withheldforprivacy.com internic.net

2/20/23, 5:39 PM Whois apkshelf.com **80**



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WordPress Hosting

Linux Reseller Hosting

Windows Reseller Hosting

Dedicated Servers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

Infrastructure

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

Support

View Knowledge Base

Contact Support

Report Abuse

About Whois

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Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:256654654] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:apkshelf.com]

1 message

Hotstar Enforcement < hotstar_enforcement@markscan.in > To: 430f853c60b84924a96abb9a10b3618f.protect@withheldforprivacy.com Mon, Feb 20, 2023 at 10:32 PM

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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:

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Novi Digital is the exclusive owner of the copyright in the work **Properties of HotStar and Hotstar.** In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to Properties of HotStar and Hotstar being illegally made available on your website:

https://apkshelf.com/sn/pikashow-2023/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

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

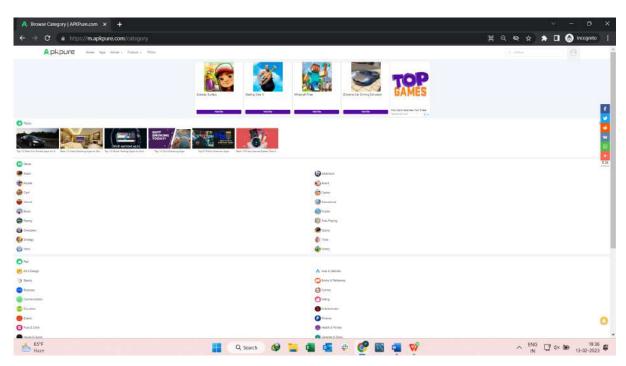
In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, M.APKPURE.COM

HOME PAGE



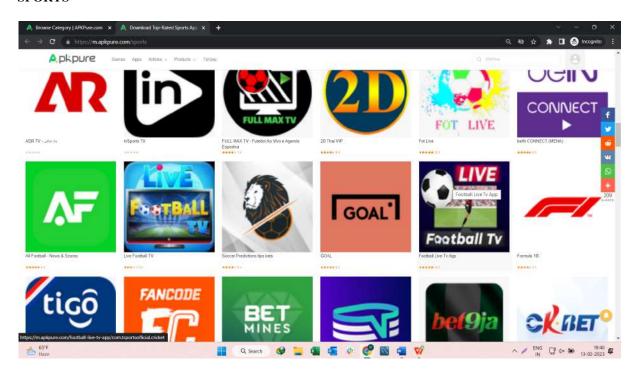
CATEGORIES



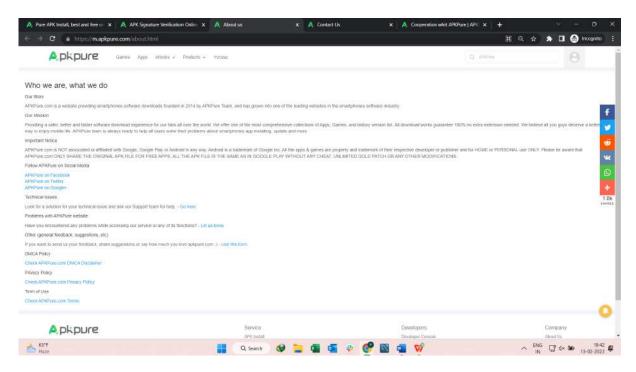
ENTERTAINMENT



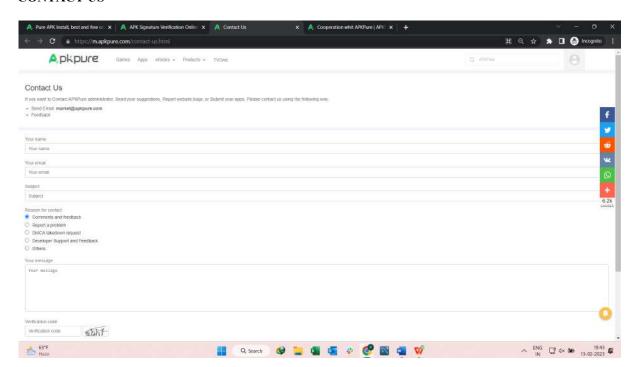
SPORTS



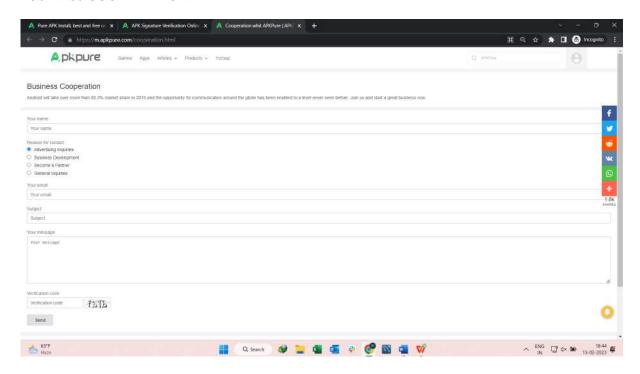
ABOUT



CONTACT US

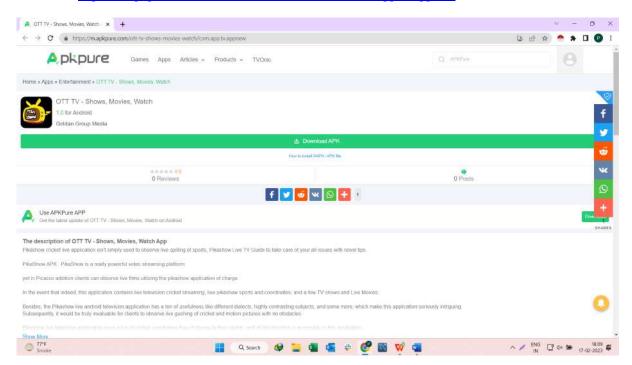


BUSINESS COOPERATION

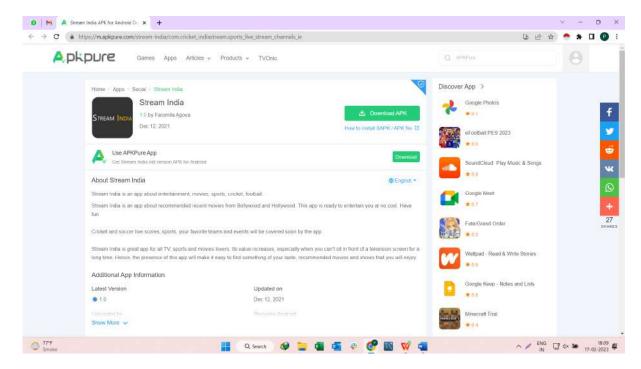


ROGUE APPS AVAILABLE ON THE WEBSITE M.APKPURE.COM

Pikashow: https://m.apkpure.com/ott-tv-shows-movies-watch/com.app.tv.appnew



Stream India: https://m.apkpure.com/stream-india/com.cricket indiastream.sports live stream channels ie



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Pikashow - Good Luck Jerry



Stream India - Kabhi Kabhie Ittefaq Sey



2/20/23, 5:37 PM Whois apkpure.com

90



Enter Domain or IP WHOIS

DOMAINS

WEBSITE

Registrant Contact

+1.4155319336

admin@dnstinations.com

Fax:

Email:

CLOUD

HOSTING

SERVERS

EMAIL

SECURITY

WHOIS

SUPPORT

LOGIN

0

apkpure.com

Updated 5 days ago 💍

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Domain Information		
Domain:	apkpure.com	
Registrar:	MarkMonitor Inc.	
Registered On:	2014-11-28	
Expires On:	2031-11-28	
Updated On:	2022-10-24	
Status:	clientDeleteProhibited clientTransferProhibited clientUpdateProhibited serverDeleteProhibited serverTransferProhibited serverUpdateProhibited	
Name Servers:	adam.ns.cloudflare.com elma.ns.cloudflare.com	

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apkpuregames.com	Buy Now
apkpurity.com	Buy Now
apkpurified.net	Buy Now
pkspure.net	Buy Now

Name: Domain Administrator Organization: DNStination Inc. Street: 3450 Sacramento Street, Suite 405 City: San Francisco State: CA Postal Code: 94118 Country: US Phone: +1.4155319335

.space \$24.88 **\$0.88**

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.BIZ @ \$7.88 \$19.88

Administrative Contact	
Name:	Domain Administrator
Organization:	DNStination Inc.
Street:	3450 Sacramento Street, Suite 405
City:	San Francisco
State:	CA
Postal Code:	94118
Country:	US
Phone:	+1.4155319335



Fax: +1.4155319336 Email: admin@dnstinations.com

Technical Contact	
Name:	Domain Administrator
Organization:	DNStination Inc.
Street:	3450 Sacramento Street, Suite 405
City:	San Francisco
State:	CA
Postal Code:	94118
Country:	US
Phone:	+1.4155319335
Fax:	+1.4155319336
Email:	admin@dnstinations.com

Raw Whois Data

Domain Name: apkpure.com

Registry Domain ID: 1887620488_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.markmonitor.com Registrar URL: http://www.markmonitor.com Updated Date: 2022-10-24T04:36:35+0000 Creation Date: 2014-11-28T11:29:15+0000

Registrar Registration Expiration Date: 2031-11-28T00:00:00+0000

Registrar: MarkMonitor, Inc.

Registrar IANA ID: 292

Registrar Abuse Contact Email: abusecomplaints@markmonitor.com

Registrar Abuse Contact Phone: +1.2086851750

Domain Status: clientUpdateProhibited (https://www.icann.org/epp#clientUpdateProhib Domain Status: clientTransferProhibited (https://www.icann.org/epp#clientTransferPr Domain Status: clientDeleteProhibited (https://www.icann.org/epp#clientDeleteProhib Domain Status: serverUpdateProhibited (https://www.icann.org/epp#serverUpdateProhib Domain Status: serverTransferProhibited (https://www.icann.org/epp#serverTransferPr Domain Status: serverDeleteProhibited (https://www.icann.org/epp#serverDeleteProhib

Registry Registrant ID:

Registrant Name: Domain Administrator Registrant Organization: DNStination Inc.

Registrant Street: 3450 Sacramento Street, Suite 405

Registrant City: San Francisco Registrant State/Province: CA Registrant Postal Code: 94118 Registrant Country: US Registrant Phone: +1.4155319335 Registrant Phone Ext:

Registrant Fax: +1.4155319336

Registrant Fax Ext:

Registrant Email: admin@dnstinations.com

Registry Admin ID:

Admin Name: Domain Administrator Admin Organization: DNStination Inc.

Admin Street: 3450 Sacramento Street, Suite 405

Admin City: San Francisco Admin State/Province: CA Admin Postal Code: 94118 Admin Country: US Admin Phone: +1.4155319335

Admin Phone Ext: Admin Fax: +1.4155319336

Admin Fax Ext:

Registry Tech ID:

Admin Email: admin@dnstinations.com

Tech Name: Domain Administrator Tech Organization: DNStination Inc.

Tech Street: 3450 Sacramento Street, Suite 405

Tech City: San Francisco Tech State/Province: CA Tech Postal Code: 94118 Tech Country: US

Tech Phone: +1.4155319335

Tech Phone Ext:

Tech Fax: +1.4155319336

Tech Fax Ext:

Tech Email: admin@dnstinations.com Name Server: adam.ns.cloudflare.com Name Server: elma.ns.cloudflare.com

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2023-02-14T13:02:32+0000 <<<

For more information on WHOIS status codes, please visit: https://www.icann.org/resources/pages/epp-status-codes

If you wish to contact this domain's Registrant, Administrative, or Technical contact, and such email address is not visible above, you may do so via our web form, pursuant to ICANN's Temporary Specification. To verify that you are not a robot, please enter your email address to receive a link to a page that facilitates email communication with the relevant contact(s).

Web-based WHOIS:

https://domains.markmonitor.com/whois

If you have a legitimate interest in viewing the non-public WHOIS details, send your request and the reasons for your request to whoisrequest@markmonitor.com
and specify the domain name in the subject line. We will review that request and may ask for supporting documentation and explanation.

The data in MarkMonitor's WHOIS database is provided for information purposes, and to assist persons in obtaining information about or related to a domain name's registration record. While MarkMonitor believes the data to be accurate, the data is provided "as is" with no guarantee or warranties regarding its accuracy.

By submitting a WHOIS query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to:

- (1) allow, enable, or otherwise support the transmission by email, telephone, or facsimile of mass, unsolicited, commercial advertising, or spam; or
- (2) enable high volume, automated, or electronic processes that send queries, data, or email to MarkMonitor (or its systems) or the domain name contacts (or its systems).

MarkMonitor reserves the right to modify these terms at any time.

By submitting this query, you agree to abide by this policy.

MarkMonitor Domain Management(TM)
Protecting companies and consumers in a digital world.

Visit MarkMonitor at https://www.markmonitor.com Contact us at +1.8007459229 In Europe, at +44.02032062220

related domain names

markmonitor.com icann.org cloudflare.com dnstinations.com internic.net



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Transfer Domain Name

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Windows Hosting

Hosting & Products

Datacenter Details
Hosting Security

View Domain Pricing

WordPress Hosting

24 x 7 Servers Monitoring

Backup and Recovery

Whois Lookup

Linux Reseller Hosting

Windows Reseller Hosting

Dedicated Servers

Free with Every Domain

Name Suggestion Tool

Cl III I

Support

Domain Offers

Cloud Hosting

View Knowledge Base

Website Builder

Contact Support

2/20/23, 5:37 PM Whois apkpure.com

Business Email Report Abuse

Enterprise Email About Whois

Google Workspace

SSL Certificates

Sitelock

CodeGuard

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AABETIK SQUARE

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021452] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:m.apkpure.com]

1 message

hotstar_enforcement@markscan.in <hotstar_enforcement@markscan.in>

Mon, Feb 20, 2023 at 2:32

To: market@apkpure.com

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work Properties of HotStar and Hotstar. In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to Properties of HotStar and Hotstar being illegally made available on your website:

https://m.apkpure.com/stream-india/com.cricket_indiastream. sports live stream channels ie https://m.apkpure.com/ott-tv-shows-movies-watch/com.app.tv.appnew

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

INTELLECTUAL PROPERTY OWNERS:

Star India Pvt. Ltd. and Novi Digital Entertainment Private Limited

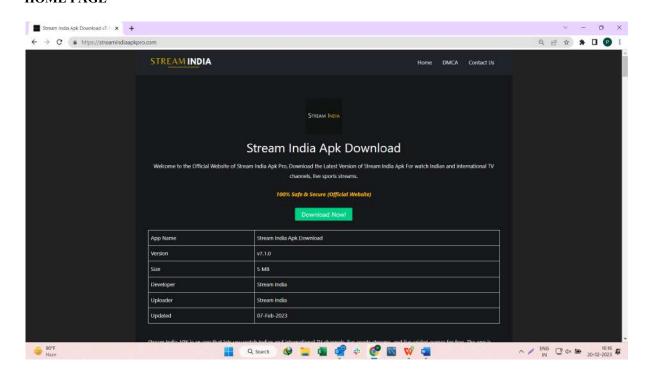
Star House, Urmi Estate,

95, Ganpatrao Kadam Marg,

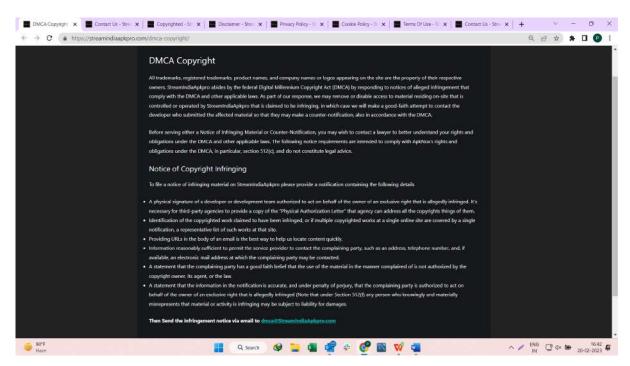
Lower Parel (W), Mumbai- 400013

In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

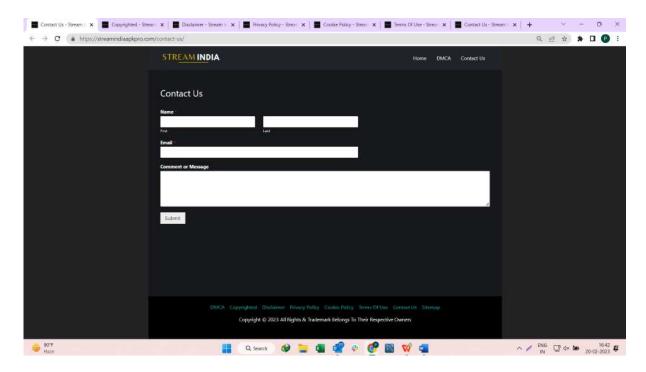
EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, STREAMINDIAAPKPRO.COM HOME PAGE



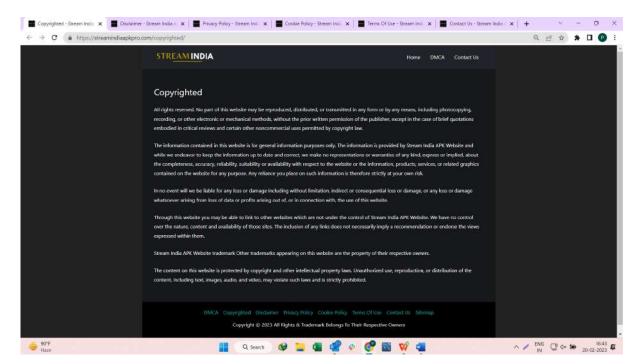
DMCA COPYRIGHT



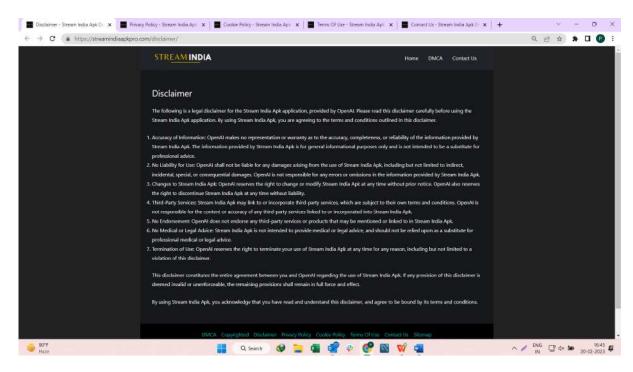
CONTACT US



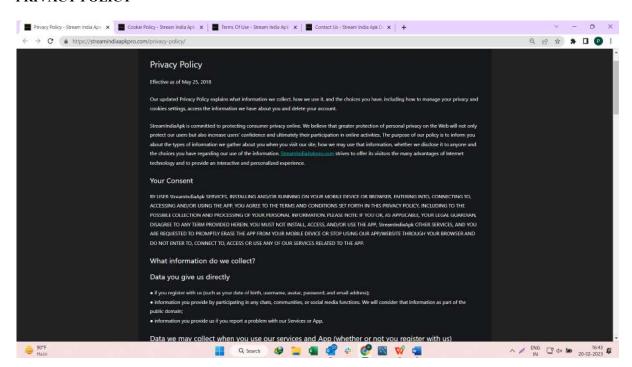
COPYRIGHTED

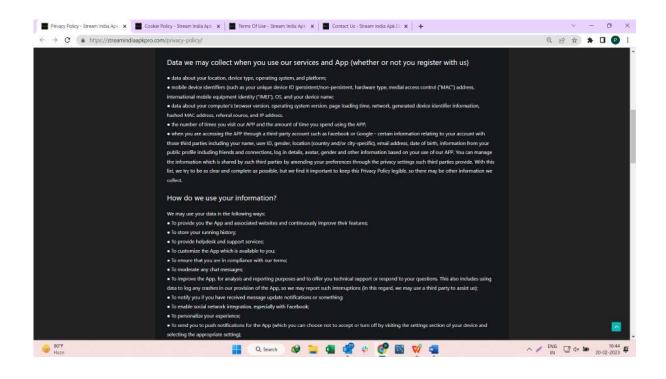


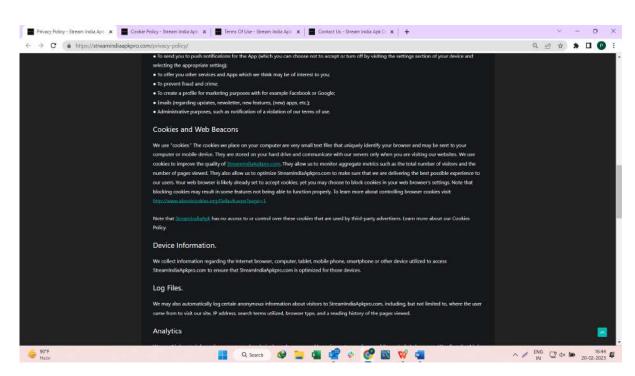
DISCLAIMER

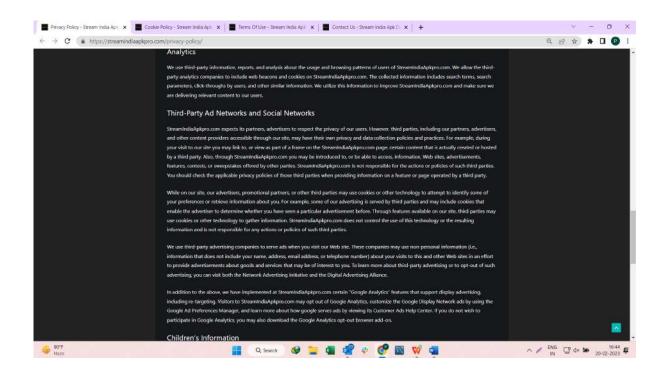


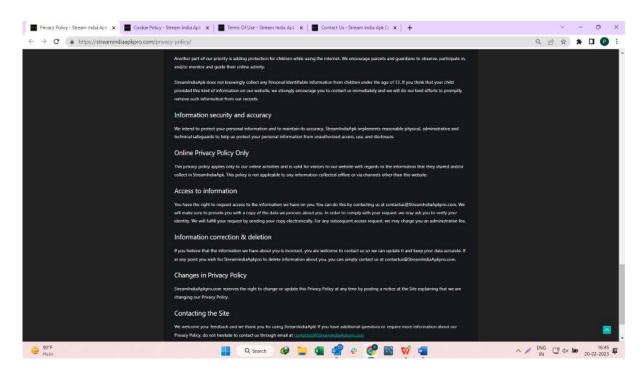
PRIVACY POLICY



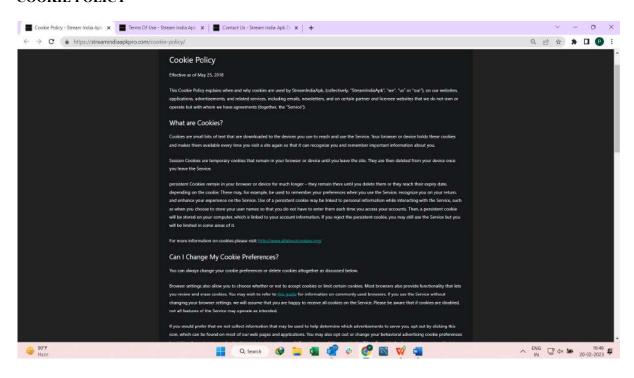


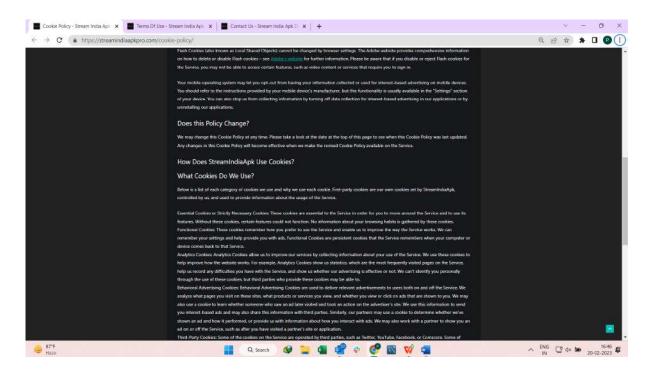


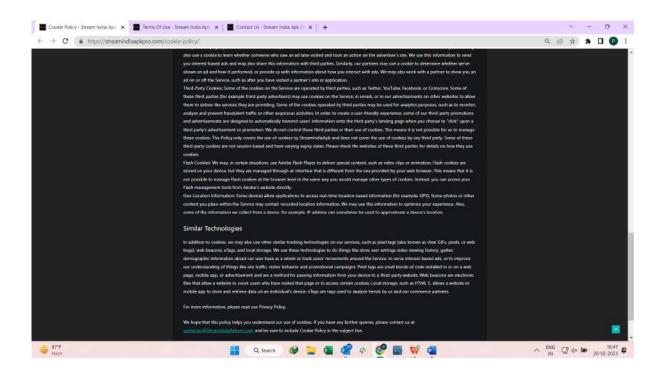




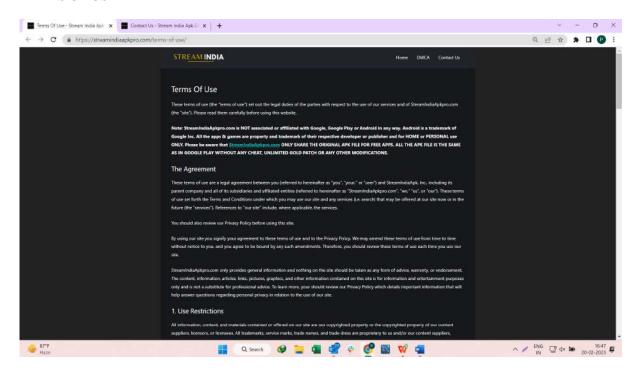
COOKIE POLICY





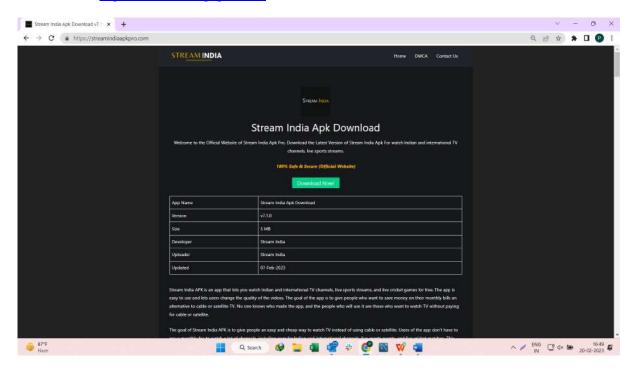


TERMS OF USE



ROGUE APPS AVAILABLE ON THE WEBSITE APKASSET.COM

Stream India: https://streamindiaapkpro.com/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Kabhi Kabhie Ittefaq Sey





Enter Domain or IP

WHOIS

DOMAINS

Domain:

Registrar:

Registered On:

Expires On:

Updated On:

Name Servers:

Status:

WEBSITE

CLOUD

streamindiaapkpro.com

clientDeleteProhibited

clientRenewProhibited

coco.ns.cloudflare.com

lloyd.ns.cloudflare.com

clientTransferProhibited clientUpdateProhibited

Cosmotown, Inc.

2023-01-29

2024-01-29

2023-02-06

HOSTING

SERVERS

EMAIL

SECURITY

WHOIS

SUPPORT

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Raw Whois Data

Domain Name: STREAMINDIAAPKPRO.COM

Registry Domain ID: 2754630952_DOMAIN_COM-VRSN Registrar WHOIS Server: whois.ccdomain.co.kr Registrar URL: http://www.cosmotown.com Updated Date: 2023-02-06T17:34:40Z Creation Date: 2023-01-29T16:32:24Z Registry Expiry Date: 2024-01-29T16:32:24Z

Registrar: Cosmotown, Inc. Registrar IANA ID: 1509 Registrar Abuse Contact Email: Registrar Abuse Contact Phone:

Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited

Name Server: COCO.NS.CLOUDFLARE.COM Name Server: LLOYD.NS.CLOUDFLARE.COM

DNSSEC: unsigned

URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

streamingindiaapkpro.n

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*Offer ends 28th February 2023

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106

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Transfer Domain Name

View Domain Pricing

Whois Lookup

Name Suggestion Tool
Free with Every Domain

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Windows Reseller Hosting

Dedicated Servers

Cloud Hosting

Cioda i iosting

Website Builder

Business Email
Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

Infrastructure

Datacenter Details

Hosting Security

24 x 7 Servers Monitoring

Backup and Recovery

Support

View Knowledge Base

Contact Support

Report Abuse

About Whois

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A441FIKSCA1FI

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:98876987894] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:streamindiaapkpro.com]

1 message

Hotstar Enforcement hotstar_enforcement@markscan.in To: dmca@streamindiaapkpro.com

Mon, Feb 20, 2023 at 7:24 PM

Dear Sir/Madam,

This is to bring to your attention that we have found copyright infringements on an application (listed below) that is using your services, further indulging in the act of digital piracy by providing copyright content of our client "Novi Digital Entertainment Pvt."

Please note we, MarkScan, act on behalf of our Client, **Novi Digital Entertainment Pvt.** which is amongst India's most diverse media companies. It is brought to your notice that Our Client has exclusive digital rights to several films/web series to broadcast, telecast, and/or communicate to the public, content on the digital OTT platform, "hotstar.com". No other entity can, without authorization from Our Client, upload, stream, make available for download, broadcast, and/or communicate to the public, the content/movie highlighted above, 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.

Stream India is a pirate **application** that has been illegally broadcasting the signals of the Indian-origin **channels of Star** 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 **Stream India App** is using your services on their **application** which is further indulging in the act of copyright piracy by providing unauthorized streams of digital content without consent to the copyright owner. Please act expeditiously to remove or disable access to the infringing material as listed below.

Application Name: - Stream India

URL:- https://streamindiaapkpro.com/

Accordingly, this 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.** (Digital 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, of 1998.

We have good faith & belief that the use of the described material in the manner complained of is not authorized by the copyright owner, its agent, or the law. The information in the notification is accurate, and under penalty of perjury, the complaining party is authorized to act on behalf of the owner of an exclusive right that is allegedly infringed. We hereby declare that the information in the notification is accurate to the best of our knowledge & belief.

AUTHORIZATION LETTER OF THE COPYRIGHT OWNER (OR PERSON/COMPANY REPRESENTING) http://markscan.co.in/LOA HOTSTAR.pdf

A DOCUMENT PROVING THAT THE MATERIALS ARE COPYRIGHTED AND BELONG TO OWNER (OR PERSON/COMPANY REPRESENTING)

https://www.hotstar.com/in

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM Ishita Singh

MarkScan

2/20/23, 7:26 PM MarkScan Mail - [Notice ID:98876987894] Copyright Infringement Notice under DMCA & Indian Copyright Act [Pprojectreamindi...

Email: hotstar_enforcement@markscan.in E-14C 1st floor, Sector 8, Noida U.P. India.

Ph: +91-11-43596246, Website: www.markscan.co.in.

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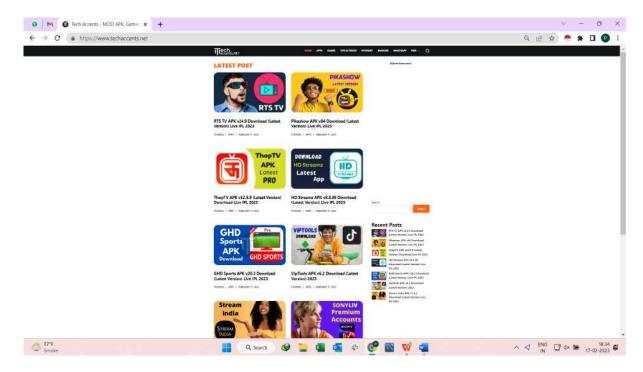
Novi Digital Entertainment Pvt. Ltd. Star House, Urmi Estate, 95, Ganpatrao Kadam Marg, Lower Parel (West), Mumbai - 400013, India. Ph No. +91 22 66305555 Fax No. +91 22 66305050

Regards,

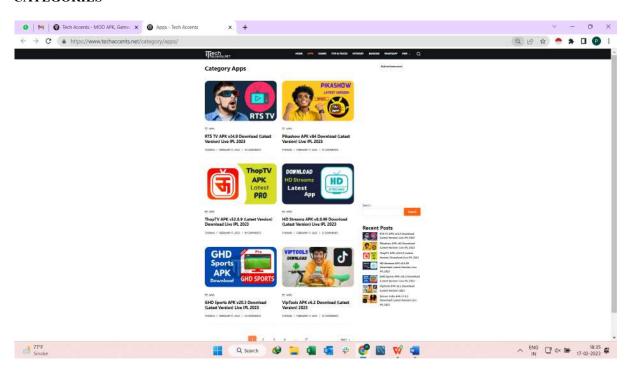
MarkScan Internet Enforcement Team

EVIDENCE EVINCING ROGUE NATURE OF THE WEBSITE, TECHACCENTS.NET

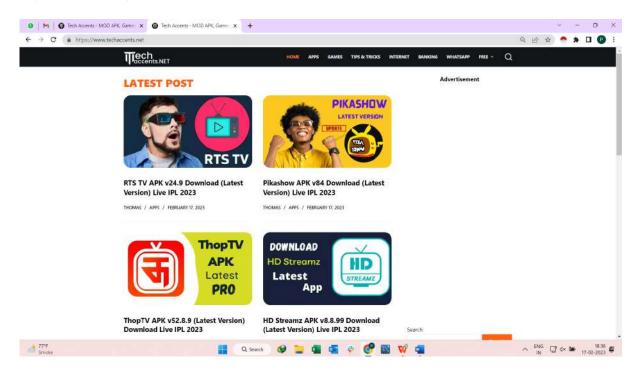
HOME PAGE



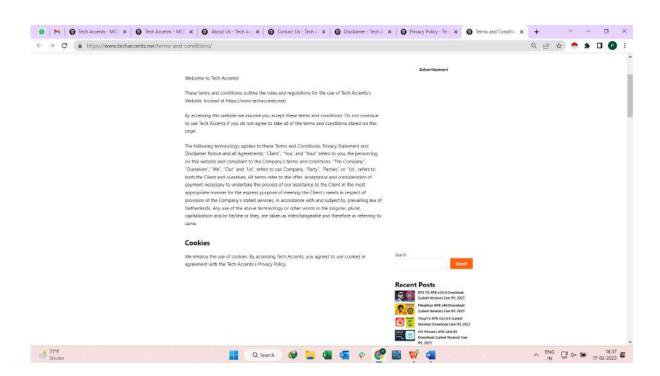
CATEGORIES

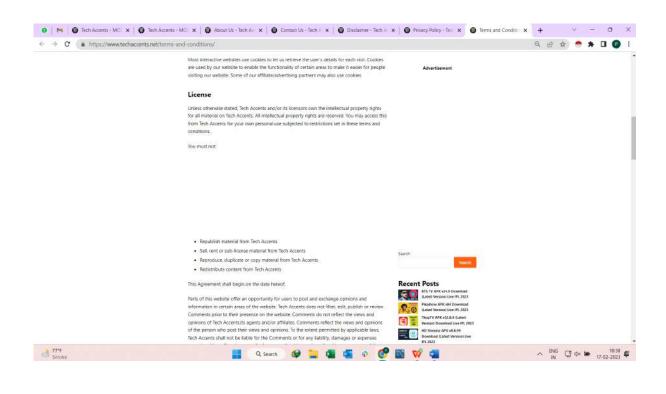


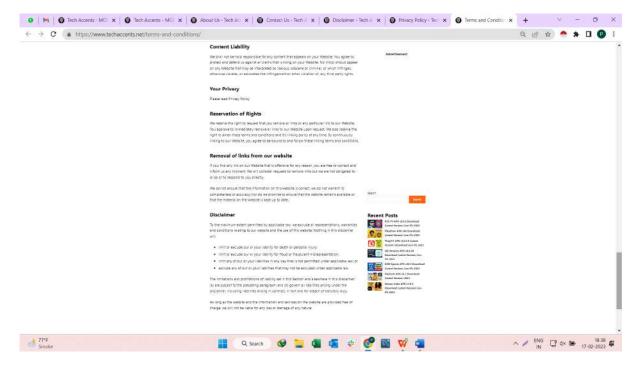
ENTERTAINMENT



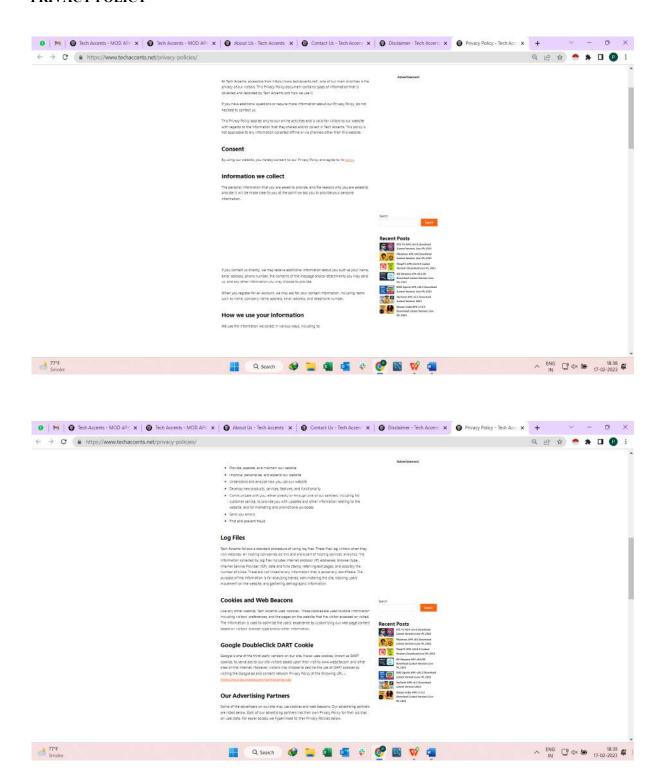
TERMS AND CONDITIONS

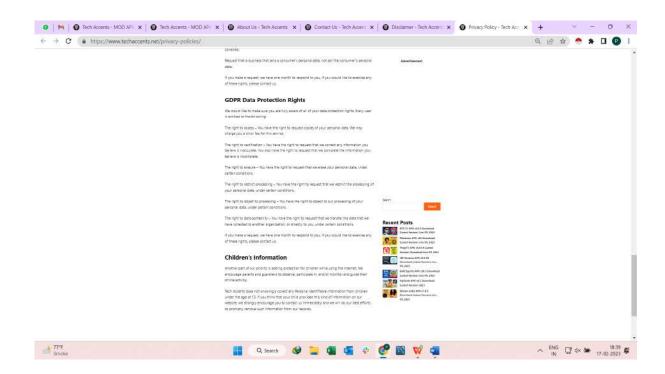




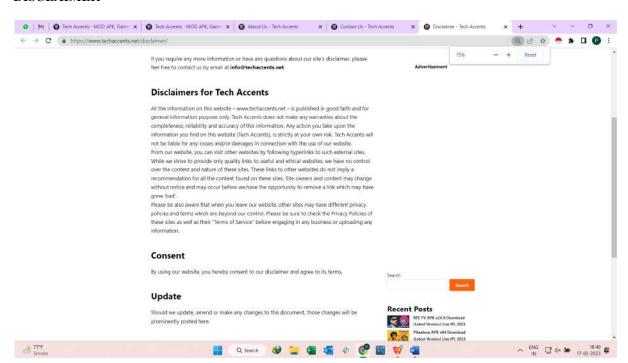


PRIVACY POLICY

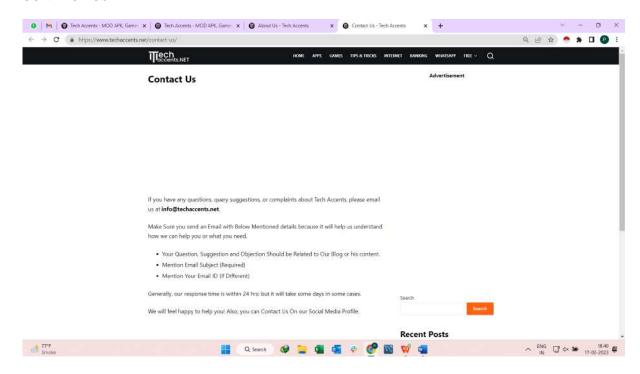




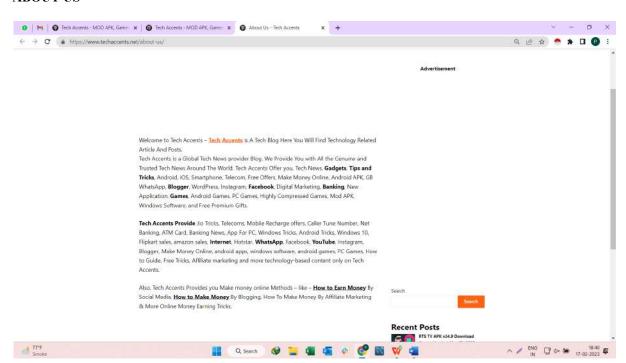
DISCLAIMER



CONTACT US

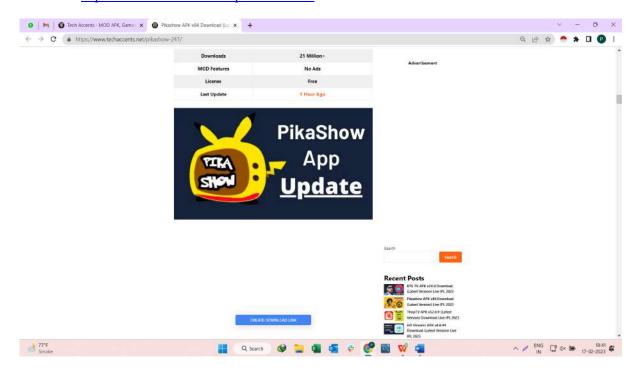


ABOUT US

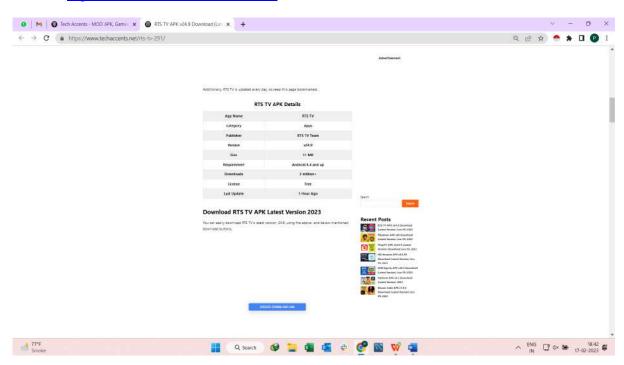


ROGUE APPS AVAILABLE ON THE WEBSITE TECHACCENTS.NET

Pikashow: https://www.techaccents.net/pikashow-247/



RTS TV: https://www.techaccents.net/rts-tv-291/



INFRINGEMENT OF PLAINTIFFS' CONTENT ON THE ABOVE MENTIONED ROGUE APP

Pikashow - Good Luck Jerry



RTS TV - Anupamaa



2/20/23, 5:38 PM Whois techaccents.net **117**



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techaccents.net

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Domain:	techaccents.net	
Registrar:	Cosmotown, Inc.	
Registered On:	2022-09-10	
Expires On:	2023-09-10	
Updated On:	2022-09-10	
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited	
Name Servers:	kanye.ns.cloudflare.com kira.ns.cloudflare.com	

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Registr	ant Contact
State:	ca
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Technical Contact

Email: privacy@cosmotown.com

Administrative Contact



.CLUB @ \$6.88 \$20.48

Raw Whois Data

Email:

Domain Name: techaccents.net

Registry Domain ID: 2724346991_DOMAIN_NET-VRSN
Registrar WHOIS Server: whois.ccdomain.co.kr
Registrar URL: http://www.cosmotown.com
Updated Date: 2022-09-10703:40:47Z
Creation Date: 2022-09-10703:30:54Z

Registrar Registration Expiration Date: 2023-09-10T03:30:54Z

privacy@cosmotown.com

Registrar: COSMOTOWN, INC. Registrar IANA ID: 1509

Registrar Abuse Contact Email: abuse@cosmotown.com Registrar Abuse Contact Phone: +1.6504739500

Domain Status: clientRenewProhibited http://icann.org/epp#clientRenewProhibited
Domain Status: clientTransferProhibited http://icann.org/epp#clientTransferProhibit
Domain Status: clientDeleteProhibited http://icann.org/epp#clientDeleteProhibited
Domain Status: clientUpdateProhibited http://icann.org/epp#clientUpdateProhibited

Registrant Organization: Registrant State/Province: ca Registrant Country: US

Registrant Email: privacy@cosmotown.com Admin Email: privacy@cosmotown.com Tech Email: privacy@cosmotown.com Name Server: kanye.ns.cloudflare.com Name Server: kira.ns.cloudflare.com

DNSSEC: unsigned



2/20/23, 5:38 PM Whois techaccents.net

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/ >>> Last update of WHOIS database: 2022-09-10T03:40:47Z <<<

For more information on Whois status codes, please visit https://www.icann.org/reso

Notes: Port43 will provide the ICANN-required minimum data set per ICANN Temporary

The Data in the COSMOTOWN, INC. WHOIS database is provided by COSMOTOWN, INC. for i

related domain names

ccdomain.co.kr cosmotown.com icann.org cloudflare.com internic.net

Whois Identity for everyone	
-----------------------------	--

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Sitelock

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MarkScarn

Hotstar Enforcement <hotstar_enforcement@markscan.in>

[Notice ID:4021457] Copyright Infringement Notice under DMCA & Indian Copyright Act [Domain:techaccents.net]

1 message

hotstar_enforcement@markscan.in < hotstar_enforcement@markscan.in >

Mon, Feb 20, 2023 at 2:32

ΑM

To: info@techaccents.net

Dear Sir/Madam,

Sub: Take down of content illegally hosted/uploaded on your website

We 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, re-broadcast, 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.

Novi Digital is the exclusive owner of the copyright in the work **Properties of HotStar and Hotstar.** In addition to the above, Novi Digital Entertainment Pvt. Ltd. is the exclusive owner of several trademarks connected with **Properties of HotStar and Hotstar.**

We have come across the following content in relation to **Properties of HotStar and Hotstar** being illegally made available on your website:

https://www.techaccents.net/pikashow-247/https://www.techaccents.net/rts-tv-291/

Proof evincing that the content being infringed is owned by Novi Digital Entertainment Pvt. Ltd. is available at the following links:

http://www.hotstar.com/

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.

You are hereby put to strict notice that hosting of the said content identified herein above is a violation of the Rights Holder's exclusive proprietary rights and copyright.

In lieu of the above, we hereby demand that you within 48 hours from receipt of this notice cease such unlawful activity of illegally uploading content and desist from indulging in any further infringement of the Rights Holder's rights in the content, which is exclusively owned and protected by our clients. Without limitation and prejudice to the above, we hereby call upon you to within 48 hours from receipt of the notice cease & desist from using your website to directly and/or indirectly cause, contribute to, enable, facilitate, aid, abet, induce, encourage and/or participate in the infringement of the Rights Holder's copyright protected works, including but not limited to the content/intellectual property rights identified herein above.

We further inform you that a copy of this notification is being sent to your hosting service provider. You are mandated under the law to remove or disable access to the infringing materials upon receiving this notice. Should we not receive reply from you within 48 hours from receipt of this notice, Our Clients will have no alternative but to take such further action as deemed necessary to protect their interests and rights. For the avoidance of doubt, all rights of Our Clients including the right to claim costs and damages are hereby reserved.

We believe that the information in this notice is sufficient for you to locate and take down the infringing activities complained of herein. We are providing this notice 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 website and 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

DIGITAL SIGNATURE FOR COPYRIGHT CLAIM

Authorized online digital content production representative for Novi Digital

Ishita Singh

Markscan

E-14C, 1st Floor, Sector-8,

NOIDA, U.P. -201301, INDIA

Ph: 91-120-4297246/47/48

Web.: www.markscan.co.in

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

In case of any conflict, please write to us at info@markscan.co.in , internet.enforcement@markscan.in

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

IN THE MATTER OF

Star India Pvt. Ltd. & Anr.

...Plaintiffs

Versus

Ashar Nisar & Ors.

...Defendants

MEMO OF PARTIES

(1) Star India Pvt. Ltd.

Star House, Urmi Estate,

95, Ganpatrao Kadam Marg,

Lower Parel (W),

Mumbai- 400013

Also, at:

Vatika Business Centre, Thapar House,

Gate No. 1, Eastern & Central Wing

3rd Floor, 124 Janpath

New Delhi -110001

Email: diksha.snehal@startv.com

(2) Novi Digital Entertainment Pvt. Ltd.

Star House, Urmi Estate,

95, Ganpatrao Kadam Marg, Lower Parel (W),

Mumbai- 400013

Email: diksha.snehal@startv.com Plaintiffs

Versus

(1) Ashar Nisar

Owner of Ninja TV App and related domains ninjatv.pk, ninjatv.app, powerex.pk

Email: ashar@pknic.net.pk, abuse@namecheap.com

Phone No.: +408-437-8953

(2) Saiful Islam

Owner of RTS TVApp and related domains rtstv-app.com, rtstvapk.xyz, xtsaiful.xyz

Email: <u>saiful2814850@gmail.com</u>, <u>rtsaifultech1@gmail.com</u>, <u>rtsaiful0@gmail.com</u>, <u>rtsaiful5@gmail.com</u>, <u>abuse@publicdomainregistry.com</u>, <u>abuse@namecheap.com</u>

Phone No.: 880 1572601309, 880 1311281485, 880

1744997215

(3) Mr. Vinny

KyteTV App and related domains kytetv.site, kyte-tv.com, api-kytetv.lalalalalori.workers.dev

Email: <u>domains@hostinger.com</u>, <u>abuse@godaddy.com</u>, <u>abuse@101domain.com</u>, <u>mrvinny0007@protonmail.com</u>

- (4) Picaso TV and related domains picasotv.co, <u>jfskkfsjfsksdey.najfilmy.eu</u>, <u>adhkjgfyufsf.najfilmy.eu</u> Email: <u>abuse@godaddy.com</u>, <u>domain-admin@eurid.eu</u>
- (5) Stream India App and related domains streamindia.app, streamindia.live, streamindianew.xyz, globalnewsgeeks.xyz Email: abuse@namecheap.com
- (6) Hotstar Mod App
- (7) apkdevil.com 86364e3dd1024095aef138c5e4844fc0.protect@withheldforp rivacy.com; contact@appstoreaccess.com; support@apkdevil.com
- (8) Shaniyal Malik apkfileok.com

proxy@whoisprotectservice.com; shaniyalmalik11@gmail.com

(9) apkmole.com abuse@godaddy.com

(10) apkpot.com 669185948b21493fb294cda0810b1c38.protect@withheldfor privacy.com; contact@apkpot.com

(11) Sajid Hussain downloadapks.net sajidhussain1055@gmail.com

(12) techbigs.com pw-696ada3029f9ded6e32680fe7bb0306c@privacyguardian.org; support@techbigs.com

(13) GoDaddy.com, LLC 14455 North Hayden Road, Suite 219 Scottsdale, AZ 85260 United States Email: HQ@GoDaddy.com

Also, At:
GoDaddy India Web Services Private Limited
003, Tower 4A, DLF Corporate Park,
MG Road Gurgaon – 122002
Email: legal@godaddy.com

(14) PDR LTD. D/B/A

publicdomainregistry.com
Directi Web Technology Pvt Limited Unit No. 501,
5th Floor & Unit IT Building No. 3,
Nesco IT Park, Nesco Complex,
Western Express Highway, Goregaon (East),
Mumbai Maharashtra 400063, India
Email: complaint@publicdomainregistry.com

(15) NameCheap Inc.

Module 403, Tidel Park Coimbatore Ltd Elcosez Aerodrom Coimbatore, TN - 641014 Email: support@namecheap.com

(16) NameSilo, LLC. 8825 N, 23rd Ave Suite 100 Phoenix, AZ USA - 85021 Email: support@namesilo.com

(17) GMO Internet, Inc.
26-1, Sakuragaokacho Cerulean Tower
Shibuya-Ku
Tokyo - 150 8512
Email: abuse@gmoregistry.com

(18) Dynadot, LLC
210 S Ellsworth Ave
#345 San Mateo, CA
94401 US
Email: info@dynadot.com

(19) OpenTLD B.V.
Danzigerkade 23 D 1013 AP, Amsterdam,
NOORD-HOLLAND Netherlands
Email: jzuurbier@opentld.com
+31205315726

(20) PKNIC 435 Tariq Block, Garden Town, Lahore, PK Email: staff@pknic.net.pk +92-(332)-477-1656 +92-(332)-477-2669

(21) 101domain GRS Limited
Level 2, Plaza 3,
Custom House Plaza,
Harbourmaster Place,
Dublin D01 VY76, Ireland
Email: legal@101domain.com; abuse@101domain.com

+1.760.444.8674

(22) Hostinger, UAB

Jonavos g. 60C

Kaunas, Lithuania - 44192

+37064503378

E-mail ID: domains@hostinger.com; abuse@hostinger.com

(23) Atria Convergence Technologies Pvt. Ltd.

99A/113A, ManorayanaPalya

R.T. Nagar Bangalore – 560032

Also, At:

2nd and 3rd Floor, No. 1,

Indian Express Building, Queen's Road,

Bangalore 560001 Karnataka

E-mail: nodal.term@actcorp.in;

Jitesh.chathambil@actcorp.in

(24) Bharat Sanchar Nigam Ltd.

Bharat Sanchar Bhawan, Regulation Cell

5th floor, Harish Chandra Mathur Lane

Janpath, New Delhi -110001

E-mail: ddg reg@bsnl.co.in; sbkhare@bsnl.co.in;

averma@bsnl.co.in

(25) Bharti Airtel Ltd.

Airtel Centre, Tower-A, 6th floor

'A' Wing, Plot No.16, Udyog Vihar

Ph - IV, Gurgaon – 122016

E-mail: amit.bhatia@airtel.com

(26) Hathway Cable & Datacom Pvt. Ltd.

'Rahejas',4 floor, Main Avenue

Santacruz (W), Mumbai-400054

E-mail: ajay.singh@hathway.net; dulal@hathway.net;

sudhir.shetye@hathway.net

(27) Mahanagar Telephone Nigam Ltd.

5th Floor, Mahanagar Doorsanchar Sadan 9

CGO Complex, Lodhi Road

New Delhi – 110003

E-mail: raco.mtnl@gmail.com; mtnlcsco@gmail.com gmracomtnl@gmail.com

(28) Reliance Jio Infocomm Limited RCP 14 (TC 23), Phase 4, B-Block, 3rd Floor, C 4 130 Twane-Belapur Road, Gansoli, Navi Mumbai- 400701 E-mail: care@jio.com; sunil.kr.gupta@ril.com; jyoti.jain@ril.com; neelakantan.an@ril.com

(29) Shyam Spectra Pvt. Ltd.
Plot No. 258, Okhla Industrial Estate,
Phase III, New Delhi – 110020

Also, at:
Plot No. 21-22, 3rd Floor
Udyog Vihar, Phase IV, Gurugram -122015
E-mail: info@spectra.co; compliance@spectra.co

(30) Tata Teleservices Ltd. A, E & F Blocks Voltas Premises - T. B. Kadam Marg Chinchpokli, Mumbai – 400033

> Also, at: Jeevan Bharati Tower I, 10th Floor, 124, Connaught Circus, New Delhi 110 001

E-mail: pravin.jogani@tatatel.co.in; anand.dalal@tatatel.co.in; satya.yadav@tatatel.co.in

(31) Vodafone Idea Limited
 Vodafone House,
 Peninsula Corporate Park,
 Ganpatrao Kadam Marg, Lower Parel
 Mumbai - 400 013 India

Also, At: Birla Centurion, 10th Floor, Plot no.794 B Wing, Pandurang Budhkar Marg Worli, Mumbai - 400 030 India E-mail: florencia.depores@vodafoneidea.com; smitha.Menon@vodafoneidea.com; pankaj.kapdeo@vodafoneidea.com; Radhika.gokhale@vodafoneidea.com

- (32) Department of Telecommunications
 Through Secretary,
 Ministry of Communications and IT,
 20, Sanchar Bhawan, Ashoka Road,
 New Delhi 110001
 E-mail: secy-dot@nic.in, dirds2-dot@nic.in
- (33) Ministry of Electronics and Information Technology
 Through the Director General (DIT) Cyber Laws & esecurity),
 Electronics Niketan, 6, CGO Complex,
 Lodi Road, New Delhi 110003
 E-mail: cyberlaw@meity.gov.in,
 gccyberlaws@meity.gov.in,
 pkumar@meity.gov.in, sathya.s@meity.gov.in
- (34) Ashok Kumar(s) ...Defendants

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

Place: New Delhi

Date: 31st March 2022

Advocates for the Plaintiffs

57 Jor Bagh,

New Delhi - 110003

+91 9999064036

yatinder@saikrishnaassociates.com

NOTE: Defendant No. 1 along with Defendant Nos. 2 - 12 are the main contesting parties.